

Public Document Pack

Blackpool Council

15 April 2022

To: Councillors Benson, Brookes, Campbell, Farrell, Hobson, Hugo, Smith, Taylor and L Williams

The above members are requested to attend the:

EXECUTIVE

Monday, 25 April 2022 at 6.00 pm
in the Council Chamber, Town Hall, Blackpool

A G E N D A

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 either a

- (a) personal interest
- (b) prejudicial interest
- (c) disclosable pecuniary interest (DPI)

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 COMMUNITY SAFETY PLAN 2022-2025** (Pages 1 - 30)

To consider for recommendation to Council- the Blackpool Community Safety Plan 2022-2025 once approved this document will form part of the Council's Policy Framework.

3 **LOCAL TRANSPORT PLAN PROGRAMME 2022/2023 - 2024/2025** (Pages 31 - 38)

To consider the 2022/2023 - 2024/2025 Local Transport Plan Programme, which

includes Integrated Transport Block and Highways Maintenance Block elements and the complementary Potholes Fund highways maintenance allocation, all grant allocations from the Department for Transport as notified late-February 2022.

4 ADOPTION OF GREENING BLACKPOOL SUPPLEMENTARY PLANNING DOCUMENT (SPD)
(Pages 39 - 164)

This report presents the Greening Blackpool Supplementary Planning Document for adoption and the Greening Blackpool SPD – Consultation Statement for publication.

5 LEVELLING UP FUND ROUND 2 (Pages 165 - 188)

To consider a summary of the main provisions of the Levelling Up Fund (LUF) Round 2 further to the launch of the full bidding guidance on the 23 March 2022 and to inform the Executive of the proposed approach to bidding.

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

Copies of agendas and minutes of Council and committee meetings are available on the Council's website at www.blackpool.gov.uk.

Report to:	EXECUTIVE
Relevant Officer:	John Blackledge, Director of Community and Environmental Services
Relevant Cabinet Member:	Councillor Neal Brookes, Cabinet Member for Enforcement, Public Safety, Highways and Transport
Date of Meeting:	25 April 2022

BLACKPOOL COMMUNITY SAFETY PLAN 2022-2025

1.0 Purpose of the report:

1.1 To consider for agreement and recommendation to Council for adoption the Blackpool Community Safety Plan 2022-2025, which has been developed and produced by Blackpool's Community Safety Partnership.

2.0 Recommendation(s):

2.1 To recommend to the Council to agree and adopt the Blackpool Community Safety Plan 2022-2025, which would be managed and monitored by Blackpool's Community Safety Partnership with effect until 31 December 2025.

3.0 Reasons for recommendation(s):

3.1 Under Section 6 of the Community Safety Act 1998 the responsible authorities, commonly referred to collectively as a Community Safety Partnership (CSP) in a local government area, are required to work together in formulating and implementing a community safety plan to tackle local crime and disorder.

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

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

4.0 Other alternative options to be considered:

4.1 None, as the production of a Community Safety Plan is a requirement of the Community Safety Act.

5.0 Council priority:

5.1 The relevant Council priority is: “Communities: Creating stronger communities and increasing resilience”

6.0 Background information

- 6.1 Under Section 6 of the Community Safety Act 1998 the responsible authorities, commonly referred to collectively as a Community Safety Partnership (CSP) in a local government area, are required to work together in formulating and implementing a community safety plan to tackle local crime and disorder in the area.
- 6.2 Blackpool has a very robust and proactive Community Safety Partnership, which includes Blackpool Council (chair of partnership), Lancashire Constabulary, Blackpool Clinical Commissioning Group, Blackpool Teaching Hospital, Public Health, Lancashire Fire and Rescue Service, National Probation Service, Office of the Police and Crime Commissioner, North West Ambulance Service and Blackpool Coastal Housing. Also to note, as and when required other organisations may be opted in from the public, private, third, voluntary and community sectors.
- 6.3 The proposed community safety plan at Appendix 2a highlights current structure of groups (see page 3), which sit under the Community Safety Partnership and are used to deliver the priorities of the partnership. In addition, task and finish groups are created as and when required or emerging threats arise.
- 6.4 Blackpool Community Safety Partnership has key links and workings with the Lancashire Community Safety Partnership Strategic Board, Office of the Police and Crime Commissioner (PCC) and Lancashire Violence Reduction Network.
- 6.5 Key strategic objectives of the Community Safety Partnership relate to the successful delivery of the functions, improving community safety by tackling actual and perceived crime and anti-social behaviour and assist in supporting community confidence.
- 6.6 The Community Safety Partnership takes a public health approach to preventing and tracking serious violent crime. Through this approach, the partnership considers primary, secondary and tertiary prevention opportunities based on the model of prevention highlighted in the attached community safety plan.
- 6.7 In relation to the development of the attached Community Safety Plan, a due process has been followed which started with a Lancashire strategic assessment of data, followed by a Blackpool strategic assessment, which highlighted local areas of priority. In conjunction with this process, consideration was given to the Police and Crime Commissioner for Lancashire’s priorities in ultimately highlighting Blackpool’s key priority areas for the plan.

- 6.8 In terms of public consultation, questions relating to the community safety plan emerging priorities were asked using three approaches – an online shared survey link, face-to-face interviews during a public engagement activity in Blackpool town centre and paper questions that were distributed in Blackpool Council’s public facing buildings. The survey link was distributed via leaflets during the engagement week and shared on the Council’s social media pages, including Facebook and Twitter, throughout December and early January.
- 6.9 A total of 94 responses were received to the consultation, with 74 online responses, 14 face-to-face and six from the paper questionnaires. The results of the survey showed that 97.8% ranked violent crime and anti-social behaviour as very important or quite important priorities and sexual assault and rape as very important or quite important priorities. Full details are available in the plan attached at Appendix 2a.
- 6.10 Subsequently, the priorities were shared with a scrutiny review panel of the Tourism, Economy and Communities Scrutiny Committee on 31 January 2022. This was followed by a meeting of the Community Safety Partnership on 3 February 2022, where feedback from scrutiny was shared and the emerging plan developed further.
- 6.11 A revised plan was taken to the Community Safety Partnership on 28 March 2022, where the attached community safety plan and priorities were endorsed by the group.

6.12 The Blackpool Community Safety Plan priorities 2022-2025 are:

Drugs, alcohol and mental health	Serious organised crime	Vulnerabilities	Road Safety
<ul style="list-style-type: none"> • Begging • Residential burglary • Anti-social behaviour • Reduce re-offending 	<ul style="list-style-type: none"> • Modern day slavery • Human trafficking • Illicit trade • Drugs with harm 	<ul style="list-style-type: none"> • Violent crime • Child criminal and sexual exploitation • Sexual offences and rape • Domestic abuse • Hate crime • Anti-social behaviour 	<ul style="list-style-type: none"> • This area of work will be led by Highways and Traffic Management division, working in conjunction with the Lancashire Road Safety Partnership

- 6.13 The active multi-agency groups that sit under the Community Safety Partnership and identified at page three of the proposed plan will further develop action plans over the life of the plan to address the priorities. In addition, there are plans to establish working groups to address highlighted priorities not already covered, such as violence, burglary and robbery. It is important to note that where required, the analytical product victim offender location model is used to problem solve particular priorities.
- 6.14 An operational overachieving action plan covering the main issues from the various groups will be established in 2022/2023, which will be monitored by the Community Safety Partnership.

6.15 In addition, the proposed community safety plan highlights the focus in relation to counter terrorism and also the Community Safety Partnership role in relation to Domestic Homicide Reviews.

6.16 Does the information submitted include any exempt information? No

7.0 List of Appendices:

7.1 Appendix 2a: Community Safety Plan.

8.0 Financial considerations:

8.1 The delivery of the plan is through a multi-agency approach, where resources are coordinated and pooled. Various funding streams are available in relation to initiatives and programmes, which will be applied for during the course of the plan.

9.0 Legal considerations:

9.1 This group includes the statutory responsible authorities, as outlined within the 1998 Crime and Disorder Act, as amended by the 1999 Youth Justice and Criminal Evidence Act, the 2000 Powers of Criminal Courts (Sentencing Act), the 2001 Anti-Terrorism, Crime and Security Act, the 2002 Police Reform Act, the 2006 Police Justice Act, the 2009 Policing and Crime Act and the 2014 Anti-Social Behaviour Crime and Policing Act, the Serious Crime Act 2015, and the Domestic Action 2021, and the forthcoming Responsibilities and Duties around Serious Violence which is due in Autumn 2022.

10.0 Risk management considerations:

10.1 The plan will address key risk and threats relating to crime and disorder in Blackpool.

11.0 Equalities considerations:

11.1 In the course of developing this, the Council and partners have considered whether there could be unintended adverse impacts on people because of shared characteristics protected by the Equality Act. The Council is aware of the particular vulnerabilities relating to equality and crime/community safety, these concerns are reflected in the local priorities in particular, hate crime, violence and harassment, and misogyny against women and girls.

11.2 The Council and partners have also reflected on our responsibilities to give due regard to the aims of the public sector equality duty in respect of tackling discrimination, advancing opportunity and promoting cohesion. Given that we know there is evidence to indicate poor levels of cohesion are present in parts of inner Blackpool, we will build consideration of these issues into our equality analysis alongside our priority action plans.

12.0 Sustainability, climate change and environmental considerations:

12.1 Elements of the community safety plan relate to protecting the environment, particularly in relation to anti-social behaviour.

13.0 Internal/external consultation undertaken:

13.1 Extensive engagement within the Council and other responsible authorities (see 6.1), Scrutiny Committee and the wider community.

14.0 Background papers:

14.1 None.

15.0 Key decision information:

15.1 Is this a key decision? Yes

15.2 If so, Forward Plan reference number: 24/2021

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

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

16.0 Call-in information:

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

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

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

17.0 Scrutiny Committee Chairman (where appropriate):

Date informed: 13 April 2022 Date approved:

18.0 Declarations of interest (if applicable):

18.1

19.0 Summary of Discussion:

19.1

20.0 Executive decision:

20.1

21.0 Date of Decision:

21.1

22.0 Reason(s) for decision:

22.1

23.0 Date Decision published:

23.1

24.0 Alternative Options Considered and Rejected:

24.1

25.0 Executive Members in attendance:

25.1

26.0 Call-in:

26.1

27.0 Notes:

27.1

BLACKPOOL COMMUNITY

Safety Plan

2022 - 2025



Working together to make a difference

Contents

Foreword	01	Crime Overview	12
Introduction Structure of the Community Safety Partnership	02	Anti-Social Behaviour (ASB) Overview	13
Bsafe Blackpool Strategic Partnership Group	03	Strategic Assessment of data	14
Working with Lancashire Partners	04	Public and Stakeholder Consultation	16
Strategic Objectives	05	Priorities for 2022-2025	17
Landscape over the last three years	06	Future Focus Counter Terrorism	18
Our Public Health Approach	07	Domestic Homicide Reviews (DHR)	19
Economic and Social Context	08	Partner Support	20

Foreword

Welcome to the 2022- 2025 BSafe Blackpool Community Safety Plan, which sets out the Community Safety Partnership priorities for the next three years. Strong partnership working has been for many years, and will remain, one of the main strengths of the partnership in addressing crime, antisocial behaviour, drug and alcohol misuse. Despite a lot of good work in the last three years and Blackpool remaining a safe place to live and visit, certain crime categories are still higher than the Lancashire and national average, and therefore the partnership will be supporting the development of interventions aimed at reducing these crime categories. The partnership is aware that some of the areas experiencing high levels of crime are some of the most deprived areas in the country, and therefore the partnership is aware that working with those addressing poor education, unemployment, poor housing and poor health is paramount in reducing crime and antisocial behaviour, as well as drug and alcohol misuse.

I would like to take this opportunity to thank all our partners for their hard work in supporting the last Community Safety Plan, and I look forward to working with you all in implementing this one over the next three years.



Councillor Neal Brookes

*Cabinet Member for Enforcement,
Public Safety, Highways and Transport*

Introduction

Structure of Community Safety Partnership

The purpose of the Blackpool Community Safety Partnership is to reduce crime and antisocial behaviour, drug and alcohol misuse and re-offending in Blackpool, as well as supporting the victims of crime and the communities affected by crime, antisocial behaviour and substance misuse.

The membership of the Blackpool Community Safety Partnership includes Blackpool Council, Lancashire Constabulary, Blackpool Clinical Commissioning Group, Blackpool Teaching Hospital, Blackpool Coastal Housing, Lancashire Fire and Rescue Service, National Probation Service, Office of the Police and Crime Commissioner and the North West Ambulance Service. However, as and when required other organisations may be opted in from the public, private, third, voluntary and community sector.

Over and above these organisations, a number of additional agencies from the public, private, voluntary and community sectors also support BSafe Blackpool. Working together in this way allows the partnership to gain a better insight into the issues within Blackpool, as well as providing wider options

for applying multi-agency responses to these problems. This therefore ensures more holistic and effective solutions to be undertaken.

This group includes the statutory responsible authorities, as outlined within the 1998 Crime and Disorder Act, as amended by the 1999 Youth Justice & Criminal Evidence Act, the 2000 Powers of Criminal Courts (Sentencing Act), the 2001 Anti-Terrorism, Crime & Security Act, the 2002 Police Reform Act, the 2006 Police Justice Act, the 2009 Policing and Crime Act and the 2014 Anti-Social Behaviour Crime & Policing Act, the Serious Crime Act 2015, and the Domestic Abuse Act 2021, and the forthcoming Responsibilities and Duties around Serious Violence which is due in Autumn 2022.

Internally, the work of the partnership is accountable to the local authority scrutiny process on an annual basis. Externally, the partnership is accountable to the Home Office, which ensures that its work addresses both the national and local priorities.

Working with Lancashire Partners

Members of the Blackpool Community Safety and Drugs Partnership (BSafe Blackpool) attend the Lancashire Community Safety Strategic Board, and have regular meetings with the Office of the Police Crime Commissioner (OPCC) and Lancashire Violence Reduction Network.

Lancashire Community Safety Partnership Board (LCSPB):

The Lancashire Community Safety Partnership Board (LCSPB) is responsible for addressing community safety issues through co-ordinating the work of county-wide 'responsible authorities' and other agencies to tackle priorities and deliver stronger and safer communities. The current board structure includes the Lancashire 12 districts and the unitary authorities of Blackburn with Darwen and Blackpool by invite and together all are referred to as the 'Lancashire 14'.

The Office of the Police Crime Commissioner (OPCC):

The OPCC supports the Police and Crime Commissioner (PCC) in his work. The OPCC meets regularly with various partners to work collaboratively in problem solving crime and antisocial behaviour as well as seek funding from the government or PCC funding streams.

Lancashire Violence Reduction Network (VRN):

The Lancashire VRN is made up of partners from across public services and the third sector who are working to shift the mind set towards early intervention and prevention to facilitate a culture change and embed new approaches to supporting Lancashire communities.

Strategic Objectives

A number of strategic objectives have been established for the Community Safety Partnership. These strategic objectives help ensure that the Community Safety Partnership is focusing on the issues that matter most within the local community.

Strategic Objective 1

To successfully deliver the functions of the Community Safety Partnership for Blackpool by:

- Engaging with local community and statutory groups to identify local concerns in relation to community safety and to invite their contribution to prioritising and addressing those concerns;
- Preparing the Community Safety Partnership plan and organising the work of the partnership to meet priority needs;
- Putting in place implementation structures and delivery mechanisms and facilitating resident focused participatory community safety

structures that will contribute to a reduction in crime and the enhancement of policing and community safety in the partnership's area, directly through the collaborative working of the membership of the partnership, through the work of its delivery groups or through working in partnership with, or supporting the work of others;

- Increasing Community Safety Partnership awareness with the public and key stakeholders by planning communications activity to more proactively inform and promote the work of the Community Safety Partnership.

Strategic Objective 2

To improve community safety by tackling actual and perceived crime and anti-social behaviour through:

- Working in partnership with designated partners, local statutory bodies/agencies, the voluntary sector and the community to deal with, and reduce the impact of, actual and perceived anti-social behaviour and crime in the community;
- Ensuring that local statutory bodies and agencies deal with the anti-social behaviour

and crime-related issues that matter in their area;

- Providing comprehensive community input into decision making processes about tackling actual and perceived anti-social behaviour and giving feedback on the effectiveness of interventions on meeting outcomes;
- Working in partnership with the police, local statutory bodies, agencies and the community to reduce the impact of anti-social behaviour and crime on the community.

Strategic Objective 3

To support community confidence through:

- Ensuring local accountability through the Community Safety Partnership's role in monitoring performance of the groups delivering the action plans;

- Ensuring that Community Safety Partnership delivery reflects the involvement, views and priorities of local communities.



What has happened since the last Community Safety Plan

In response to the coronavirus (COVID-19) pandemic, lockdown restrictions came into effect from 23 March 2020 and imposed strict limits on daily life. These included significant restrictions on freedom of movement and a requirement by law for a range of businesses to close. Once in lockdown calls for police service reduced tenfold. An analysis of the impact of the coronavirus (COVID-19) lockdown showed a decrease in almost all areas of crime recorded by police. This was driven by reductions in theft offences, particularly domestic burglary and theft of personal property. As this period coincided with the majority of people spending long periods at home during lockdown, it is not unexpected.

The May 2020 – 2021 Crime Survey for England and Wales shows that while there were decreases across a range of individual crime types, particularly theft offences, these were offset by rises in fraud and computer misuse offences, resulting in no change in overall levels of crime.

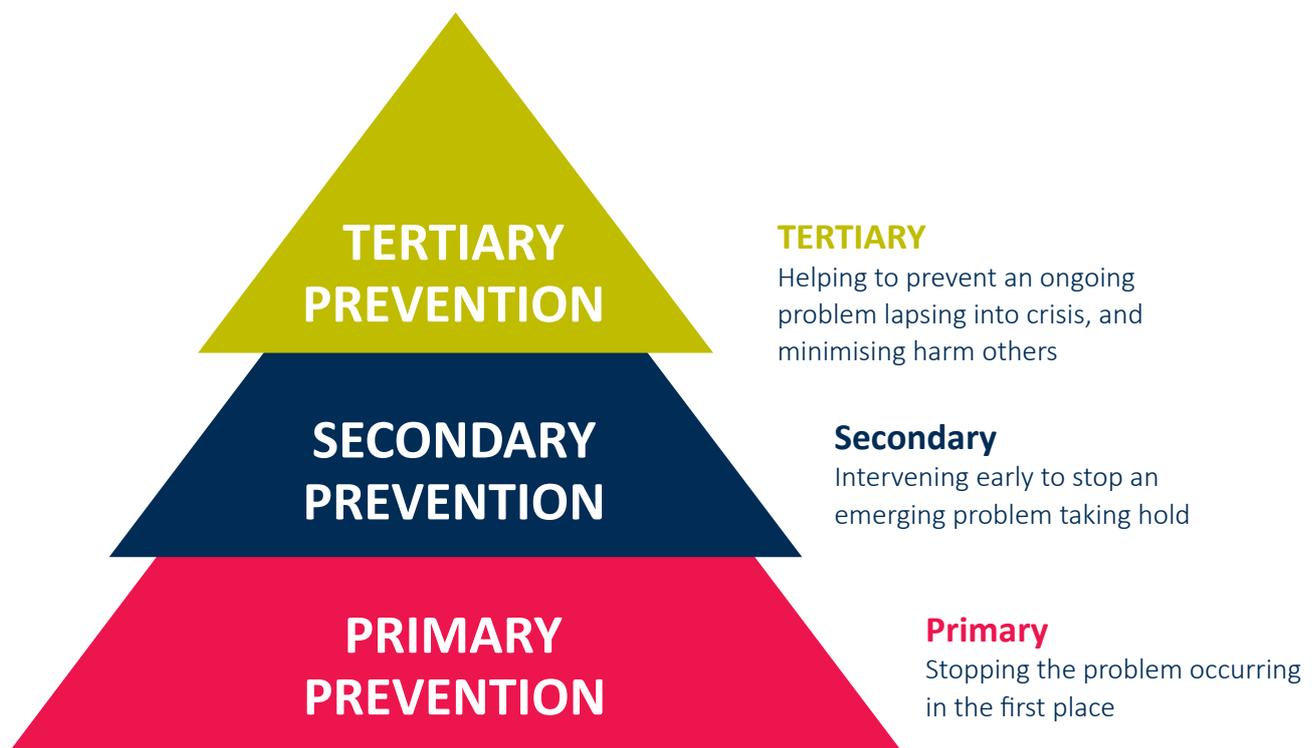
In terms of Anti-Social Behaviour (ASB) and Crime, it is difficult to interpret performance over the last three years as a result of the COVID-19 pandemic.

Our Public Health Approach

The Community Safety Partnership is taking a 'public health approach' to preventing and tackling serious violent crime. A 'public health approach' treats violence like an infectious disease and involves using scientific evidence to identify what causes violence and find interventions that work to prevent it spreading.

Preventing rather than reacting to serious violence has both human and economic benefits for individuals, families, communities, services and society as a whole. Therefore, we will be implementing early interventions to prevent people from becoming involved in violent crime.

Through this approach, we will consider primary, secondary and tertiary prevention opportunities based on the model of prevention (see below chart).



The model of prevention, 2020-2025 Lancashire Serious Violence Strategy, Lancashire Violence Reduction Network.

Blackpool

Economic and social context

To stop crime occurring in the first place (primary prevention) requires an improvement in the economic and social context of Blackpool, such as improved housing and education. The following highlight the economic and social issues that need to be addressed in the wider context to support the work of the Community Safety Partnership in reducing crime and keeping people safe. These issues are not directly within the remit of the Community Safety Partnership but partner organisations have a key role to play in making improvements.

In March 2022, Michael Gove announced new plans to level up Blackpool and in a further boost, Blackpool was also selected as one of 20 areas in England primed to receive a King's Cross-style transformation through an ambitious regeneration programme. The opportunities to address Blackpool's social and economic issues through the Government's Levelling Up agenda is particularly important as plans to crack down on rogue private landlords and invest in regeneration projects will help improve the lives of people in Blackpool by creating new opportunities for regeneration, jobs for the community and new homes for residents.

Gender

The population of Blackpool is approximately 138,381, **50.3%** of the population are estimated to be female and **49.7%** are male ⁽¹⁾.

Age

A larger proportion of residents are aged 65+ (**20.5%**) compared to the national age structure (**18.5%**). The working age population (16-64) in Blackpool is smaller than the national figure, additionally the 0-15 population in Blackpool is also slightly smaller than the national age structure.

Ethnicity

Residents are mostly of White British ethnicity (**93.6%**), which is significantly higher than across England and Wales (**80.5%**). Black and minority ethnic groups, including Irish and European residents, are estimated to make up **6.4%** of the population (approximately 9,000 people), compared with the estimated population for England and Wales of **19.5%** ⁽²⁾.

Sources:

⁽¹⁾ ONS mid-year population estimate June 2020, ONS (2021)

⁽²⁾ Ethnic Group, Census 2011

Long-term illness and Disability

25.6% of people in Blackpool reported a long-term health problem or disability at the last Census, which is eight percentage points higher than the national average.

Sexual Orientation

ONS estimates from Annual Population survey data that amongst adults in Blackpool, around 107,100 (**94.9%**) adults identify as heterosexual, 3,700 (**3.2%**) people identify as gay or lesbian, around 600 (**0.6%**) people identify as bisexual and 500 (**0.4%**) adults whose sexual orientation is classified as 'other'.

Around 1,000 adults in Blackpool sexual orientation is unknown due to answering 'don't know' or refusing to answer the survey question ⁽³⁾. Other estimates have put Blackpool's LGBTQ+ population as higher than the combined estimates from the data above.

Deprivation

Blackpool has a large proportion of residents living in deprived areas. According to the English Index of Multiple Deprivation (IMD) from 2019, Blackpool continues to rank as the most deprived of 317 Local Authority areas in England based on both average LSOA score and concentration of deprivation measures. The town has the highest proportion of its neighbourhoods in the most deprived 1% nationally.

Deprivation is measured using The Indices of Deprivation 2019 (IMD 2019). It is based on seven different domains of deprivation:

- Income Deprivation
- Employment Deprivation
- Education, Skills and Training Deprivation
- Health Deprivation and Disability
- Crime
- Barriers to Housing and Services
- Living Environment Deprivation.

Combining information from the seven domains produces an overall relative measure of deprivation

Qualifications

In terms of qualifications, Blackpool has a lower proportion of its working age resident population with NVG4 and above qualifications (**23.9%**) as compared to national (GB) average (**43.1%**).

Source:

⁽⁴⁾ *Employment and unemployment (Jul 2020-Jun 2021): Economically Active, ONS annual population survey (2021).*

⁽⁵⁾ *People on Universal Credit, October 2021, Department for Work and Pensions (2021).*

⁽⁶⁾ *Gross Weekly Pay, Earnings by place of work, ONS annual survey of hours and earnings - workplace analysis (2021)*

⁽⁵⁾ *People on Universal Credit, October 2021, Department for Work and Pensions (2021).*

⁽⁶⁾ *Gross Weekly Pay, Earnings by place of work, ONS annual survey of hours and earnings - workplace analysis (2021).*

Benefit Claimants

There are a high proportion of benefit claimants with out-of-work benefits at a rate of approximately 16.6%, the majority of which claim ESA and incapacity benefits.

74.8% of working age people in Blackpool are estimated to be economically active, compared to national (GB) average rate of **78.4%** ⁽⁴⁾. There are a high proportion of benefit claimants with out-of-work benefits at a rate of approximately 16.6%, the majority of which claim ESA and incapacity benefits.

As of May 2021, 1,102 working age residents claim disability living allowance (**1.3%**). The proportion is more than double for the North West and England.

As of October 2021, around **15.6%** of Blackpool's working age population are estimated to be on Universal Credit and not in employment, which is more than seven percentage points higher than the national figure (England) at **8.3%** ⁽⁵⁾.

Gross weekly pay

As of 2021, the gross weekly pay for full time employees in Blackpool per week is approximately £541.50 compared to the national median wage at **£612.80** ⁽⁶⁾.

Housing

One of the main drivers of deprivation in Blackpool is poor housing; the oversupply of poor quality rented accommodation has far-reaching consequences on health, crime and antisocial behaviour, worklessness, community resilience and stability.

15.3% (10,810) of all homes in Blackpool are privately rented. Anecdotal data suggests the private rental sector has seen growth, particularly within inner wards. There is a relatively small social rented sector (**5.7%**), and **29.5%** of homes are in the owner occupied sector.

Changes in seaside economies have led to patterns that have created a market based on former guest houses being converted into houses of multiple occupancy (HMOs). This type of accommodation facilitate a predominantly transient population. Poor quality housing concentrated in the inner wards, alongside unstable tenancies, contributes to high levels of crime and antisocial behaviour. The introduction of selective licensing schemes in 2012 in some areas of the town aim to improve management standards in private rented accommodation and reduce antisocial behaviour.

Additionally, recent homelessness figures show that the issue in Blackpool is three times that of the national average per head of population (Blackpool Council Homelessness Review and Homelessness Prevention Strategy 2018-2023).

Health and lifestyles

Blackpool has the lowest life expectancy across England.

Life expectancy for males in the town is the poorest in England at **74.1 years** compared to the national average of **79.4 years**. Life expectancy for females is similarly poor at **79.5 years** compared to **83.1 years** for England. The biggest contributory factors for both men and women locally are cardiovascular disease and cancer, as is the case nationally. Additionally, high rates of alcohol-related conditions, drug misuse and suicide are also important factors in attempting to explain low life expectancy in Blackpool⁽⁷⁾.

There are high levels of alcohol related harm in the North West, with substance misuse prevalence being the worst in the UK. In Blackpool patterns of alcohol consumption varies depending on the area. The inner wards experience both high levels of deprivation and the highest prevalence of off licence premises, which is associated with higher levels of drinking. Alcohol mortality rates for males in Blackpool are the worst in the country and the alcohol related hospital admission rate in Blackpool is more than double than the national average⁽⁸⁾.

Additionally, mental health is an increasingly important issue both nationally and locally. The 'Common Mental Health Disorder Profile' developed by Public Health England indicated that the prevalence of depression is significantly higher in Blackpool than the national average. In Blackpool in 2020/21, **19.8%** of the 18+ population were estimated to have depression compared to **12.3%** nationally⁽⁹⁾.

Source:

⁽⁷⁾ National life tables – life expectancy in the UK: 2018 to 2020, ONS (2021)

⁽⁸⁾ Calculated by Public Health England: Population Health Analysis (PHA) team using data using data from NHS Digital - Hospital Episode Statistics (HES). Fingertips PHE(2021).

⁽⁹⁾ Quality and Outcomes Framework (QOF), NHS Digital. Fingertips PHE(2021).

Outcomes for young people

The challenging social and economic context impacts significantly on children's life chances.

8,935 (34.1%) of children aged under 16 in Blackpool are living in households below 60% median income after housing costs. Which is higher than the national figure of 30.4% and North West figure of 30.8%.

The health of children is poorer across a range of indicators. Blackpool has the highest prevalence of smoking during early pregnancy in the country at 29.1%. The prevalence of obesity (including severe obesity) among children in year 6 is at 25.1%, higher than the national average of 20.4%. There are also significant safeguarding needs with rates of looked after children the highest in England at a rate of 210 per 10,000 children (DFE, 2021).

In 2019/2020, 66.9% of children in Blackpool reached the expected levels in Key Stage 2 compared with 65.3% of all children nationally and 64.6% of children in the North West. Blackpool pupils perform below national levels at GCSE level, with the latest results in 2020/21 showing a lower proportion of pupils achieving a grade 4 or above in English and Maths GCSEs (57.5% compared to 72.2% nationally).



Night time economy

The night time economy (NTE) in Blackpool is particularly vibrant with a very high number of licensed premises in the town centre.

Blackpool has the highest number of licensed premises in Lancashire with 2018 figures showing 1550 licensed premises. Almost half of all employment in Blackpool is driven by the NTE with a rate of 48.7% in comparison to the NTE employment rate for England at 33.3% (this includes all activity that feasibly operates at night). Although this industry has economic benefits for the town, the health and negative social impacts can be damaging. Tourists contribute a significant amount to the NTE especially during the summer which effects crime statistics, with them featuring as both victims and offenders. The latest figures prior to the Covid-19 pandemic estimate that 18.1 million visitors came to Blackpool, with over half of these recorded as staying visitors.



**Although the statistics referred to above are official statistics, it is important to note there have been changes in the Police recording systems and reductions in the time Police are able to investigate crimes. This came into force on 3rd April 2017 under Police & Crime Bill 2016. As a result of this change, crime figures have risen in all nationwide Police forces*

Crime overview

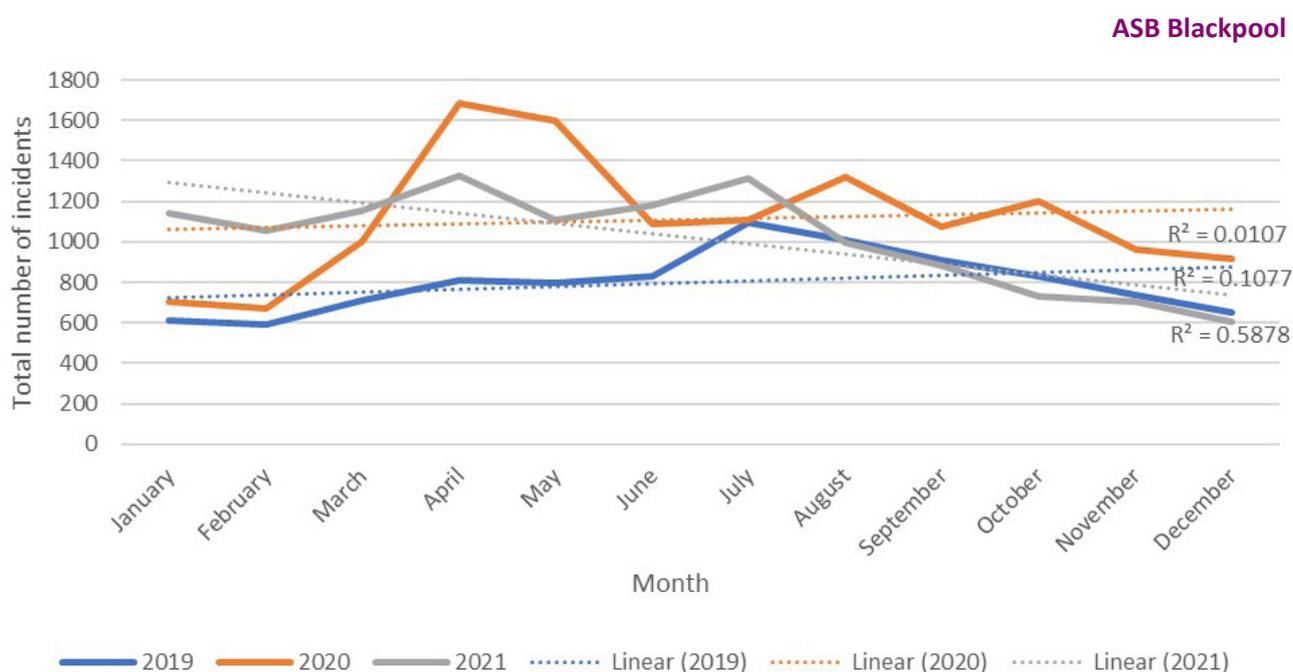
- **All crime:** There were 23,077 crimes recorded in Blackpool during January 2021-December 2021. This was an increase of 13% (+2,590) compared with the previous 12 months. Lancashire recorded a 9% (+11,009) increase in all crime.

COVID-19 restrictions/lockdowns during 2020 and part of 2021 caused crime to reduce to fewer opportunities. However, crime levels appeared to return back to pre-pandemic levels as of June 2021.

- **Alcohol-related crime:** There were 3,239 Alcohol related crimes recorded in Blackpool during January 2021-December 2021. This was an increase of 28% (+711) compared with the previous 12 months. Lancashire recorded a 20% (+2,465) increase in Alcohol related crime.
- **Residential burglary:** There were 714 Residential burglaries recorded in Blackpool during January 2021-December 2021. This was a decrease of -15% (-130) compared with the previous 12 months. Lancashire recorded a -12% (-688) decrease in Residential burglaries.
- **Drug offences:** There were 547 Drug offences recorded in Blackpool during January 2021-December 2021. This was a decrease of -10% (-63) compared with the previous 12 months. In addition to this, possession of drugs has decreased by -8% (-25). Lancashire recorded a -4% (-125) decrease in Drug offences.
- **Child Sexual Exploitation (CSE):** CSE is not a specifically recorded crime category because it falls under a number of other offences, and as such it is difficult to establish specific levels. However, CSE in Blackpool remains a significant concern and therefore remains a priority.
- **Sexual offences & rape:** There were 902 Sexual offences recorded in Blackpool during January 2021-December 2021. This was an increase of 37% (+242) compared with the previous 12 months (caveat- some will be non-recent and historical). Rape offences increased by 45% (+97) and Sexual offences on children under the age of 16 have increased by 25% (+71). Lancashire recorded a 26% (+1,021) increase in Sexual offences and a 33% (+386) increase in Rape offences.
- **Domestic abuse:** There were 4,046 Domestic abuse offences recorded in Blackpool during January 2021-December 2021. This was an increase of 14% (+485) compared with the previous 12 months. Lancashire recorded a 9% (+1,999) increase in Domestic abuse offences.
- **Violence against the Person (VAP):** There were 10,759 Violence against the Person offences recorded in Blackpool during January 2021-December 2021. This was an increase of 21% (+1,875) compared with the previous 12 months. Lancashire recorded a 13% (+6,700) increase in Violence against the Person.
- **Hate crime:** There were 422 Hate offences recorded in Blackpool during January 2021-December 2021. This was an increase of 21% (+72) compared with the previous 12 months. Lancashire recorded a 6% (+157) increase in Hate crime.
- **Reducing re-offending:** The current reoffending rate for Blackpool (Jan 2019 – Dec 2019) is 25.9% which is slightly lower than the pan-Lancashire figure of 26.2%.

Anti-Social Behaviour (ASB) Overview

Monthly totals for ASB incidents in Blackpool from April 2019.



There were 12,197 ASB incidents recorded in Blackpool during January 2021-December 2021. This was a decrease of -8% (-1,133) compared with the previous 12 months. Lancashire recorded an -11% (-9,508) decrease in ASB.

The above chart shows monthly totals for ASB incidents incorporating pre-pandemic figures (2019), due to covid-19 restrictions/lockdowns being in place during 2020 and part of 2021, this has had an effect on ASB levels.

Thanks to collaborative working across partner agencies and the easing of coronavirus restrictions, towards the end of 2021 (August onwards) the number of incidents recorded each month started to fall and are now below pre-pandemic figures.

Strategic Assessment of data

The Lancashire Strategic Assessment is a rigorous process which uses research and analysis to compile a long term picture of the issues and threats facing Lancashire as a county.

Unitary authorities, and districts then develop their own Strategic Assessment Local Profiles, which identify the threats that are then used to agree the priorities for the Community Safety Plan. Delivery plans are then developed accordingly to articulate the actions to be undertaken to address the priorities.

The strategic assessment uses the MoRiLE (Management of Risk in Law Enforcement) tool to assess risk. The MoRiLE risk assessment process has been used to rank the various threats and issues identified.

The MoRiLE tool and the ONS CSSDT were both used to form the Lancashire Strategic Assessment and the Blackpool Strategic Assessment Local Profile.

Lancashire Profile

The 2021 Lancashire Strategic Assessment identified the following key risks and threats:

- Domestic Abuse
- Violence
- Exploitation – criminal and sexual
- Serious Organised Crime
- Road Safety

Police Crime Commissioner (PCC) Priorities:

In December 2019, the PCC, Andrew Snowden, and New Chief Constable Chris Rowley, launched the 2021- 2025 Police and Crime Plan which sets the strategic direction for crime-related and policing services across Lancashire, including the response to regional and national threats.

There are five priorities within the Police and Crime Plan:

- Getting tough on Anti-Social Behaviour
- Disrupting and Dismantling Organised Crime
- Tackling Domestic Abuse and Sexual Violence
- Cracking down on Burglary and Robbery
- Targeting Dangerous Drivers

Blackpool Local District Profile:

The 2021 Blackpool Strategic Assessment Local Profile identified the following priorities:

- ASB
- Domestic Abuse
- Violence
- Road Safety
- Sexual Assault and Rape
- Child Criminal and Sexual Exploitation
- Burglary and Robbery
- Serious and Organised Crime (County Lines, Modern Day Slavery/Human Trafficking and Illicit Trade)

The analysis provided in the 2021 District Profile for Blackpool and the Lancashire Strategic Assessment 2021, highlighted the following as threats and points of focus:

Vulnerabilities

As substantial contributory factors for child criminal and sexual exploitation, sexual offences, domestic abuse, violent crime and hate crime

- Children and young people are vulnerable to a number of crimes, including criminal and sexual exploitation and violent crime especially involving drugs
- Sexual offences such as rape, were identified as crimes of high risk using the MoRiLE methodology and high levels of harm using the ONS CSSDT
- The elderly population (65+ years), which is expected to increase, are particularly vulnerable to domestic abuse, fraud, health related injury and antisocial behaviour
- Reports of domestic abuse are increasing, creating further demands on services
- Alcohol is a common factor in violent crimes, 34% of violence against the person offences in the town centre are alcohol related
- Almost one fifth of hate crime in Lancashire occurred in Blackpool
- Mental health has become an increasing demand on services and more collaborative approaches are being developed to deal with mental health and substance misuse (also known as dual diagnosis).
- County Lines features as a significant risk and threat in Lancashire

Drugs, alcohol and mental health

As substantial contributory factors for begging, residential burglary and antisocial behaviour

- Alcohol and drugs are common factors relating to antisocial behaviour
- Public perceptions showed that areas of significant concern were begging and drugs (including spice)
- Residential burglary was found to be a crime associated with high levels of harm
- Mental health is reported to be a factor in almost half of high risk antisocial behaviour cases
- Reduce re-offending

Serious Organised Crime

Linked to modern day slavery, human trafficking, illicit trade and drug dealing

- Prostitution in Blackpool is often linked to modern day slavery and pop up brothels
- Human trafficking has been identified as a risk across Lancashire using the MoRiLE methodology
- Activity associated with Serious Organised Crime (SOC) has been increasing in Blackpool, particularly with regards to County Lines, which mainly involves drug dealing

What the residents of Blackpool have to say

In line with the statutory requirement from the 1998 Crime and Disorder Act, residents in Blackpool were consulted on the draft priorities for the community safety plan in order to ascertain if they agreed with the proposed priorities, or wished to suggest others.

Methodology

Questions relating to the Community Safety Partnership priorities were asked using three approaches- an online shared survey link, face-to-face interviews during a public engagement activity in Blackpool town centre and paper questions that were distributed in Blackpool Council's public facing buildings. The survey link was distributed via leaflets during the engagement week and shared on the council's social media pages, including Facebook and Twitter, throughout December and early January. The consultation was open for five weeks from 6 December 2021 to 9 January 2022.

Results

A total of 94 responses were received to the consultation, with 74 online responses, 14 face-to-face responses and 6 responses from paper questionnaires. The results of the survey showed that 97.8% of respondents ranked Violent Crime and Anti-social behaviour as very important or quite important priorities, followed by 95.5% who ranked Domestic Abuse, and Sexual assault and Rape as very important or quite important priorities.

	Very important	Quite important	Neither important nor unimportant	Quite unimportant	Very unimportant	Don't know/not sure
Anti-social behaviour (Base = 91)	83.5% (76)	14.3% (13)	1.1% (1)	-	-	1.1% (1)
Child sexual exploitation (Base = 89)	79.8% (71)	11.2% (10)	3.4% (3)	2.2% (2)	-	3.4% (3)
Child criminal exploitation (Base = 89)	79.8% (71)	10.1% (9)	5.6% (5)	1.1% (1)	-	3.4% (3)
Domestic abuse (Base = 90)	73.3% (66)	22.2% (20)	4.4% (4)	-	-	-
Sexual assault and rape (Base = 89)	83.1% (74)	12.4% (11)	2.2% (2)	-	-	2.2% (2)
Violent crime ¹ (Base = 91)	89% (81)	8.8% (8)	2.2% (2)	-	-	-
Serious and organised crime² (Base = 91)	75.8% (69)	17.6% (16)	4.4% (4)	-	1.1% (1)	1.1% (1)
Road safety ³ (Base = 93)	60.2% (56)	33.3% (31)	6.5% (6)	-	-	-

¹ Includes weapon enabled, domestic/youth/sexual and physical violence

² Includes county lines, modern day slavery and human trafficking/illicit trade

³ Includes road traffic collisions, parking and speeding, nuisance motorbikes, highways obstructions and drink-driving 'Base' refers to the total number of responses for each question (Base = 94)

2022 – 2025 PRIORITIES



Drugs, alcohol and mental health

- Begging
- Residential burglary
- Antisocial behaviour
- Reduce re-offending



Serious Organised Crime

- Modern day slavery
- Human trafficking
- Illicit Trade
- Drugs with Harm



Vulnerabilities

- Violent Crime
- Child Criminal and Sexual Exploitation
- Sexual Offences and Rape
- Domestic Abuse
- Hate Crime
- ASB



Road Safety

- This area of work will be led by Highways and traffic Management Division, working in conjunction with the Lancashire Road Safety Partnership.

Our local priorities were identified by the Local District Profile, which were then used in our public and stakeholder consultation exercise. The above priorities have been agreed by the Community Safety Partnership and the community. The priorities identified in this plan will be used to identify actions that will create a safer environment for residents and visitors to be evident in Lancashire.

The Community Safety Plan works towards supporting communities in line with the priorities and strategic approach adopted by Blackpool Council. In striving to retain our position as the UK's number one family resort, one of the council's priorities is to create stronger communities whilst increasing resilience, through delivering core services and partnership working in order to develop a better town.

In addition to these priorities, counter terrorism is identified as a point of further focus for the Community Safety Partnership on account of it being an area of national importance.

How we will address these priorities:

Currently there are a number of active multi-agency groups, which can be found on page 3, who are working in many of the priority areas and will further develop action plans over the life of the plan to address the priorities. In addition, there are plans to establish working groups to address highlighted priorities not already covered such as violence, burglary and robbery. It is important to note that where required, the analytical product victim offender location model is used to problem solve particular priorities.

An operational overachieving action plan covering the main issues from the various groups will be established in 2022/2023, which will be monitored by the Community Safety Partnership.

Counter Terrorism

Although counter terrorism is not identified as a specific priority in this plan, it will remain a focus for the partnership as outlined in previous plans.

The current threat level for international terrorism in the UK is categorised at 'severe', which means that a terrorist attack is highly likely. The terrorist threats which the UK now face are more diverse than ever before making the situation unpredictable and leading to potentially more frequent, less sophisticated terror attacks. In October 2010 the government published a National Security Strategy, CONTEST. This has been updated multiple times since and sets out the threats to the UK and the priorities for dealing with these.

On the 1st July 2015, the Counter Terrorism and Security Act 2015 came into effect. The Act places a duty on specified authorities to have 'due regard to the need to prevent people from being drawn into terrorism'. The specified authorities are local authorities, people, prisons, young offender institutions, providers of probation services, schools, colleges, universities and NHS bodies.

The Specified Authorities must:

- Assess the risk of radicalisation in their area or institution
- Develop and action plan to reduce this risk
- Train staff to recognise radicalisation and extremism
- Work in partnership with other partners
- Establish referral mechanisms
- Maintain records and reports to demonstrate compliance

The four main areas of work identified in the most recent 2018 CONTEST strategy are:

- **Prevent:** to stop people becoming terrorists or supporting terrorism
- **Pursue:** to stop terrorist attacks
- **Protect:** to strengthen our protection against a terrorist attack
- **Prepare:** to mitigate the impact of terrorism attack

Further details are then provided on what each Specified Authority must do to comply with the Act.



Domestic Homicide Reviews (DHR)

It is a statutory requirement for Community Safety Partnerships to conduct and oversee domestic homicide reviews.

The purpose of the DHR is to:

Establish what lessons are to be learned from the domestic homicide regarding the way in which local professionals and organisations work individually and together to safeguard victims;

- **Identify** clearly what those lessons are both within and between agencies, how and within what timescales they will be acted on, and what is expected to change as a result;
- **Apply** these lessons to service responses including changes to inform national and local policies and procedures as appropriate;
- **Prevent** domestic violence and homicide and improve service responses for all domestic violence and abuse victims and their children by developing a co-ordinated multi-agency approach to ensure that domestic abuse is identified and responded to effectively at the earliest opportunity;
- **Contribute** to a better understanding of the nature of domestic violence and abuse;
- **Highlight** good practice.

The narrative of each review should articulate the life through the eyes of the victim (and their children) and talking to those around the victim including family, friends, neighbours, community members and professionals.

A successful DHR should go beyond focusing on the conduct of individuals and whether procedure was followed to evaluate whether the procedure / policy was sound.

- Does it operate in the best interests of victims?
- Could an adjustment in policy or procedure have secured a better outcome for the victim?

This investigative technique is sometimes referred to as professional curiosity. It is a thoroughly inquisitive approach to a review and impact on the tone of the report and the detail in the learning can be dramatically improved by adopting this mind-set.

DHRs are not inquiries into how the victim died or into who is culpable; that is a matter for coroners and criminal courts, respectively, to determine as appropriate. DHRs are not specifically part of any disciplinary inquiry or process.

The rationale for the review includes ensuring that agencies are responding appropriately to victims of domestic abuse by offering and putting in place appropriate support mechanisms, procedures, resources and interventions with an aim to avoid future incidents of domestic homicide and violence.

Partner support

Partnership working is at the core of the Community Safety Partnership. All statutory partners must work together to agree on outcomes and actions in order for the process to run effectively and for the priorities to be addressed.



How to contact the Community Safety Team



Email: communitysafety@blackpool.gov.uk

This page is intentionally left blank

Report to:	EXECUTIVE
Relevant Officer:	Alan Cavill, Director of Communications and Regeneration
Relevant Cabinet Member:	Councillor Neal Brookes - Cabinet Member for Enforcement, Public Safety, Highways and Transport
Date of Meeting:	25 April 2022

LOCAL TRANSPORT PLAN PROGRAMME 2022/2023 - 2024/2025

1.0 Purpose of the report:

1.1 To consider the 2022/2023 - 2024/2025 Local Transport Plan Programme, which includes Integrated Transport Block and Highways Maintenance Block elements and the complementary Potholes Fund highways maintenance allocation, all grant allocations from the Department for Transport as notified late-February 2022.

2.0 Recommendation(s):

2.1 To approve the proposed three year Local Transport Plan programme 2022/2023 - 2024/2025 attached at Appendix 3a with effect until 31 March 2025.

2.2 To grant authority to the Director of Communications and Regeneration, following consultation with the Cabinet Member for Enforcement, Public Safety, Highways and Transport, to vary the programme as required to deliver overall objectives and ensure spend of the grant allocations.

3.0 Reasons for recommendation(s):

3.1 In order that an objective-led Local Transport Plan programme is put in place.

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

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

4.0 Other alternative options to be considered:

4.1 None.

5.0 Council priority:

5.1 The relevant Council priorities are both:

- The economy: Maximising growth and opportunity across Blackpool.
- Communities: Creating stronger communities and increasing resilience.

6.0 Background information

6.1 The Department for Transport (DfT) notified Blackpool Council of its Local Transport Plan capital allocations in late-February 2022, as follows:

Funding Stream	2022/23 Allocation	2023/24 Allocation*	2024/25 Allocation*
Integrated Transport Block	£1,733,000	£1,733,000	£1,733,000
Highways Maintenance Block needs element	£667,000	£667,000	£667,000
Highways Maintenance Block incentive element	£167,000	£167,000	£167,000
Potholes Fund	£667,000	£667,000	£667,000
Total payment	£3,234,000	£3,234,000	£3,234,000

*Indicative for 2023/24 and 2024/25, subject to the results of the proposed local authority engagement referred to below.

6.2 Funding amounts provided are for the financial year 2022/2023, to be spent over two financial years, and indicative for financial years 2023/2024 and 2024/2025. The Department For Transport will be seeking to build on the existing approach to incentivising local highway authorities. To this end, a formal series of engagements will follow during the course of 2022 with the outcome expected in advance of the 2023/2024 financial year.

6.3 The programme that has been developed is in support of the following agreed strategic Local Transport Plan objectives:

- Objective 1 - Improve, maintain and make best use of Blackpool's transport network; in particular its roads, footways and bridges.
- Objective 2 - Improve road safety by interventions that reduce the number of people, particularly children, killed and seriously injured on Blackpool's roads.
- Objective 3 - Manage congestion levels on Blackpool's roads, especially where it impacts on local economic performance.
- Objective 4 - Improve transport to and within the resort, particularly by more sustainable modes, to enhance the visitor experience and support the local economy.
- Objective 5 - Improve the efficiency and management of parking to support the local economy, especially for shoppers and visitors.
- Objective 6 - Improve access to healthcare, education, employment, shops, social/leisure opportunities and resort attractions, particularly by sustainable modes.

- 6.4 In line with the Council's approved Capital Programme procedures, a corporate top slice of 12.5% is applied to the Integrated Transport Block and Highways Maintenance Block capital allocations.
- 6.5 The highway maintenance elements and Potholes Fund are to address the maintenance backlog on the road network through the Project Amber initiative and ensure inspections of bridges and structures are up to date. There is a contribution to the ongoing Project 30 repayments and an allocation for staff costs to support the programme.
- 6.6 The Integrated Transport Block funded programme comprises the following elements:
- **Road safety measures** - priorities to be identified at a local level and through the Lancashire Road Safety Partnership.
 - **Traffic control and highway network enhancements** - to manage congestion, whilst ensuring quality facilities for public transport, walking and cycling.
 - **Project Amber road maintenance** - additional funding to repair and improve essential roads.
 - **Public realm enhancements** - small-scale schemes to be identified.
 - **Parking provision and management** - mainly to renew signing and lining, with any demand for residents' parking schemes to be considered on a case-by-case basis.
 - **Bus infrastructure** - primarily to upgrade bus stops and renew ageing bus shelters.
 - **Walking and cycling** - responding to Government initiatives on active travel, progressing a Local Cycling and Walking Infrastructure Plan.
 - **Monitoring** - primarily for manual and automatic traffic, cycling and pedestrian counts.
 - **Programme and scheme development** - to fund potential scheme feasibility work, which can place schemes 'on the shelf' for when funding opportunities arise.
 - **Electric Vehicle (EV) charging infrastructure** - introducing new facilities for residents and visitors to use.
 - **Staff costs** - to support the programme.
- 6.7 Does the information submitted include any exempt information? No

7.0 List of Appendices:

7.1 Appendix 3a: Three year Local Transport Plan programme 2022/2023 - 2024/2025.

8.0 Financial considerations:

8.1 The programme must be monitored effectively to ensure that it is delivered overall and that each year's allocation is spent over two financial years.

9.0 Legal considerations:

9.1 None.

10.0 Risk management considerations:

10.1 There are no risk management issues relating to the programme overall. Risk management procedures would be completed for the individual projects within the programme, using the Council's established procedures.

11.0 Equalities considerations:

11.1 There are no negative equalities impacts anticipated from the programme's delivery. Improving transport around the town, particularly by sustainable modes, would help to promote equality.

12.0 Sustainability, climate change and environmental considerations:

12.1 By promoting sustainable travel modes and encouraging more efficient travel patterns, the programme will have a positive sustainability effect.

13.0 Internal/external consultation undertaken:

13.1 The programme is carefully considered during its development, with reference to known stakeholder issues. The agreed programme will be tabled at the Highways Consultative Forum.

14.0 Background papers:

14.1 None.

15.0 Key decision information:

15.1 Is this a key decision? Yes

15.2 If so, Forward Plan reference number: 6/2022

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

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

16.0 Call-in information:

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

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

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

17.0 Scrutiny Committee Chairman (where appropriate):

Date informed: 13 April 2022 Date approved:

18.0 Declarations of interest (if applicable):

18.1

19.0 Summary of Discussion:

19.1

20.0 Executive decision:

20.1

21.0 Date of Decision:

21.1

22.0 Reason(s) for decision:

22.1

23.0 Date Decision published:

23.1

24.0 Alternative Options Considered and Rejected:

24.1

25.0 Executive Members in attendance:

25.1

26.0 Call-in:

26.1

27.0 Notes:

27.1

APPENDIX 3a

Local Transport Plan Programme 2022/2023 - 2024/2025			
<i>£,000s</i>			
	2022/2023	2023/2024 indicative	2024/2025 indicative
Highways Maintenance Block	834	834	834
Corporate top slice	104	104	104
Total Highways Maintenance Block	730	730	730
Objective 1: Maintenance			
Bridges and structures	75	100	125
Project 30 repayment	223	163	103
Project Amber road maintenance	417	452	487
Staff costs	15	15	15
Potholes Fund	667	667	667
Total maintenance	1397	1397	1397
Integrated Transport Block	1733	1733	1733
Corporate top slice	217	217	217
Total Integrated Transport Block	1516	1516	1516
Objective 2: Road safety			
Road safety measures	90	90	90
Objective 3: Congestion			
Traffic control and highway network enhancements	400	400	400
Objective 4: Economy			
Project Amber road maintenance	200	200	200
Public realm enhancements	280	280	280
Objective 5: Parking			
Parking provision and management	25	25	25
Objective 6: Accessibility			
Bus infrastructure	195	195	195
Cycling and walking	130	130	130
Supporting items			
Monitoring	21	21	21
Programme and scheme development	10	10	10
Electric Vehicle charging infrastructure	150	150	150
Staff costs	15	15	15
Total spend	2913	2913	2913

This page is intentionally left blank

Report to:	EXECUTIVE
Relevant Officer:	Jane Saleh, Head of Planning Strategy
Relevant Cabinet Member:	Councillor Lynn Williams, Leader of the Council and Cabinet Member for Tourism and Culture
Date of Meeting :	25 April 2022

ADOPTION OF GREENING BLACKPOOL SUPPLEMENTARY PLANNING DOCUMENT (SPD)

1.0 Purpose of the report:

1.1 This report presents the Greening Blackpool Supplementary Planning Document for adoption (Appendix 4a refers) and the Greening Blackpool SPD – Consultation Statement (Appendix 4b refers) for publication on the website, the latter setting out all the representations received and the Council’s proposed response.

Public consultation on the Draft Greening Blackpool SPD took place during September and October 2021 and 14 responses were received.

The Greening Blackpool Supplementary Planning Document provides direction on the importance for new development to fully consider landscaping and green infrastructure; and detailed guidance on the implementation of relevant policies in the Blackpool Local Plan Part 1: Core Strategy including Policy CS6: Green Infrastructure; and the Part 2: Site Allocations and Development Management Policies document.

The Supplementary Planning Document has also been informed by the local plan evidence base documents as well as other relevant council policy and strategy as set out on in the document

Once adopted this Supplementary Planning Document will be a material consideration when assessing relevant planning applications.

2.0 Recommendation(s):

2.1 To approve and formally adopt the Greening Blackpool Supplementary Planning Document at Appendix 4a to the Executive report.

- 2.2 To approve and agree for publication the supporting Greening Blackpool Supplementary Planning Document Consultation Statement at Appendix 4b to the Executive report.
- 2.3 To authorise the Head of Planning Strategy to make any appropriate minor amendments to improve the presentation and finalise a published version of the Greening Blackpool Supplementary Planning Document (at Appendix 4a to the Executive report).

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.

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

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

4.0 Other alternative options to be considered:

4.1 To not approve the Supplementary Planning Document but these would not provide guidance for applicants and the Council's Planning Committee in seeking to support Blackpool's future regeneration and growth.

5.0 Council priority:

5.1 The relevant Council priority is both:

- "The economy: Maximising growth and opportunity across Blackpool"
- "Communities: Creating stronger communities and increasing resilience"

6.0 Background information

6.1 Provision of Green Infrastructure in urban areas delivers benefits not only to the environment but also to the development of better places. It supports health and wellbeing, sustains biodiversity and wildlife and provides greater climate change resilience. In order to deliver the green infrastructure that Blackpool needs, it is important that new development also contributes to a greater provision.

6.2 The key aims of the Supplementary Planning Document are to:

- ensure Blackpool plays its part in the national effort to tackle climate change;
- ensure Blackpool is prepared for the consequences of climate change;
- assist in meeting the national aspiration of increasing overall tree cover in urban areas;
- contribute to the nations efforts to hit net zero carbon emissions by 2050;
- contribute towards the government’s target of planting one million trees in England’s towns and cities by 2022;
- assist in increasing the tree canopy cover in Blackpool from 4.4% to 10% by 2027 (approximately 10,000 trees);
- contribute towards the aims and objectives of Blackpool’s Tree Strategy 2020- 2030, Blackpool’s Air Quality Strategy 2020-2025 and Blackpool’s Joint Health and Wellbeing Strategy 2016-2019 (or as updated); 11
- assist in increasing the quality and functionality of Green and Blue Infrastructure across Blackpool and the wider Fylde Coast;
- assist in the implementation of the Green and Blue Infrastructure Framework including the Tree Strategy and the recommendations in the Open Space Assessment and Playing Pitch Strategy;
- ensure that all Blackpool residents and visitors have access to a wide range of high quality landscapes and green infrastructure features that meet local green space and play standards to facilitate quality of life, health and wellbeing;
- assist businesses to flourish in attractive environments which encourages private investment, increased footfall and repeat visits;
- ensure that biodiversity and trees are fully considered at an early stage of the development process;
- ensure that every opportunity is taken to provide environmental and biodiversity net gains from development;
- promote best practice for proposals incorporating trees and green infrastructure within new developments, applying ‘the right tree in the right place’ principles.

6.3 Draft SPD Consultation

A six-week consultation on the Draft Greening Blackpool Supplementary Planning Document was undertaken between Monday 6th September and Monday 18 October 2021 in accordance with Regulation 13 of the Town and Country Planning (Local Development) (England) Regulations 2012 and the adopted Statement of Community Involvement. This is detailed in the Consultation Statement (Appendix B refers).

Around 1200 organisations and individuals (including statutory bodies, key stakeholders and members of the public) were invited to make representations on the draft Supplementary Planning Document. Fourteen responses were received including representations from the Environment Agency, United Utilities, the Lancashire Wildlife Trust and Fylde Council.

The aims and overarching principles of the Supplementary Planning Document acknowledging the benefits of green infrastructure provision were generally supported however, the following broad issues were raised in the representations received:

- Concern over the requirements for replacement trees not sufficiently taking into account land use efficiency and site constraints and that greater flexibility is required reflective of Policy DM21 : Landscaping in the Blackpool Local Plan Part 2;
- Concern that the proposed replacement tree requirement of two semi mature trees to be planted in place for every tree lost was disproportionate particularly in relation to the replace of Category C¹ trees;
- Lack of justification in the Supplementary Planning Document on how the offsite planting contribution has been calculated;
- Concern over the level of financial contributions that are proposed for offsite provision of green infrastructure particularly the £1000 contribution per tree and the impact this may have on development viability;
- Concern over the open space requirements which were considered high; and that the proposed requirement should be more reflective of the site typologies and take into account existing open space close to proposed development.

¹ CATEGORY C – Trees of a low quality with an estimated remaining life expectancy of at least 10yrs, or young trees with a stem diameter below 150mm.

- The Supplementary Planning Document needs to better incorporate the requirements of the upcoming 2021 Environment Act, specifically the requirement for 10% Biodiversity Net Gain.

Some comments received did not directly relate to the Greening Blackpool Supplementary Planning Document and included issues related to vandalism; sports facilities, playing pitch provision and surface water management. As appropriate, these comments have been forwarded to the relevant Council Department for consideration.

Full detail of the representations received and the Council’s proposed responses is set out in the Consultation Statement at Appendix 4b.

6.4 Does the information submitted include any exempt information? No

7.0 List of Appendices:

7.1 Appendix 4a– Greening Blackpool Supplementary Planning Document

Appendix 4b – Greening Blackpool Supplementary Planning Document – Consultation Statement

8.0 Financial considerations:

8.1 The preparation of the documents is being undertaken within existing budgetary provisions. The Supplementary Planning Document is being resourced by existing staff within the Planning Strategy Team.

9.0 Legal considerations:

9.1 The Greening Blackpool Supplementary Planning Document provides additional information to assist with the interpretation and implementation of the Blackpool Local Plan Parts 1 and 2, which form part of the Council’s statutory Development Plan. Furthermore, since the SPD is informative, it is potentially very helpful for applicants in the pre-application stage making the process even more transparent and open.

10.0 Risk management considerations:

10.1 No adverse risks will arise from the adoption and subsequent publication of the Greening Blackpool Supplementary Planning Document.

11.0 Equalities considerations:

11.1 No adverse equalities considerations. The Greening Blackpool Supplementary Planning Document will contribute to the Council priorities set out in the Council Plan.

12.0 Sustainability, climate change and environmental considerations:

12.1 Sustainability, climate change and the environment are key considerations that have been taken into account in developing the Blackpool Local Plan Part 1 Core Strategy and Part 2: Site Allocations and Development Management Policies to which the Greening Blackpool Supplementary Planning Document relates. The Greening Blackpool Supplementary Planning Document will assist in helping to deliver on the Council's Climate Change Declaration and Climate Change Action Plan

13.0 Internal/external consultation undertaken:

13.1 Consultation has been 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.

14.0 Background papers:

14.1 Blackpool Local Plan Part 1: Core Strategy (adopted January 2016)
Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (Submission) document (January 2021)

15.0 Key decision information:

15.1 Is this a key decision? Yes

15.2 If so, Forward Plan reference number:

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

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

16.0 Call-in information:

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

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

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

17.0 Scrutiny Committee Chairman (where appropriate):

Date informed: 13 April 2022 Date approved:

18.0 Declarations of interest (if applicable):

18.1

19.0 Summary of Discussion:

19.1

20.0 Executive decision:

20.1

21.0 Date of Decision:

21.1

22.0 Reason(s) for decision:

22.1

23.0 Date Decision published:

23.1

24.0 Alternative Options Considered and Rejected:

24.1

25.0 Executive Members in attendance:

25.1

26.0 Call-in:

26.1

27.0 Notes:

27.1

This page is intentionally left blank



Greening Blackpool
Supplementary Planning
Document

Adopted April 2022



If you would like to contact someone about this document please telephone or email the Planning Strategy Team at:



01253 476239



planning.strategy@blackpool.gov.uk

Contents

Climate Change Emergency Declaration	5
--	---

Part 1: Introduction and Background

1.0 Introduction	8
The aim of this Supplementary Planning Document.....	9
2.0 Green Infrastructure	12
What is Green Infrastructure?.....	12
Economic Issues	16
Social Issues	17
Environmental Issues.....	18
3.0 Policy Framework	21
National Planning Policy Framework.....	21
Local Plan Policy	22
Duty to Co-operate and cross boundary green infrastructure.....	25

Part 2: Requirements for Green Infrastructure in Blackpool

4.0 Summary of Requirements	27
All New Development.....	29
Trees and Hedgerows.....	29
Biodiversity Requirements.....	31
Protected Species.....	33
Sites of Special Scientific Interest (SSSI).....	33
Biological Heritage Sites.....	34
Surface Water Management and Drainage	34
On Site and Off Site Provision	36
All New Residential Development	36
New Build Commercial and Leisure Development.....	38
5.0 Other Information related to the Planning Application Process	39
Pre Application Advice.....	39

S106 and S278 agreements and the use of conditions	39
Viability.....	40
APPENDICES	41
APPENDIX A: Supporting evidence and strategies.....	42
APPENDIX B: National Policy and Legislation	50
APPENDIX C: Native Shrubs and Trees which are suitable in the North West:	51
APPENDIX D: Biological Heritage Sites (BHSs)	59
APPENDIX E: Development that will require an Ecological Assessment or Species Survey	61

Climate Change Emergency Declaration

On the 27th June 2019, Blackpool Council declared a climate change emergency.

The Council notes:

- That the impacts of climate breakdown are already causing serious damage around the world;
- That the 'Special Report on Global Warming of 1.5°C' published by the Intergovernmental Panel on Climate Change in October 2018:
 - (a) describes the enormous harm that a 2°C average rise in global temperatures is likely to cause compared with a 1.5°C rise, and
 - (b) confirms that limiting Global Warming to 1.5°C may still be possible with ambitious action from national and sub-national authorities, civil society and the private sector;
- That all governments (national, regional and local) have a duty to act, and local governments that recognise this should not wait for their national governments to change their policies;
- That strong policies to cut emissions also have associated health, wellbeing and economic benefits; and
- That, recognising this, a growing number of UK local authorities have already passed 'Climate Emergency' motions.

The Council therefore commits to:

- Declare a 'Climate Emergency' that requires urgent action;
- Make the Council's activities net-zero carbon by 2030;
- Achieve 100% clean energy across the Council's full range of functions by 2030;
- Ensure that all strategic decisions, budgets and approaches to planning decisions are in line with a shift to zero carbon by 2030;
- Support and work with all other relevant agencies towards making the entire area zero carbon within the same timescale;
- Ensure that all Council led leadership teams embed this work in all areas and take responsibility for reducing, as rapidly as possible, the carbon emissions resulting from the Council's activities, ensuring that any recommendations are fully costed and that the Executive and Scrutiny functions review council activities taking account of production and consumption emissions and produce an action plan within 12 months, together with budget actions and a measured baseline;

- Request that Council Scrutiny Committees consider the impact of climate change and the environment when reviewing Council policies and strategies;
- Work with, influence and inspire partners across Blackpool, Lancashire and the North West to help deliver this goal through all relevant strategies, plans and shared resources by developing a series of meetings, events and partner workshops;
- Request that the Council and partners - not least the Council's wholly owned companies, take steps to proactively include young people in the process, ensuring that they have a voice in shaping the future;
- Request that the Cabinet Member with responsibility for Climate Change convene a Citizens' Assembly before the end of the calendar year, in order to involve the wider population in this process. This group would help develop its own role, identify how the Council's activities might be made net-zero carbon by 2030, consider the latest climate science and expert advice on solutions and to consider systematically the climate change impact of each area of the Council's activities;
- Set up a Climate Change Partnership group, involving Councillors, residents, young citizens, climate science and solutions experts, businesses, Citizens Assembly representatives and other relevant parties. Over the following four years, the Group will consider strategies and actions being developed by the Council and other partner organisations and develop a strategy in line with a target of net zero emissions by 2030. It will also recommend ways to maximise local benefits of these actions in other sectors such as employment, health, agriculture, transport and the economy;
- Report on the level of investment in the fossil fuel industry that our pensions plan and other investments have, and review the Council's investment strategy to give due consideration to climate change impacts in the investment portfolio;
- Ensure that all reports in preparation for the 2020/2021 budget cycle and investment strategy will take into account the actions the council will take to address this emergency;
- Call on the UK Government to provide the powers, resources and help with funding to make this possible, and ask local MPs to do likewise;
- Consider other actions that could be implemented, including (but not restricted to): renewable energy generation and storage, providing electric vehicle infrastructure and encouraging alternatives to private car use, increasing the efficiency of buildings, in particular to address fuel poverty; proactively using local planning powers to accelerate the delivery of net carbon new developments and communities, coordinating a series of information and training events to raise awareness and share good practice;
- Furthermore, this Council makes clear its fundamental opposition to the practice of fracking. The Council will not allow its land to be used for fracking; and

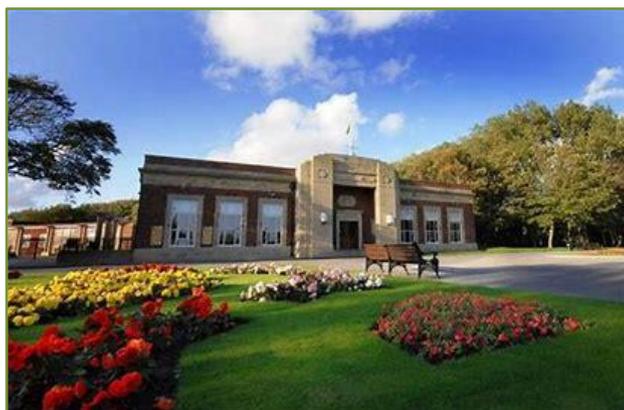
- Finally, via the Local Government Association, the Council will invite in a group of experts to advise on what steps can be taken quickly to have the greatest possible impact on air quality, modal shift away from private cars, increased take up on public transport, and ensure that every aspect of the Council's activities are sighted on the need to preserve Blackpool's ecological and environmental heritage.

Blackpool Council recognises the important contribution that planning can make to both climate change mitigation and adaptation and protecting and enhancing biodiversity, through plan making and decision taking.

Part 1: Introduction and Background

1.0 Introduction

1.1 This Supplementary Planning Document (SPD) provides direction on the importance for new development to fully consider landscaping and green infrastructure, including open space, sports and play facilities, amenity greenspace, public art, biodiversity and trees. It sets out more detailed guidance on the implementation of relevant policies in the Blackpool Local Plan, Part 1: Core Strategy and Part 2: Site Allocations and Development Management Policies document.



Stanley Park

1.2 The SPD has been informed by local plan evidence base documents as well as other relevant council policy and strategy including:

- Blackpool Climate Change Emergency Declaration 2019;
- The Green and Blue Infrastructure Strategy (The Environment Partnership 2019);
- The Green and Blue Action Plan (The Environment Partnership 2019);
- The Green and Blue Infrastructure Framework Technical Report (The Environment Partnership 2017);
- [Blackpool's Open Space Assessment](#) [PDF 13,159KB] (The Environment Partnership 2019);
- The Blackpool Playing Pitch Strategy and Action Plan (Update 2021)
- The Blackpool Local Plan, Part 2 Economic Viability Assessment (Lambert Smith Hampton 2020)

1.3 Further information on the above documents and the context they provide for this SPD is summarised in [Appendix A](#).

1.4 This SPD has been produced in accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the guidance set out in the National Planning Policy Framework (2019). The full range of documents comprising the Local Plan are available on [the Council's website](#) (opens a new window).

1.5 This document is a material consideration when assessing relevant planning applications.

The aim of this Supplementary Planning Document

1.6 The provision of Green Infrastructure in and around urban areas contributes towards creating places where people want to live, work and invest; delivering benefits not only to

the environment but also to the development of better places. Green infrastructure planning increases access to good quality open spaces, mitigates and adapts to climate change by contributing to urban cooling and flooding resilience, benefits biodiversity and wildlife, allows greater appreciation of valued landscapes and heritage buildings and supports health and wellbeing. Where high quality Green Infrastructure is maintained and enhanced, it supports community cohesion and provides vulnerable residents with opportunities to build social networks.

1.7 Blackpool faces unique challenges associated with high levels of deprivation, poor public physical and mental health, the intensely urban nature of its built form, poor quality housing stock, low educational attainment and high seasonal unemployment. A shortage of green infrastructure, particularly in the Inner Area and Town Centre compounds the public health deficit in the town. The Council is working hard to improve housing and revitalise and restructure the Town Centre, seeking opportunities to create pocket parks, plant trees and green the town, making it a more pleasant and healthy place to live, work, visit and invest. Making the urban environment greener, helping to tackle climate change and protecting and enhancing the natural environment and resources is a vital part of delivering a better Blackpool.

1.8 Much of the green infrastructure in the public realm, on streets and around highways will be provided by the Council, Public Health and through grant funding. However, in order to deliver the green infrastructure that Blackpool needs, it is important that new development also contributes to a greater provision.

1.9 The aim of this SPD is to;

- ensure Blackpool plays its part in the national effort to tackle climate change;
- ensure Blackpool is prepared for the consequences of climate change;
- assist in meeting the national aspiration of increasing overall tree cover in urban areas;
- contribute to the nations efforts to hit net zero carbon emissions by 2050;
- contribute towards the government's target of planting one million trees in England's towns and cities by 2022;
- assist in increasing the tree canopy cover in Blackpool from 4.4% to 10% by 2027 (approximately 10,000 trees);
- contribute towards the aims and objectives of Blackpool's Tree Strategy 2020-2030, Blackpool's Air Quality Strategy 2020-2025 and Blackpool's Joint Health and Wellbeing Strategy 2016-2019 (or as updated);
- assist in increasing the quality and functionality of Green and Blue Infrastructure across Blackpool and the wider Fylde Coast;

- assist in the implementation of the Green and Blue Infrastructure Strategy and Action Plan including the Tree Strategy and the recommendations in the Open Space Assessment and Playing Pitch Strategy;
- ensure that all Blackpool residents and visitors have access to a wide range of high quality landscapes and green infrastructure features that meet local green space and play standards to facilitate quality of life, health and wellbeing;
- assist businesses to flourish in attractive environments which encourage private investment, increased footfall and repeat visits;
- ensure that biodiversity and trees are fully considered at an early stage of the development process;
- ensure that every opportunity is taken to provide environmental and biodiversity net gains from development;
- promote best practice for proposals incorporating trees and green infrastructure within new developments, applying 'the right tree in the right place' principles.

2.0 Green Infrastructure

What is Green Infrastructure?

2.1 Green infrastructure is a network of multifunctional green space, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

2.2 The physical components of green infrastructure can range from large-scale areas of public open space such as coastal habitats and countryside areas to smaller scale provision in the form of street trees, allotments, domestic gardens, green roofs and walls and Sustainable Drainage Systems (SuDS). Examples of green infrastructure include:

- Parks and gardens
- Natural and semi-natural urban green spaces
- Green corridors
- Outdoor sports facilities
- Amenity greenspace
- Provision for children and teenagers
- Allotments
- Cemeteries and churchyards
- Accessible countryside areas
- Civic spaces and market squares
- Green roofs, walls and trees
- The beach and Promenade
- Coastal habitats
- Bodies of water
- Road side verges and embankments
- Street trees
- Woodlands
- Domestic gardens

2.3 Green infrastructure can also include hard-landscaped areas, such as Blackpool's promenade, which forms an integral part of the town's green infrastructure network.



Blackpool Beach and Promenade

2.4 Trees are an integral part of green infrastructure and the largest natural living elements in the landscape. They are landscape features in their own right. They provide infinite varieties of colour, form and textural interest. Trees help to soften the hard lines of built structures integrating them into the landscape. They can be used to frame views, or provide a focal point.

2.5 Street trees and garden trees in urban areas provide multiple benefits from acting as a green barrier to screen busy roads, railway lines or industrial sites, reducing summer temperatures, assisting in storm water attenuation, improved air quality, oxygen production, carbon storage, reduced noise as well as their biodiversity, amenity and aesthetic value.

2.6 Trees have proven benefits for mental and physical wellbeing, providing vital ready contact with the natural world, and sometimes providing a source of food. Trees help to give our urban areas beauty and character. Where streets, open spaces and gardens have trees present, these areas tend to be the most sought after and property values are very often higher than areas without trees. There is ample evidence which proves that an attractive landscape and local environment really matters to the people that live and work there.

2.7 Trees have a critical role in dealing with the effects of climate change. Not only do trees and woodland absorb and store carbon, they can also help to keep urban areas cool and shaded. They play a part in reducing both the risk and effects of flooding by slowing the flow of surface water runoff and increasing groundwater infiltration rates. Trees also reduce soil erosion from wind and rain and increase soil fertility, which is essential for agricultural production.

2.8 In addition to the benefits already listed, planting trees alongside watercourses, where appropriate, can provide shade and help keep watercourses cool. In prolonged hot weather oxygen levels can fall which can lead to the death of aquatic species, especially fish.

2.9 The Forestry Commission have published a document – ‘The Case for Trees’¹ which further illustrates the many benefits of trees, including in an urban context.

2.10 Section 197, Part VIII of the Town and Country Planning Act 1990 requires planning permission to include appropriate provision for the preservation and planting of trees.

2.11 The protection of trees is enshrined in planning legislation, and trees are considered material to all planning applications. Blackpool Council is therefore statutorily obliged to consider the welfare of trees in the development process including the requirement to plant more trees.

¹ [The Case for Trees](#) by the Forestry Commission

The need to green Blackpool

“The role of green infrastructure in addressing the challenges of the 21st century cannot be underestimated. It is a natural, service-providing infrastructure that is often more cost effective, more resilient and more capable of meeting social, environmental and economic objectives than ‘grey’ infrastructure.”

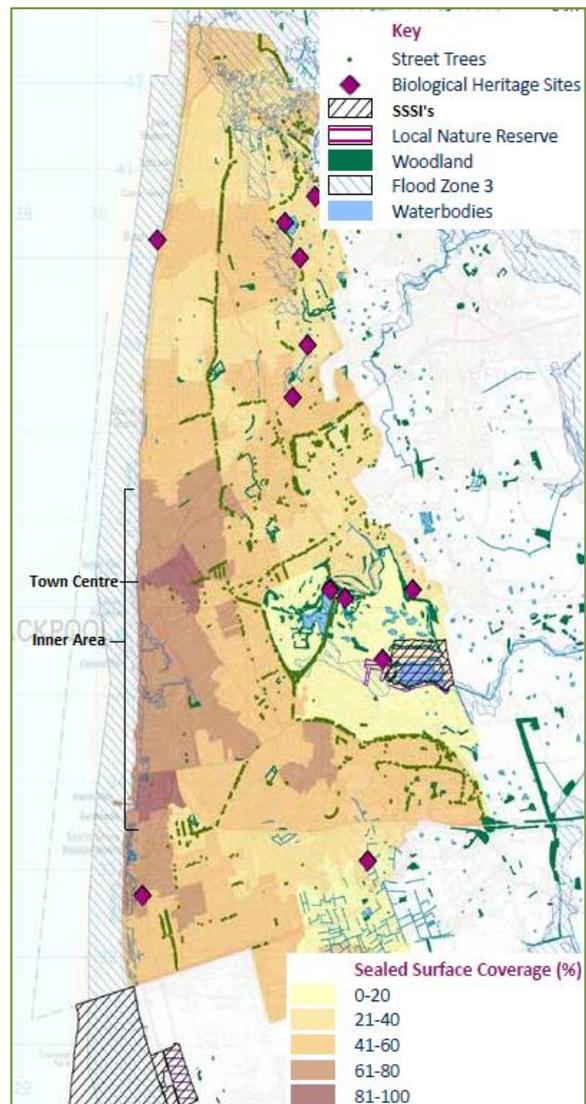
Green Infrastructure: An integrated approach to land use, Landscape Institute Position Statement 2013.

2.12 In 2018, Blackpool ranked as the seventh most densely populated area in England outside of Greater London. The population is heavily concentrated in Blackpool’s Inner Area, which is intensely compact characterised by many poor quality rented bedsits and flats in multiple occupation, the legacy of converted guest houses no longer needed as holiday accommodation as overnight visitor numbers declined in the 1970’s and 80’s. This has resulted in very dense and grey urban environments in the Inner Area.

2.13 At the heart of Blackpool is the Town Centre and Resort Core, which has little green infrastructure. Elsewhere in the Inner Area, there is very little open space apart from the Promenade and beach. The Town Centre is the main retail and cultural centre for the Fylde Coast, employs over 6,000 people and generates a retail turnover of around £300 million per annum. However, the Town Centre is under performing as a sub-regional retail centre.

2.14 Employment in Blackpool is generally seasonal, low skill with minimum wage. Blackpool attracts low income and vulnerable households which, when concentrated within certain areas, has a negative effect on forming stable and cohesive communities. The high levels of crime, anti-social behaviour, worklessness and low educational attainment coupled with significant transience presents one of the most testing social and economic challenges in the country.

2.15 The health of people in Blackpool is generally worse than the national average. The



Sealed surface map from the Green and Blue Infrastructure Strategy

town records one of the lowest life expectancy rates nationally and there are inequalities by deprivation and gender. Health priorities in Blackpool include alcohol and drug misuse, mental health, smoking and obesity. A high percentage of working age residents claim Incapacity Benefit (over 12%), which is almost double the national average. Public Health in Blackpool is within the remit of Blackpool Council.



Stanley Park

2.16 Nine out of the 21 wards in Blackpool fall significantly short of the standard of 4 hectares of open space per 1,000 population (or 40 square metres per person) as recommended in the 2019 Open Space Assessment, including Claremont, Talbot, Brunswick, Tyldesley, Victoria, Waterloo (all in the Inner Area), Hawes Side, Highfield and Squires Gate. The Open Space Assessment confirms that there are few opportunities for providing additional open space in the Inner Area due to the high density of development.

2.17 Blackpool has the lowest tree canopy cover in the UK at just 4.4%², where the national average for an authority is around 16%, despite the Council having recently planted 3,000 trees in streets and parks and in creating woodland at Low Moor Road, Mossom Lane, Deerhurst Road and Kingscote Park.

2.18 Green infrastructure has a vital role to play in Blackpool's development, for example enhancing the quality of arrival for visitors, providing places for cultural events, providing a high quality setting for the towns heritage buildings and conservation areas, increasing physical activity, creating opportunities for community activity, tackling stress and mental health problems and enhancing biodiversity and landscape quality.

2.19 Blackpool is going through a period of sustained transformation with previous successful environmental, economic and social regeneration projects. These include the improved public realm on the Central Corridor, Promenade and St Johns Square; restoration works at Blackpool Tower and the Winter Gardens; housing regeneration at Rigby Road and Queens Park; and delivery of phase 1 of the Central Business District. Several other major projects are underway including the tramway extension and phase 2 of the Central Business District; the Quality Corridors scheme; the conference centre; the Blackpool Airport Enterprise Zone; and an extension to Hounds Hill Shopping Centre to include retail and, restaurant development and an IMAX style cinema. Looking forward, the Council has ambitions to improve the Town Centre and link it through to a major leisure development on the former Central Station site now known as Blackpool Central.

² [Urban Tree Cover in Blackpool](#)

2.20 Continuing regeneration within the Town Centre, the Resort Core and the Inner Area is crucial to strengthen the economy, balance the housing market and address the challenges associated with the high levels of deprivation and poor health in the town.

2.21 The economic, social and environmental benefits that can come from providing and enhancing green infrastructure have been understood and acknowledged for some time.

2.22 It is widely acknowledged that high quality environs with high quality green infrastructure, promotes economic growth and investment and health and wellbeing as well as increasing biodiversity and helping to mitigate against climate change.

2.23 The [Infrastructure and Delivery Plan \(IDP\) 2014 \[PDF 8,788KB\]](#) for the [Blackpool Local Plan Part 1: Core Strategy \(Core Strategy\)](#) and subsequent update for the [Local Plan Part 2](#) (opens a new window) seek to establish what additional infrastructure and service needs are required to support the overarching strategy for new homes and jobs in the Borough to 2027.

2.24 The term 'infrastructure' includes 'physical' infrastructure such as road and rail needs, flood alleviation, electricity and gas supply, and waste water; 'social' infrastructure such as education, health and community facilities and 'green' infrastructure such as parks, playing fields, allotments, public open space and footpaths/cycle ways. The Council's approach to seeking developer contributions towards infrastructure provision, including green infrastructure, is set out in Policy CS11 of the Core Strategy.

Economic Issues

2.25 The most direct economic argument for green infrastructure is that it adds value. This includes the improvement of the town's image, helping to attract and retain high value industry, businesses, entrepreneurs and skilled workers. Green infrastructure enhances the appeal of a location for investment which can help to attract, create and safeguard new jobs and start-up businesses. Green infrastructure can also play a vital role in combating the sometimes poor perceptions of Blackpool from outside.



Blackpool Airport Enterprise Zone

2.26 The lack of future development land within Blackpool makes it essential to provide better quality employment sites. Providing green infrastructure raises land and property values, attracts and retains investment and stimulates economic activity. Also, working in or near to green spaces motivates staff and improves their health, resulting in fewer sick days and increased productivity.

2.27 The Enterprise Zone at Blackpool Airport is a key employment site with the potential to create 5,000 jobs over the next 25 years. Having good quality landscaping in and around the Enterprise Zone is imperative in order to provide the good quality environment that will attract investment to assist in maximising the employment and economic potential of the site.

2.28 Similarly, greening the Town Centre and providing public art and improved civic spaces will make the Town Centre more attractive to visitors and shoppers and will attract private investment, new shops and businesses and boost tourism, which is the lifeblood of the town's economy.

2.29 Core Strategy Policy CS10 requires all new non-residential development over 1,000 square metres to achieve BREEAM 'very good' (or any future national equivalent). Green Infrastructure has a role to play in achieving credits for many BREEAM performance categories such as energy, transport, water use, pollution, land use and ecology, materials and innovation.

Social Issues

2.30 Blackpool experiences high levels of transience in and around the town, with people struggling to put down roots and settle. Providing good quality green spaces and places with sufficient green infrastructure encourages more frequent and longer visits to those places, which can create strong attachments, foster a sense of pride of place and support positive social interactions, assisting the social integration between different social groups.

2.31 Children in Blackpool have typically lower educational attainment compared to national averages and green infrastructure can be used as a valuable education resource for schools and parents to teach children about the environment, habitats, food production and healthy activities. As such, green infrastructure has the potential to improve educational achievement, eventually helping to create a better qualified and more highly skilled workforce, and to bring higher salaries and more valuable business investment into the area whilst improving outcomes for children growing up in Blackpool.

2.32 The mental and physical health of people in Blackpool is generally worse than the national average and the town records one of the lowest life expectancy rates nationally. The lack of green infrastructure in the Inner Area correlates strongly with wards suffering the worst levels of poor mental and physical health. Health priorities in Blackpool include reducing obesity and improving mental health.

2.33 A growing evidence base, reflected in national policy, suggests that spending on health care could be reduced if greater investment was made in preventing ill health before it has a chance to occur and that there are positive effects that access to good quality landscapes and green infrastructure has on health and wellbeing and the negative affects

when that access is restricted. Blackpool Council are actively targeting childhood obesity with measures including a 'Walk to' project. Twenty eight primary schools and five secondary schools have signed up to the Living Streets programme which encourages school children to walk to school. Work is also underway with the business community to engage active travel across the town.

2.34 In addition, providing communities with the opportunity to grow their own food has multiple health benefits from exercise, social and environmental interaction and access to healthy food.

2.35 Exposure to high air pollution can cause and exacerbate respiratory problems, heart disease and cancer. Trees and vegetation can reduce air pollution directly by trapping and removing fine particulate matter and indirectly by reducing air temperatures.

2.36 Traffic calming measures can take on many forms, but the benefits of using green infrastructure is by far the best method which has multiple benefits and added value. Slower traffic is safer for pedestrians and cyclists. Having green and pleasant streets and green corridors encourages walking and cycling and can assist in reducing obesity, can improve physical and mental health and reduce social isolation and health inequalities in Blackpool.

2.37 Open space and green infrastructure both in and close by to new housing development is important to create healthy and resilient communities, to create community resources and contributes towards the provision of good quality homes where people want to live.

2.38 Green infrastructure can also conserve and enhance the setting of the towns cultural and heritage assets and provide good quality landscaped links between them. These assets are fundamental to the town as a tourist destination and are also cherished by the people of Blackpool.

Environmental Issues

2.39 Climate change is a global challenge which requires action at every level.

2.40 Providing green infrastructure can assist in absorbing carbon dioxide and can mitigate the effects of climate change, such as water attenuation during extreme weather events, reducing flooding and can cool the urban environment during heat waves.

2.41 In urban areas, the impermeable materials used for roads, pavements and car parking mean that rain is not absorbed and remains on the surface. During periods of heavy rainfall this water accumulates and when the drainage capacity of the area is exceeded, localised flooding will occur.

2.42 Also, a high level of surface water run-off washes pollutants away from the surfaces it falls onto, transporting them into watercourses. This can be detrimental to water quality in the sea, streams, rivers and lakes and lead to high pollutant loading at water treatment facilities.

2.43 Blackpool's sewerage system is a combined system (one carrying both foul and surface water), resulting in large volumes of rainwater finding its way into the sewer network. The combined pressures of population growth and more intense storm events are likely to increase the load on existing infrastructure, leading to more frequent spills from the combined sewer overflows of Manchester Square and Anchorholme pumping stations in to the sea. Given that the waters around these outfalls are bathing waters, there is a need to reduce the impact of these events not only to improve bathing water quality but to minimise the risk of serious damage to property and inconvenience to the public through surface water flooding.

2.44 Soft landscaped surfaces and Sustainable Urban Drainage Systems (SuDS) are able to intercept and store water, reducing the volume of surface water run-off and can filter out pollution. SuDS utilise natural features like porous pavements, filter trenches, grassed ditches, bio retention areas and ponds to enable either complete infiltration of surface water into the ground or to significantly reduce peak flows entering sewer systems by attenuating flows before final discharge.

2.45 In Blackpool, local air quality is largely dominated by traffic emissions and there is one Air Quality Management Area (AQMA) in the town centre, which was declared in 2005. Pollution levels are monitored to determine the success of measures implemented through the resulting Air Quality Action Plan. An updating and screening exercise was undertaken borough-wide in 2014, which showed no further AQMA designations were necessary.

2.46 Green infrastructure and trees can have a positive impact on air quality by removing common pollutants such as ammonia, carbon dioxide, nitrogen oxide, ozone, particulate matter and sulphur dioxide. Tree planting and greening the Town Centre would assist in improving the air quality. This can have positive impacts in terms of climate change mitigation, carbon capture and storage and human health.

2.47 Another ecological benefit of greening urban areas is the contribution it can have towards the preservation and protection of rare and vulnerable species.



SuDS scheme at Moor Park

2.48 Parks and woodlands are able to support the widest range of species, but even small areas of vegetation such as in residential gardens, roundabouts, grass verges and green roofs can support a range of plants, insects and birds.

2.49 Providing green infrastructure can create wildlife corridors, linking together larger green spaces and parks and providing links to rural areas on the outskirts of Blackpool. This facilitates the movement of animals, birds and insects and prevents the fragmentation of habitats, which can be detrimental to biodiversity.

2.50 Urban green spaces form an important habitat for pollinators, such as bees and butterflies. Having a healthy population of pollinators is vitally important as many flowers and crops depend upon them in order to reproduce.

2.51 In development, where meaningful ground level landscaping isn't possible, installing or retro-fitting green roofs, walls and facades should take place where appropriate and viable. It would greatly support biodiversity in Blackpool and contribute towards a network of green corridors around the town. This type of green infrastructure also insulates the building, against extreme temperatures, thereby reducing heating and cooling costs and reducing the carbon footprint of the building. Green roofs can also hold water, reducing the amount of surface water run-off and thereby reducing the requirement of other, more costly hard engineering attenuation measures. Examples of innovative green infrastructure include the green walls at the M&S buildings in Sheffield and Newcastle City Centre and the green wall at Deansgate Metrolink Station, Manchester.



Example green walls

3.0 Policy Framework

National Planning Policy Framework

3.1 The Government updated the [National Planning Policy Framework](#) (opens a new window) (NPPF) in July 2021 and this SPD is prepared in the context of that Framework. The NPPF sets out the Government's planning policies for England and aims to ensure that development is sustainable, recognising that economic, social and environmental matters are mutually dependant and beneficial in creating sustainable development.

3.2 The NPPF requires local authorities to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for the conservation and enhancement of the natural, built and historic environment. These measures include landscaping and green infrastructure and planning measures to address climate change mitigation and adaptation.

3.3 The NPPF confirms that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities and open space. Policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

3.4 The NPPF also directs local authorities to refuse permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

3.5 Paragraph 131 of the NPPF confirms that trees make an important contribution to the character and quality of urban environments and can help mitigate and adapt to climate change. Paragraph 131 requires planning policies and decisions to ensure that new streets are tree lined and that opportunities are taken to incorporate trees elsewhere within developments and that existing trees are retained wherever possible.

3.6 Paragraph 174 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystems, including the economic and other benefits of trees. Paragraph 174 also confirms that development should minimise impacts on and provide net gains for biodiversity and wherever possible, should help to improve local environmental conditions such as air and water quality. Paragraphs 179 – 182 seek to protect and enhance habitats and biodiversity.

3.7 This SPD is also prepared in the context of the National Planning Practice Guidance (NPPG), published in March 2014 and periodically updated, which expands on the NPPF. It defines Green Infrastructure, as a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits. It goes on to state: “Green infrastructure is not simply an alternative description for conventional open space. As a network, it includes parks, open spaces, playing fields, woodlands, but also trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls”. NPPG describes how local authorities should plan for Biodiversity and Geodiversity, provides guidance on ecological networks, ecological evidence, legal obligations for European sites, guidance on local sites, ecosystem services and nature improvement areas. The Planning Process, enhancement of biodiversity, avoiding, mitigating and compensating for significant harm are also included.

3.8 In January 2021, the Government published the [National Design Guide](#) (opens a new window) which identifies the ten characteristics of good design. This document identifies landscaping and green infrastructure as an intrinsic indicator of a well-designed and sustainable place. The Code confirms that development in urban areas should have tree lined streets, planned open spaces, SUDs and other green infrastructure such as green roofs and walls, lower density areas for more natural green spaces and habitats and utilise urban greening factor tools. Further details and guidance on the ten characteristics of good design are set out in the [National Model Design Code](#) (opens a new window) which was also published in 2021.

3.9 Further national context is provided in legislation through the Natural Environment and Rural Communities Act 2006 and the Climate Change Act 2008 and the 2018 Government ‘25 Year Environment Plan’, [Appendix B](#) refers.

Local Plan Policy

3.10 The [Blackpool Local Plan Part 1: Core Strategy](#) [PDF 135.35MB] (Core Strategy) sets out the Vision, Goals and Objectives for Blackpool up to 2027 and is the principal development plan document for Blackpool. The Core Strategy provides an overview of Blackpool’s economy, social, housing and environmental issues, recognising that over 80% of the Borough is developed, with an intensely compact Inner Area which experiences acute levels of deprivation, which has led to communities with extreme health, social and economic inequalities. The Core Strategy confirms that some wards in the Inner Area have the lowest provision of open space in the UK and that open land to the east of the town has important landscape, nature conservation, recreational and environmental value for local communities.

3.11 This Greening Blackpool SPD supports and expands on the following key strategic

local plan policies in the Core Strategy:

Policy CS6: Green Infrastructure:

1. High quality and well connected networks of green infrastructure in Blackpool will be achieved by:

a. **Protecting** existing green infrastructure networks and existing areas of Green Belt. The loss of green infrastructure will only be acceptable in exceptional circumstances where it is allowed for as part of an adopted Development Plan Document; or where provision is made for appropriate compensatory measures, mitigation or replacement; or in line with national planning policy.

In terms of existing open space, sports and recreational buildings and land, including playing fields, these will be protected unless the requirements of paragraph 97 (now 99) of the NPPF are met. In terms of Green Belt areas, the Council will apply national policy to protect their openness and character, and retain the local distinctiveness. There is no planned strategic review of the existing Green Belt boundary during the plan period.

b. **Enhancing** the quality, accessibility and functionality of green infrastructure and where possible providing net gains in biodiversity.

c. **Creating** new accessible green infrastructure as part of new development and supporting urban greening measures within the built environment.

d. **Connecting** green infrastructure with the built environment and with other open space including the creation, extension or enhancement of greenways, green corridors and public rights of way.

2. All development should incorporate new or enhance existing green infrastructure of an appropriate size, type and standard. Where on-site provision is not possible, financial contributions will be sought to make appropriate provision for open space and green infrastructure.

3. International, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary.

Policy CS11: Planning Obligations:

1. Development will only be permitted where existing infrastructure, services and amenities are already sufficient, or where the developer enters into a legal undertaking or agreement to meet the additional needs arising from the development.
2. Where appropriate, planning contributions will be sought in connection with a development to ensure that:
 - a. The particular facilities required for the proposed development, including the provision of necessary infrastructure, services and community facilities are met
 - b. Any damaging impact on the environment or local amenity arising from the proposed development can be overcome.

3.12 Other relevant Core Strategy policies related to green infrastructure include:

- Policy CS1 Strategic Location of Development
- Policy CS5 Connectivity
- Policy CS7 Quality of Design
- Policy CS8 Heritage
- Policy CS9 Water Management
- Policy CS10 Sustainable Design and Renewable and Low Carbon Energy
- Policy CS12 Sustainable Neighbourhoods
- Policy CS15 Health and Education
- Policy CS17 Blackpool Town Centre
- Policy CS19 Central Business District (Talbot Gateway)
- Policy CS20 Leisure Quarter
- Policy CS22 Key Resort Gateways

3.13 **The Local Plan Part 2: Site Allocations and Development Management Policies**³ allocates sites for development and sets out a suite of development management policies to guide appropriate development. Once adopted, this document will replace the saved policies in the Blackpool Local Plan 2001-2016 (adopted in 2006). The Examination of the

³ Part 2 of the Local Plan can be viewed on the [Council's website](#) (opens a new window)

Local Plan Part 2 took place in December 2021. Relevant policies in the Local Plan Part 2 include:

- Policy DM1: Design Requirements for New Build Housing
- Policy DM10: Promenade and Seafront
- Policy DM17: Design Principles
- Policy DM21: Landscaping
- Policy DM25: Public Art
- Policy DM31: Surface Water Management
- Policy DM35: Biodiversity
- Policy DM41: Transport Requirement

3.14 Policy DM21 confirms that development proposals are expected to contribute towards green and blue infrastructure, retain existing green infrastructure; and encourages tree planting and the use of green walls and roofs. The policy also requires high quality boundary treatments which enables the passage of wildlife; restricts hard surfacing of residential gardens; and requires financial contributions where on-site restrictions mean green infrastructure cannot be provided on site to be spent in accordance with this SPD.

3.15 Policy DM35 seeks to protect biodiversity and requires net gains where opportunities exist.

Duty to Co-operate and cross boundary green infrastructure

3.16 Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other and with other prescribed bodies on strategic matters that cross administrative boundaries in preparing their Development Plans. Engagement should also include other bodies including the Local Nature Partnerships.

3.17 This co-operation involves identifying cross boundary strategic priorities and includes collaborating on evidence critical to understanding the needs of local areas and the wider economic and housing market areas.

3.18 In response to the Duty to Cooperate in 2013 Blackpool Council, along with neighbouring authorities of Fylde and Wyre Councils and Lancashire County Council⁴ agreed a [Memorandum of Understanding \(MOU\)](#) [PDF 9,242K] which covers cross boundary issues including surface water drainage; waste water and the natural environment. A key issue in the MOU is “to work together to conserve and enhance natural habitats, biodiversity and landscapes of importance and to develop a strategic network of green infrastructure”. The MOU was updated in 2015.

⁴ Both Wyre and Fylde Councils are local government districts under Lancashire County Council.

3.19 In light of the requirements of the MOU, it is considered important that green infrastructure cross boundary issues are taken into account in the consideration of development proposals which could impact on neighbouring authorities' natural environment.

3.20 The [North West Inshore and Offshore Marine Plan \(June 2021\)](#) (opens a new window) provides the framework to shape and inform decisions over how the area's waters are developed, protected and improved over the next 20 years. In doing so, the plan help to safeguard and enhance the marine environment and biodiversity, improve the well-being of coastal communities and support a strong marine economy. The Marine Plan encourages proposals for development inshore and offshore to apply the environmental net gain approach to development that aims to leave the natural environment in a better state than beforehand.

Part 2: Requirements for Green Infrastructure in Blackpool

4.0 Key Development Requirements

- All development proposals should be able to demonstrate that the biodiversity mitigation hierarchy (avoid, mitigate, compensate) has been followed;
- All development proposals will be required to demonstrate a net gain in biodiversity in accordance with policy DM35: Biodiversity which requires biodiversity enhancements and habitat creation where opportunities exist;
- All BS 5837 Category A, B or C trees should be retained on a development site. If removal of BS 5837 Category A, B or C⁵ trees is unavoidable, each felled tree is to be replaced by 2 semi-mature trees⁶ or in accordance with the Council's Tree Strategy;
- All new residential development (including change of use) providing 3 or more units should provide 40 square metres of open space per person based on average occupancy rates. If the full provision of open space cannot be provided on-site, a financial contribution towards up-grading open space off-site will be required;
- All new residential development (including change of use) providing 3 or more units will be required to provide 2 trees for each dwelling in accordance with the Council's Tree Strategy. If the full provision of tree planting cannot be provided on-site, a financial contribution towards tree planting off-site will be required;
- All new non C3 residential development (including change of use) catering for 3 or more residents will be required to provide 1 tree for each resident. If the full provision of tree planting cannot be provided on-site, a financial contribution towards tree planting off-site will be required;
- All new non-residential development (including change of use) will be required to provide 1 tree for each 100 square metres of floorspace. If the full provision of tree planting cannot be provided on-site, a financial contribution towards tree planting off-site will be required. This could be negotiated depending on

⁵ BS 5837 is the British Standard for trees in relation to construction updated in 2012.

⁶ The British Standards Institution defines semi-mature trees as those with an overall height in excess of 4 metres and/or a stem girth measurement (circumference) of 20 centimetres or larger, when measured 1 metres above the ground.

other proposed innovative greening measures such as green roofs and walls or best practice SuDS with multiple benefits for people and biodiversity;

- Surface level car parking areas to have permeable surfaces and to be well screened and landscaped with green infrastructure;
- Priority will be given to the use of native species;
- Trees should be locally sourced and native species should be prioritised.

All New Development

4.1 It is important that green infrastructure is considered early on in the design process and is central to the design and layout of a development, rather than it being an afterthought or being relegated to 'left-over' land.

4.2 The amount of green infrastructure that can be provided on site will vary considerably between developments and will be influenced by a variety of factors. However, securing greater levels of green infrastructure compared to past developments will be important to provide future economic, social and environmental benefits. Where sites are constrained by a lack of space to provide traditional landscaping, green infrastructure can be provided through green roofs and walls where appropriate and viable and through other innovative approaches, which do not affect the amount of land available for development.

Trees and Hedgerows

4.3 Where trees and/or hedgerows are present on or close to the boundary of a development site, a planning application may need to include the following documents:

- Phase 1 Habitat Survey
- Protected species surveys
- Pre-development Tree Survey
- Arboricultural Impact Assessment (AIA)
- Arboricultural Method Statement (AMS)
- Additional/replacement planting scheme

4.4 New development will be required to retain existing trees covered by categories A, B or C of BS 5837 (BS 5837 is the British Standard for trees in relation to construction updated in 2012). Furthermore, layouts should retain groupings of trees and not fragment them.

This can be important for the long- term safety of the trees, as groups of trees shelter each other in high winds. Linear groups of trees and hedgerows may also be important navigational aids for bats and other wildlife.

4.5 Where the removal of trees covered by categories A, B or C of BS 5837 is unavoidable, the trees must be replaced on a ratio of 2 trees for each category A, B or C tree felled or in accordance with the Council's Tree Strategy.

4.6 The replacement trees should:

- be of a suitable maturity to mitigate the loss of the existing trees;
- be of a local provenance;
- be a native species unless otherwise agreed.

4.7 Where the full provision of replacement tree planting cannot be provided onsite, financial contributions will be sought towards tree planting off-site at a sum of £1000 per tree.

4.8 The 'right tree in the right place' approach should be taken and trees should be planted in the built environment to allow longevity without becoming a nuisance when they reach maturity. The following factors should always be considered when planning a tree planting scheme:

- Planting should provide wildlife links and habitat enhancement;
- There should be adequate space allowed for newly planted trees to reach their full mature height and spread without causing nuisance to adjacent structures and occupants;
- Predicted mature height and canopy spread, canopy density, propensity to shed seeds, fruits and if the tree exudes honeydew, etc.;
- Suitability of trees within the built environment. Trees should always compliment the architecture, historic environment and the local landscape in the longer term. Colour of backdrop should also be taken into consideration, (for example a Silver Birch will not be clearly visible against a light background);
- The suitability of species and planting positions adjacent to structures, such as walls and buildings, to avoid the risk of structural damage as the tree grows and matures. Engineered solutions such as root directors can be used to minimise this;
- The suitability of species in relation to future changes in climate and predicted increase in temperature;
- Provide the maximum benefits for canopy cover, health and well-being, urban cooling and the adaptation of the site and the neighbourhood to climate change;
- Sufficient soil volume should be afforded for the tree to reach its optimum size and;

- Drainage should be such that tree roots are able to grow and function adequately.

4.9 It is important to consider what purpose the tree would serve. If it would form part of a SuDS system, it may be appropriate to choose a thirsty species that does well in boggy ground. If the main purpose of the tree is to provide biodiversity net gain, a variety of species that attracts insects, mammals and birds may be more appropriate. Plant larger species with a fuller canopies in open space and smaller, more manageable species in residential gardens but sufficiently far away from the dwelling to avoid future amenity issues.

4.10 The selection of tree species will also need to be mindful of plant health issues, with a greater number of British native species becoming increasingly threatened by pests and diseases, most of which have entered the UK from abroad and which are likely to thrive as a consequence of climate change. Tree population resilience is likely to be achieved most successfully by introducing a high level of species diversity. Useful advice on this subject is contained in the DEFRA publication [‘Protecting Plant Health – A Plant Biosecurity Strategy for Great Britain’: April 2014](#) (PDF 685KB). Further guidance on species selection is included in the Council’s [Tree Strategy 2020-2030](#).

4.11 It should be noted that the practice of netting trees or hedgerows in or around a development site to prevent nesting birds and bats is not an ethical approach and has a high potential of harming protected species and will be discouraged by the Council.

Biodiversity Requirements

4.12 Biodiversity can be simply defined as the ‘variety of life on earth’ including all plants, animals, fungi and microorganisms. The greater the variety of these lifeforms that live within a habitat, the more biodiverse the environment.

4.13 The human race depends on biodiversity to survive. Life as we understand it is only made possible due to the complex web of interactions between different lifeforms that live on the Earth. We also have a moral duty to respect all forms of life and do our best to protect it. Across the world, biodiversity is in decline. The latest [State of Nature Report](#) (PDF 12,813KB) confirms that biodiversity in the UK has declined by 56% since 1970 and that 15% of our biodiversity is already extinct or threatened with extinction.

4.14 The government’s 25 Year Environment Plan commits to a national Nature Recovery Network (NRN) to restore and enhance a network of wildlife rich places. It is important that development that takes place in Blackpool contributes to the aims and objectives of the NRN where possible and contributes towards an enhanced Lancashire ecological network. Lancashire’s ecological network maps can be obtained from the Lancashire Environment Record Network (LERN). The LERN feeds information about local biodiversity into the

National Biodiversity Network Atlas which contains details of the presence of different species in and around a postcode area and should be used to identify measures to encourage and support biodiversity in new development. So for example, if there have been verified siting's of bats or swifts in an area, bat and swift boxes should be incorporated into the development to support local populations. This information should also inform what should be included in landscaping schemes, for example, to include a body of water or the types of species of plants and trees to be incorporated into a development to provide habitats for amphibians or food source for foraging bats etc.

4.15 Any development has the potential to impact (both negatively and positively) on local biodiversity through its effects on nature conservation features both within the boundaries of the development as well sites adjacent and in certain circumstances a significant distance away. As part of the development process these impacts need to be assessed and (if found to be negative) avoided, mitigated or as a last resort compensated for or planning permission is likely to be refused.

4.16 Developments should not fragment existing habitats, should incorporate beneficial nature conservation features and should deliver a net gain for biodiversity.

4.17 In any case, the inclusion of appropriate green infrastructure will assist biodiversity. In order to achieve the most benefit and provide net gains to biodiversity, the use of native species should be prioritised in landscaping schemes and other green infrastructure. A list of native shrubs and trees are included in [Appendix C](#).

4.18 The introduction of non-native or invasive species can be devastating to local ecosystems. For example, the Rhododendron was introduced to the UK in the 18th Century and is a common feature in residential gardens. However, although it produces attractive flowers, they have few attributes that offset the negative impact it can have.

4.19 Rhododendron is an invasive species which can spread beyond residential curtilages and its presence in woodland has been shown to reduce the numbers of earthworms, birds, animals and plants leading to a reduction in the biodiversity in the area. They can grow very large and a mature plant is very dense and can spread quite quickly, eradicating ground cover plants and interfering with the process of natural regeneration of trees.

4.20 Native species provide the habitat and nourishment that local wildlife requires whilst also providing all of the other benefits of green infrastructure.

Guidance on Biodiversity Net Gain

4.21 Developers should have regard to the latest Planning Practice Guidance on how biodiversity net gain can be achieved as part of the proposed development:

<https://www.gov.uk/guidance/naturalenvironment>.

Further guidance on Biodiversity net Gain is available at the following link: [New guidance issued for Biodiversity Net Gain \(ciria.org\)](https://www.ciria.org/new-guidance-issued-for-biodiversity-net-gain)

Protected Species

4.22 Many species receive special protection under National, European and International legislation. This includes both flora and fauna. Protection by law is afforded to these species and new sites may be found to be or become important as habitats during the life of the development.

4.23 The Lancashire Biodiversity Action Plan produced in April 2001 offers further guidance on what can be done at a local level to maintain and enhance Lancashire's native wildlife.

4.24 The presence of certain newts, bats, butterflies or other protected species is a material planning consideration when considering development proposals which would be likely to harm the species or its habitat. On such sites an expert on the relevant protected species should carry out a site survey, with recommendations on how to safeguard the site or how to mitigate the effects of development if this can be acceptably achieved without adverse harm to the species involved.

4.25 It is essential that the presence or otherwise of protected species, and the extent that they may be affected by a proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making a decision. As such, Blackpool Council does not condition protected species surveys. Where such surveys are required, an application will not be validated in advance of the submission of the relevant survey. If protected species are identified or issues raised during a live planning application, the relevant surveys will need to be submitted otherwise the application could be refused on the grounds of lack of information. All surveys relating to protected species and trees should be undertaken by a suitably qualified and experienced person with the relevant licences.

4.26 Development which is likely to have an adverse impact on protected species will not be permitted.

4.27 With respect to protected species including newts, bats and butterflies new development should look for opportunities to provide new habitat.

Sites of Special Scientific Interest (SSSI)

4.28 Sites of Special Scientific Interest (SSSI) are statutory sites of nature conservation value designated by Natural England and represent the best of the country's habitats.

4.29 Blackpool Council has one SSSI – Marton Mere which was declared an SSSI by the Nature Conservancy Council in 1979 and re-notified in 1984 under the revised legislation contained in the Wildlife Countryside Act 1981. There are strict controls on the operation and use of land within and around Marton Mere.

4.30 The site covers 39 hectares and the water area of the Mere itself covers 18 hectares, which is one of the few remaining natural freshwater sites in Lancashire, supporting a great many species of birds throughout the year. The Council will seek to protect the SSSI and will consult Natural England on any planning applications likely to affect land in the SSSI.

4.31 Marton Mere is also designated as a Local Nature Reserve (LNR) which was declared in 1991 and extended in 1996. The LNR covers most of the area of the SSSI with the exception of land in the north, which lies within Heron’s Reach Golf Course.

4.32 To the south of Blackpool in Fylde, the Star Hill sand dunes are also a SSSI. Where proposed development in Blackpool is assessed to have an adverse impact on this SSSI, the development will not be permitted.

Biological Heritage Sites

4.33 Biological Heritage Sites (BHS) are the most important non statutory wildlife sites in Lancashire. They were derived from a County-wide project undertaken by officers of Natural England, the Lancashire Wildlife Trust and Lancashire County Council which identified a network of key wildlife sites across Lancashire. These sites are important for nature conservation at the county or district level and represent habitats of uncommon quality which are often difficult to recreate. The highly built up nature of Blackpool limits the number of sites of nature conservation interest, increasing the importance of protection of any sites where nature conservation interests are identified.

4.34 Further information on the BHSs and their location across the Borough is set out in [Appendix D](#). These sites are not statutorily protected, but are a material consideration in the planning process.

4.35 Development within or outside of the Biological Heritage Sites which is likely to have an adverse impact on the biodiversity of the Biological Heritage Site will not be permitted.

4.36 Where a development could impact on ecologically sensitive sites or protected species, a phase 1 ecology and/or protected species study will be required. The development scenarios and requirements for such a study are set out in [Appendix E](#).

Surface Water Management and Drainage

4.37 Sustainable drainage systems (SuDS) are an increasingly important part of green infrastructure and when done well, can have multiple benefits for amenity, biodiversity and

reducing flood risk. SuDS minimise surface water run-off and flood risk in an environmentally friendly way by mimicking natural water systems such as ponds, swales and basins. SuDS can integrate seamlessly in wider green infrastructure such as rain gardens, green roofs and infiltration trenches in order to slow water flow rate to reduce flood risk.

4.38 The Blackpool Infrastructure and Delivery Plan identifies the need to reduce the risk of surface water flooding and improve the quality of bathing water in Blackpool.

4.39 Blackpool has an integrated drainage network. In most cases highway drains, watercourse's and culverts connect into the public combined sewer system and during periods of heavy rainfall can overwhelm the design capacity of the integrated drainage network. This further promotes the requirement for sustainable drainage across Blackpool.

4.40 Localised flooding can be reduced through green infrastructure and more directly through SuDS, which reduce surface water runoff and facilitate the retention of rainfall to delay surface water from entering the combined sewer system during high rainfall events. The integration and potential retrofitting of SuDS will contribute to improving water quality, reducing surface water and reducing the impacts of climate change and can additionally provide attractive and valuable green infrastructure assets such as ponds, swales and wetlands. Woodland, trees, vegetation and soils have a role to play in SuDS by aiding in water interception, storage and infiltration while increasing evapo-transpiration. They also can manage pollutants on site and reduce the amount of pollutants entering other waterways and watercourses. SuDS offer attractive opportunities to incorporate tree planting and other vegetation, such as reed beds.

4.41 Green Infrastructure and SuDS can also assist with water retention and groundwater recharge which will become increasingly important given the greater likelihood of drought conditions from climate change, featuring hotter, drier summers.

4.42 The Council will encourage multi-functional SuDS features that include opportunities for landscaping, outdoor activities and play and which provide net gains in biodiversity, whilst helping to ensure local adaptation to climate change. Underground attenuation and flow control systems alone should only be considered on constrained sites where there are no opportunities to incorporate SuDS as green infrastructure. Where opportunities exist, the council expects watercourses to be de-culverted where appropriate.

4.43 Flood risk activities and works (including tree planting) within 8 metres of the top of the banks of a designated main river watercourse (16 metres if it involves quarrying or excavation or if it is a tidal main river) require a permit from the Environment Agency. Main rivers can be identified on the Environment Agency's '[Main River Map](#)'. Works affecting ordinary watercourses (non-main rivers) require the prior consent of the Lead Local Flood Authority.

On Site and Off Site Provision

4.44 The Council's preference is for green infrastructure to be provided on-site as this affords residents, visitors and workers with better and more immediate access to open space and green infrastructure, supports community cohesion and does not place additional pressure on existing green infrastructure. In relation to housing, a significant amount of the Council's new homes supply comes from the conversion of guest houses and hotels where on site provision is challenging and often presents little opportunity to provide open space or tree planting within the development. In these circumstances, creative solutions for on-site green infrastructure would be required and/or contributions towards off-site provision.

4.45 The types of green infrastructure required by a development will be assessed on a case by case basis and dependant on the existing local infrastructure. The guiding principle will be that green space and green infrastructure should be provided in a location where they:

- will best meet the needs of the occupiers of the development
- will contribute towards the creation of green corridors with 500m of the development
- are on main routes between the development site and the Town Centre
- are within the Town Centre itself.

All New Residential Development

Open Space Requirements

4.46 Supplementary Planning Guidance (SPG) 11 (1999) required new housing development to provide a standard of 24 square metres of open space per head of population in accordance with the former National Playing Fields Association '6 Acre Standard', which was a widely used national benchmark standard. The guidance for Outdoor Sport and Play was updated in 2015 to reflect policy changes including the National Planning Policy Framework and now includes recommendations for the provision of amenity and natural green space and confirms that standards should be set locally, depending on local needs.

4.47 The Open Space Assessment 2019 recommends that at least 4 hectares of open space should be provided per 1000 population (40 square metres per head of population) and this is now the adopted benchmark for Blackpool.

4.48 New residential development of more than 3 dwellings, including changes of use, should provide high quality public open space of at least 40 square metres per occupier, as recommended in the 2019 Open Space Assessment.

4.49 Open space should be provided on-site but where this isn't possible, financial contributions will be required towards the upgrade of outdoor sports facilities, children's play space, open space or amenity and natural greenspace in the area, as appropriate. The type of provision will depend on the proximity of existing open space to the development and its quality and other green infrastructure priorities in the area some of which are included in Blackpool's [Green and Blue Infrastructure Strategy](#) and [Action Plan 2019](#) and [Tree Strategy 2021 to 2031](#).

4.50 The open space requirements are based on average occupancy levels of homes in Blackpool from the 2011 Census and are shown in Table 1 below.

Table 1: Open space requirements informed by 2011 Census average household occupancy in Blackpool

Size	Average Occupancy	Total Requirement (40m ² per person)
1 bed	1.2 people	48m ²
2 bed	1.8 people	72m ²
3 bed	2.3 people	92m ²
4+ bed	2.9 people	116m ²

4.51 The cost of providing open space per person is shown in Table 2. This figure has been carried forward and index linked from the 1999 *SPG11, Open Space: provision for new residential development and the funding system*, which has been successfully implemented since its adoption.

Table 2: Open space cost per person

Requirement <u>per person</u> Open Space Assessment 2019	Costs per sq. metre (2019)	Total Cost per person (2019)
40m ²	£24.63	£985.20

4.52 The cost of providing open space per dwelling is shown in Table 3.

Table 3: Cost of open space per dwelling size

Size of dwelling	Average Occupancy (2011 Census)	Cost per person	Commuted Sum 2019
1 bedroom	1.2 people	£985.20	£1,182.24
2 bedroom	1.8 people	£985.20	£1,773.36
3 bedroom	2.3 people	£985.20	£2,265.96
4+ bedroom	2.9 people	£985.20	£2,857.08

Provision of Trees

4.53 In addition to the above requirements, new residential development (including change of use) providing 3 or more units will be required to provide two trees for each new dwelling, to be provided on-site.

4.54 All other residential development outside Use Class C3, for example care homes, children's homes, supported living and including change of use, which cater for 3 or more residents will be required to provide 1 tree for each resident.

4.55 Where the full provision of tree planting cannot be provided onsite, financial contributions will be sought towards tree planting in the area⁷ at a sum of £1000 per tree. This sum will be used to plant a number of trees in a grassed area or will be pooled towards the provision of trees in hard surfaced areas. Trees in hard surfaced areas where there are infrastructure constraints, cost between £7,000 and £15,000 each, depending on the required root system, species, maturity and level of maintenance required.

New Build Commercial and Leisure Development

Landscaping

4.56 All non-residential new build development should provide onsite green infrastructure where possible. Where a site is tightly constrained with lack of space for more traditional landscaping, consideration should be given to the use of green roofs and walls where appropriate and viable.

4.57 Surface level car parking areas should be permeable to assist with surface water drainage, and should be screened by meaningful landscaping and open space, including tree planting where possible.

Provision of Trees

4.58 In addition one tree is required for each 100 square metres of floorspace (or part thereof) to be provided or a financial contribution towards tree planting in the area⁸ at a sum of £1000 per tree for every tree which cannot be provided on site.

⁷ For the purposes of this document, 'in the area' means within 500m of the development site or on main routes between the development site and the Town Centre or within the Town Centre itself.

⁸ For the purposes of this document, 'in the area' means within 500m of the development site or on main routes between the development site and the Town Centre or within the Town Centre itself.

5.0 Other Information related to the Planning Application Process

Pre Application Advice

5.1 It is strongly recommended that developers have early consultation through the pre-application service with the Planning Department in order to ascertain exactly what supporting information is required to accompany a planning application.

5.2 With respect to the requirements set out in this SPD in relation to trees and hedgerows, a professional arboriculture and ecology consultant will be able to provide the documents and plans where required. This information will identify significant trees and the constraints that they impose, which in turn will inform the design of the development. The consultant should also be able to provide details of protection and mitigation measures for the development.

5.3 In addition to ensure high quality landscaping which meets the requirements of this SPD it is recommended that a suitably qualified landscape architect should also be engaged where appropriate.

S106 and S278 agreements and the use of conditions

5.4 The NPPF identifies that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. It highlights that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (paragraph 55).

5.5 Conditions, legal agreements and developer contributions will be used to secure new or enhanced green and blue infrastructure provision on, or associated with, new development. Developers will be expected to provide most aspects of green and blue infrastructure within developments, ensuring that, where possible, they integrate with wider blue and green infrastructure networks.

5.6 A Section 106 (S106) agreement is a legal agreement between the landowner and the local planning authority and are used to mitigate the impact of new development. S106 agreements can require financial contributions for tree planting and green infrastructure off site.

5.7 In September 2019, the Community Infrastructure Levy (Amendment) (England) (No2) Regulations 2019 removed the restrictions on pooling S106 contributions in areas where authorities fall under a threshold based on the tenth percentile of average new build house prices and Blackpool falls into this category. This means that the Council can pool multiple contributions towards larger green infrastructure projects in an area, meaning local communities and new development benefit on a more meaningful scale.

5.8 A section 278 agreement (S278) is a section of the Highways Act 1980 that allows developers to enter into a legal agreement with the Council to make alterations or improvements to a public highway as part of a planning application. This can include tree planting in adopted streets and grass verges on highways.

5.9 In Blackpool, developer contributions will be secured under a S106 agreement or a S278 agreement, to be used towards upgrading public open space, providing or upgrading other types of green infrastructure or tree planting in the area, in the Town Centre or on major routes between the development site and the Town Centre. Should the developer prefer to plant their own off-site street trees under supervision of the Council, these details would be agreed under a S278 agreement. Where a developer plants their own trees in the highway, the developer will be responsible for the maintenance of the trees for a period of time which will be agreed in the S278 agreement.

Viability

5.10 The Council will seek to secure a fair and reasonable developer contribution without adversely affecting the viability of new development in Blackpool. Paragraph 58 of the NPPF states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

5.11 Applicants should take account of policies in development plans and other relevant documents when developing proposals and acquiring land. However, it is recognised that some development proposals may be unable to meet all of the relevant policy and planning obligation requirements whilst remaining economically viable and deliverable. The Council recognises the wider benefits of development, such as regeneration, housing need and employment and will consider requests to reduce the level of planning obligation in viability terms on a case by case basis.

5.12 Such requests must clearly demonstrate to the Council what contributions can be made, the reasons why the development cannot support the full planning obligation requirements, including an open book viability assessment in order for the Council to take it into account as a material consideration.

5.13 The assessment should be submitted, if possible, at the pre-application stage of the planning process to enable the request to be considered and independently verified by the council.

APPENDICES

APPENDIX A: Supporting evidence and strategies

Blackpool's Green and Blue Infrastructure Strategy, Action Plan and Technical Report

A1.1 [The Green and Blue Infrastructure Strategy](#) [PDF 3,336KB] is a 10 year plan to invest in Blackpool's Green and Blue Infrastructure, to enhance existing parks and open spaces and deliver new high quality green spaces and public realm. The Strategy commits the Council to ensure that Green and Blue Infrastructure forms part of all decision making and supports future proofing the town.

A1.2 The Green and Blue Infrastructure Strategy and its accompanying [Action Plan](#) [PDF 774KB] have been developed following comprehensive consultation and review of evidence and the Strategy will guide the Council's actions, large and small, to build a town nationally known for the quality of its open spaces and green infrastructure.

A1.3 The Strategy identifies six strategic goals and implementation priorities for Blackpool's green and blue infrastructure:

A1.4 Goals and Priorities

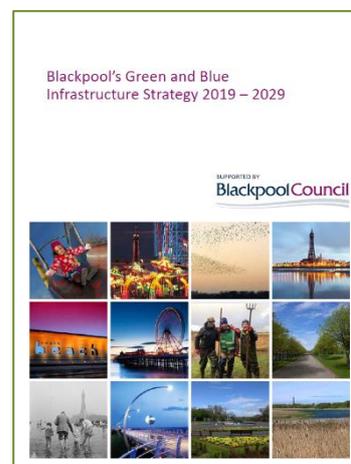
- Engaging People in Health and Wellbeing
- Enhancing the Visitor Experience
- Greener Housing and Infrastructure
- Enabling Productive Businesses and Workers
- Promoting a Green Image and Culture
- Improving Habitats and Benefitting Pollinators

A1.5 The Green and Blue Infrastructure Strategy and Action Plan identify 4 key objectives to tackle the towns lack of trees and green infrastructure, which will provide environmental and health benefits to Blackpool.

A1.6 The objectives include:

Objective 1 – Protect and enhance

- Stanley Park
- Enhance GBI functionality of the outer estates at Mereside, Grange Park
- Invest in parks to bring them Green Flag status
- Enhance Promenade headlands and GBI on the Promenade



- Enhance GBI on road verges along key gateways
- Encourage hedgerows and shrubs to the front of properties

Objective 2 – Create and restore

- Embed GBI in the Town Centre
- Incorporate GBI in the tram extension route between North Pier and Blackpool North Train Station
- Incorporate GBI around the Conference Centre using civic space
- Incorporate GBI in the Leisure Quarter development
- ‘Green’ the Winter Gardens
- Work with local businesses to retrofit GI to their buildings using green roofs and walls
- Incorporate GBI into Talbot Gateway Phase 2
- Increase tree canopy to 10% by planting 10,000 trees by 2027
- Create new open space in the Inner Area
- Create open spaces in the Enterprise Zone
- Create a ‘Green Line’ between Blackpool South Train Station and the Town Centre
- Plant trees on key transport gateways – Yeadon Way, Progress Way, Westcliffe Drive and Talbot Road
- Incorporate SUDS in new development
- Require GBI contributions from new development
- Restore elements of the landscape that contribute to character and biodiversity in Green Belt and Countryside Areas
- Create allotments in the north of Blackpool Council

Objective 3 – Connect GBI

- Include GBI when tendering for contracts
- Create/upgrade Blackpool Activity Trail
- Cross boundary GBI provision working with Fylde and Wyre

Objective 4 – Promote the benefits of GBI

- Provide GBI information to communities, telling them about their local green spaces and how to get involved and volunteer
- Ensure planning applications for car parking in front gardens, maintains GBI
- Encourage local businesses to take stewardship of local green spaces
- Identify green gyms, cook and eat opportunities and green prescriptions
- Establish a Men in Sheds Network for Blackpool Council
- Encourage community led environmental stewards, Friends Groups, Beach Guardians, Tree Wardens

- Promote the use of GBI by schools

Blackpool's Open Space Assessment 2019

A1.7 The purpose of the Open Space Assessment [PDF 13,159KB] is to assess the quantity, quality and accessibility of existing provision of open space in Blackpool, including outdoor sports facilities. It builds on and updates existing studies; assesses future needs; and develops locally derived standards.

A1.8 The Open Space Assessment forms part of the evidence base informing Local Plan Part 2: Site Allocations and Development Management Policies, this SPD and any forthcoming Neighbourhood Plans.

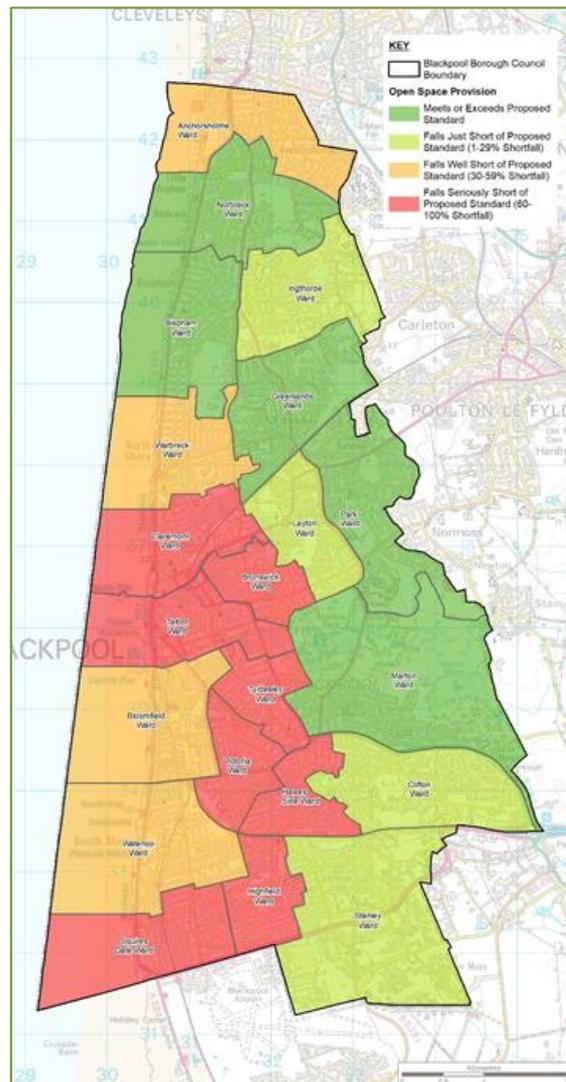
A1.9 This Assessment notes that approximately 74% of Blackpool is developed and that there is limited open space in Blackpool, with some wards having the lowest provision in the UK.

A1.10 165 areas of open space are identified in Blackpool, from Parks, natural and amenity greenspace, play facilities and sports facilities. Only 1% of those sites (1 site) is assessed as being of excellent quality and 13% (13 sites) are assessed as being of poor quality.

A1.11 The existing provision in Blackpool is 4.3 ha per 1,000 population compared to 5.05 ha per 1,000 population national benchmark standards.

A1.12 The Open Space Provision by Ward Map (Figure 40 of the document) summarises the open space quantity provision for each ward against the proposed standard of 4.0 ha of open space per 1,000 population. Wards fall into the following categories:

- Meets or Exceeds Proposed Standard;
- Falls Just Short of Proposed Standard (1-29% Shortfall);
- Falls Well Short of Proposed Standard (30-59% Shortfall); or
- Falls Seriously short of Proposed Standard (60-100% Shortfall).



Map from the Open Space Assessment 2019 showing significant deficiencies in open space in and around the Inner Area

A1.13 There are 21 wards within Blackpool. Five wards meet or exceed the proposed standard and four wards fall just short of the proposed standard. Four wards fall well short of the proposed standard and eight wards fall seriously short of the proposed standard.

A1.14 Wards within the Defined Inner Area and to the south west of Blackpool fall seriously short of the proposed standard. Marton Ward, which comprises Stanley Park and Marton Mere SSSI, is shown to meet or exceed the proposed open space standard.

A1.15 Open space provision in wards along the eastern fringe of Blackpool is generally higher than to the west, this is probably due to the urban nature of the west of Blackpool.

Draft Playing Pitch Strategy Update 2021

A1.16 The vision in the Playing Pitch Strategy is to ensure Blackpool has the appropriate provision of playing pitch community facilities to promote active sport and provide exercise opportunity for all.

A1.17 The Strategy explains that the existing position for all sports pitches is current demand is being met for grass pitches with some small levels of spare capacity for some sports. There is a need for additional 3G pitch provision to meet Football Association requirements; there is a small quantitative shortfall in the future for 5v5 mini football pitches; and some qualitative issues related to overplay and overmarking of pitches. Therefore there is a need to protect existing playing field sites to meet current and future demand; maximise the use of sites where there is capacity to mark out additional pitches; secure community access of sites where this does not currently exist; create access to new provision such as school playing fields where there is a need to do so; and where lapsed sites have been identified as housing allocations in the Local Plan Part 2 consideration of paragraph 99 of the NPPF and exception 4 will need to be had to provide appropriate mitigation informed by the Playing Pitch Strategy when the sites come forward through the planning process.

A1.18 This report identifies ONS data which projects that the population in Blackpool will fall by over 2700 people by the end of the plan period (2027). This data feeds into the calculation for future demand of playing pitches by type, along with the number of participating teams, sporting trends, feedback from sport clubs and national bodies.

A1.19 The aims of the Strategy are:

Aim 1 - To **protect** the existing supply of playing pitches where it is needed for meeting current and future needs

Recommendations:

- a. Protect playing field sites through local planning policy where they are needed for meeting current and future needs to 2027.

- b. Secure tenure and access to sites for high quality, development minded clubs, through a range of solutions and partnership agreements.
- c. Maximise community use of education facilities where there is a need to do so.

Aim 2 - To **enhance** playing fields, pitches and ancillary facilities through improving quality and management of sites

Recommendations:

- d. Improve and sustain quality of pitches
- e. Adopt a tiered approach (hierarchy of provision) for the management and improvement of sites.
- f. Work in partnership with stakeholders to secure funding.

Aim 3 - To **provide** new playing pitches where there is current or future demand to do so.

Recommendations:

- g. Rectify quantitative shortfalls in the current pitch stock.
- h. Identify opportunities to add to the overall stock to accommodate both current and future demand

Blackpool Tree Strategy 2021-2031

A1.20 This strategy recognises the importance of trees, the benefits they afford us and the ever important role they can play in improving our community's mental wellbeing, socio-economic value, providing a home for our local wildlife and mitigating environmental issues. As we currently only have 4.4% tree cover within the borough, their future cannot be taken for granted; climate change, pests and disease, development, agricultural practices and misplaced perceptions of risk are just some of the challenges our remaining trees face. The Tree Strategy will also deal with Tree Preservation Orders (TPO), Conservation Areas, felling licenses, restrictive covenants, woodlands and amenity/ecosystem enhancements.

Blackpool Town Centre Strategy March 2013

A1.21 The Blackpool Town Centre Strategy⁹ outlines a vision for the Town Centre in 15 years' time and includes 6 objectives:

⁹ [Blackpool Town Centre Strategy 2013](#)

- Re-establish the Town Centre as the first choice shopping destination for Fylde Coast residents.
- Strengthen the Town Centre as a vibrant leisure, entertainment, cultural and business tourism destination for residents and visitors.
- Grow the Town Centre as a place to do business by creating a Central Business District and creative industries hub.
- Create a choice of high quality homes within and around the Town Centre.
- Improve the quality of buildings, streets and spaces and their maintenance and management.
- Provide convenient access to the Town Centre by all modes of travel and enable easier pedestrian movement.

A1.22 The Strategy seeks to improve the Town Centre through a range of initiatives, including public realm improvements and actions are proposed to introduce soft landscaping and trees in areas needing public realm improvements. The Strategy also looks to improve links between the Town Centre, the beach and the Promenade.

Blackpool Quality Corridors Scheme

A1.23 The aim of the Quality Corridors Scheme, funded by Blackpool Council and the Lancashire Enterprise Partnership (LEP), is to help make the town centre more attractive to shoppers, residents and investors and is part of a bigger programme of works to ‘Make Blackpool Better’. The project which has seen enhancements to streets in and around the Town Centre, including paving and road renewal, new street furniture, public art and grants to improve shop fronts and street tree planting.

A1.24 Streets which have already benefited from this investment include Cookson Street, Church Street, Dickson Road, Talbot Road, Topping Street, Wood Street, Deansgate, Edward Street and Leopold Grove.

Blackpool Joint Strategic Needs Assessment

A1.25 The purpose of the Joint Strategic Needs Assessment (JSNA¹⁰) is to pull together in a single, on-going process all the information that is available on the health and wellbeing of the people of Blackpool.



Green infrastructure vision in the Enterprise Zone

A1.26 The JSNA includes a Local Authority Health Profile (July 2018) which confirms that the health of people in Blackpool is generally worse than the England average.

¹⁰ [Blackpool Joint Strategic Needs Assessment](#)

Blackpool Joint Health and Wellbeing Strategy

A1.27 The Joint Health and Wellbeing Strategy¹¹ confirms the role of physical activity in improving both physical and mental health in both adults and children in Blackpool. Reducing isolation and providing opportunities to socialise would also have health benefits for residents. Building community resilience is one of the key themes running through the Strategy, which confirms that £1.6 million (to 2021) will be spent improving parks and open spaces in consultations with the community, to improve emotional wellbeing and build community resilience.

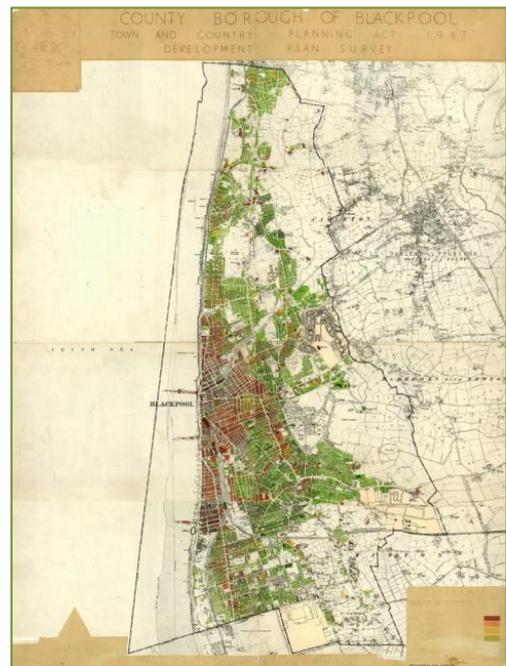
Blackpool Built Heritage Strategy 2016-2020

A1.28 The [Built Heritage Strategy](#) [PDF 3,268KB] was adopted in 2016. The vision in the Strategy states:

‘To ensure that the distinctive heritage of Blackpool is fully appreciated and recognised and that this strategy and associated action plan will seek to protect, conserve and enhance its built heritage for the overall benefit of the community’

A1.29 The Strategy confirms that any development or regeneration scheme proposals in conservation areas or in the setting of listed and locally listed buildings, should respect the defined character of the area and the buildings and aim to actively enhance that character.

A1.30 Any opportunity to improve the historic public realm as a result of development or regeneration schemes should be taken.



Map from 1947 in response to the Town and Country Planning Act.

Local Government Declaration on Healthy Weight

A1.31 The [Declaration on Healthy Weight](#) (opens a new window) acknowledges that environments contribute to sedentary lifestyles and that planning can have a significant impact on opportunities for physical activity, promoting safer environments for walking, cycling and recreation.

Lancashire Environment Record Network (LERN)

A.1.32 Lancashire’s ecological network maps can be obtained from the [Lancashire Environment Record Network \(LERN\) website](#) (opens a new window). The LERN feeds

¹¹ [Blackpool Joint Health and Wellbeing Strategy](#)

information about local biodiversity into the National Biodiversity Network Atlas which contains details of the presence of different species in and around a postcode area and should be used to identify measures to encourage and support biodiversity in new development. As part of an emerging Nature Recovery Network, the Lancashire, Manchester and North Merseyside Wildlife Trust are currently gathering evidence to feed into a [Nature Recovery Network map](#) (opens a new window) for Lancashire which will further inform future planning policy and decision making on planning applications.

APPENDIX B: National Policy and Legislation

B1.1 Section 40 (1) of the [Natural Environment and Rural Communities Act 2006](#) (opens a new window) (NERC) states that a public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Section 40 (3) of NERC confirms that conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

B1.2 [The Climate Change Act 2008](#) (opens a new window) provides the framework both for mitigating climate change by reducing greenhouse gas emissions and for adapting to climate change. Local Planning Authorities are also required under the [Planning Act 2008](#) (opens a new window) to adopt proactive strategies to mitigate and adapt to climate change.

B1.3 In January 2018, the Government published its [25 Year Environment Plan](#) (opens a new window) which sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

B1.4 The 25 Year Environment Plan embeds an ‘environmental net gain’ principle for development, including housing and infrastructure and promotes health and wellbeing through the natural environment. The Plan outlines how England will lead by example in tackling climate change and protecting and improving international biodiversity. One of the measures includes greening our towns and cities, creating more green infrastructure and planting more trees in urban areas with a commitment to plant one million trees by 2022.

B1.5 The Plan acknowledges that the value of natural capital is routinely understated and that in the past, our failure to understand the full value of the benefits offered by the environment and cultural heritage has seen us make poor choices. The value of green infrastructure is not captured by traditional accounting methods and is too often ignored in management and policy decisions. But when we use a natural capital approach, we are more likely to take better and more efficient decisions that can support environmental enhancement and help deliver benefits such as reduced long-term flood risk, increases in wildlife and improvements to human health and a boost to long-term prosperity.



APPENDIX C: Native Shrubs and Trees which are suitable in the North West:

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
Alnus Glutinosa	Alder	15m	160 years	90cm for first 20 years	Caterpillars, moths, birds, pollinators and mammals	✓	✓	✓		✓		Deciduous Catkins March to April Improves local soil fertility. Can be used to stabilise river banks, assist in flood control, to purify water in waterlogged soils Tolerates air pollution so good for highway verges
Betula Pendula	Silver Birch	15-20m	60-80 years	Up to 2.6m for first 20 years	Caterpillars, moths, birds, pollinators, mammals, fungi and wild flowers		✓	✓			✓	Deciduous Catkins April into winter Improves soil quality for other plants to grow
Betula Pubescens	Downy Birch	24m	60-80 years	Up to 2.6m for first 20 years	Caterpillars, moths, birds, pollinators, mammals and fungi		✓	✓		✓		Deciduous Catkins April into winter Improves soil quality for other plants to grow
Corylus Avellana	Hazel	8-10m	80 years or longer with coppicing	40-60cm for first 20 years	Caterpillars, moths, birds, pollinators, mammals and fungi			✓	✓		✓	Deciduous Flowers and catkins in February Produces edible nuts, Can also form a hedge
Crataegus Monogyna	Hawthorn	10m	250 years	40-60cm for first 20 years	Caterpillars, moths, birds,	✓	✓	✓	✓	✓	✓	Deciduous Flowers mid May Berries in Autumn

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
					pollinators and mammals							Can also form a hedge and is suitable for small gardens Avoid use around paths and playgrounds due to thorns
Acer Campestre	Field Maple	25m	350 years	40-60cm for first 20 years	Caterpillars, moths, birds, pollinators and mammals		✓	✓	✓	✓		Deciduous Flowers May to June
Ilex Aquifolium	Holly	10-20m	100-500 years	20cm for first 20 years	Birds, mammals, butterflies and pollinators		✓	✓	✓		✓	Evergreen Flowers in spring and berries throughout winter Can also form a hedge
Malus Sylvestris	Crab Apple	8-10m	100 years	20-40cm for first 20 years	Birds, mammals, caterpillars and pollinators			✓	✓		✓	Deciduous Flowers April to May Fruits ripen in Autumn and provide food for birds over winter
Populus Tremula	Aspen	25m	50-100 years	Up to 2m for first 20 years	Birds, mammals, moths and insects	✓	✓	✓	✓	✓		Deciduous Catkins in March
Prunus Avium	Wild Cherry	25m	60 years	50cm for first 20 years	Birds, mammals, butterflies and pollinators	✓		✓	✓		✓	Deciduous Flowers in April and berries in July Fallen leaves smell of marzipan Not suitable to be planted near buildings or utilities due to shallow invasive roots Suitable for larger gardens but not near

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
												paths due to fruit dropping
Prunus Padus	Bird Cherry	15m	300 years	40cm for first 20 years	Birds, mammals, butterflies and pollinators		✓	✓	✓	✓	✓	Deciduous Flowers in May and berries in late summer Can be grown as a shrub or a tree Suitable for smaller gardens but not near paths due to fruit dropping
Prunus Spinosa	Blackthorn	5-6m	100 years	40-60cm for first 20 years	Birds, mammals, butterflies and pollinators	✓	✓	✓	✓		✓	Deciduous Flowers in March and berries over winter which is valuable to birds Good in a native hedge
Quercus Petraea	Sessile Oak	30-40m	700 years +	50cm for first 20 years	Birds, mammals, butterflies, caterpillars, pollinators, bats, fungi and beetles	✓	✓	✓		✓	✓	Deciduous Oak trees support more wildlife than any other native trees. Flowers in spring and produce acorns after 20-30 years Slightly more hardy than an English Oak
Quercus Robur	Pedunculate/ English Oak	30-40m	1000 years +	50cm for first 20 years	Birds, mammals, butterflies, caterpillars, pollinators,	✓	✓	✓	✓	✓	✓	Deciduous Oak trees support more wildlife than any other native trees.

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
					bats, fungi and beetles							Flowers in spring and produce acorns after 20-30 years
Salix Caprea	Goat Willow	10-13m	300 years	20-40cm for first 20 years	Birds, caterpillars, butterflies, moths and pollinators	✓	✓	✓	✓	✓		Deciduous Most versatile of the willows and can be used in hedges. Will tolerate flooding Not suitable to be planted near buildings or drains due to shallow invasive roots Dislikes atmospheric pollution
Salix Cinerea	Grey Willow	10m	300 years	20-40cm for first 20 years	Birds, caterpillars, butterflies, moths and pollinators	✓	✓	✓	✓	✓		Deciduous Will tolerate flooding Not suitable to be planted near buildings or drains due to shallow invasive roots Dislikes atmospheric pollution
Salix Fragilis	Crack Willow	10-20m	300 years or 1000 years with pollarding	20-40cm for first 20 years	Birds, caterpillars, butterflies, moths and pollinators	✓	✓	✓		✓		Deciduous Will tolerate flooding Not suitable to be planted near buildings or drains due to shallow invasive roots Dislikes atmospheric pollution

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
Salix Viminalis	Osier Willow	6m		2m for first 20 years	Birds, caterpillars, butterflies, moths and pollinators			✓	✓	✓		Deciduous Good for making living willow structures. Will tolerate flooding Not suitable to be planted near buildings or drains due to shallow invasive roots Dislikes atmospheric pollution
Salix Alba	White Willow	10-30m	30 years		Birds, caterpillars, butterflies, moths and pollinators	✓	✓	✓	✓	✓		Deciduous Good for making living willow structures. Will tolerate flooding Not suitable to be planted near buildings or drains due to shallow invasive roots Dislikes atmospheric pollution
Sambucus Nigra	Elder	15m	60 years	40-60cm for first 20 years	Birds, caterpillars and pollinators	✓	✓	✓	✓		✓	Deciduous Flowers in June and berries in autumn Tolerant of poor soils, land contamination and drought
Sorbus Aucuparia	Rowan/Mountain Ash	18m	200 years	20-40 cm for first 20 years	Birds, caterpillars and pollinators	✓	✓	✓	✓		✓	Deciduous Flowers in May and berries in autumn
Ulmus Glabra	Wych Elm	40m	500 years	Slow growing	Birds, mammals and insects	✓		✓	✓		✓	Deciduous Flowers in spring and winged fruits in July

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
												Dislikes atmospheric pollution
Tilia Europaea	Common Lime	46m	500 years	30-60 cm for first 20 years	Birds, caterpillars and pollinators			✓	✓	✓	✓	Deciduous Flowers June to July and nectar is popular with bees
Tilia Platyphyllos	Large leaved Lime	40m	500 years	30-60 cm for first 20 years	Birds, caterpillars and pollinators			✓	✓	✓	✓	Deciduous Flowers June to July and nectar is popular with bees
Tilia Cordata	Small leaved Lime	40m	500 years	30-60 cm for first 20 years	Birds, caterpillars and pollinators			✓	✓	✓	✓	Deciduous Flowers June to July and nectar is popular with bees
Sorbus Aria	Whitebeam	10-25m	60-80 years		Caterpillars, moths, birds, pollinators	✓	✓	✓	✓	✓	✓	Deciduous Flowers in late spring and berries in autumn
Juniper Communis	Juniper	10m	150 years	5-30cm for the first 20 years	Caterpillars, moths, birds, pollinators	✓	✓	✓	✓		✓	Evergreen Can be grown as a shrub or a tree Flowers April to May Berries can take up to 2 years to ripen
Sambucus Nigra	Elderberry	15m	60 years		Caterpillars, moths, birds, pollinators and mammals	✓	✓	✓	✓	✓		Deciduous Flowers in April and May and berries in August to September

Native shrub/hedge/small tree species which are suitable in the North West:

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
Calluna Vulgaris	Heather	50-100cm			Birds, caterpillars, butterflies and pollinators	✓	✓				✓	Evergreen Flowers between July and September
Cytisus Scoparius	Broom	2.5m		20-40cm	Butterflies and moths	✓	✓				✓	Semi-evergreen. Very hardy in exposed coastal conditions, thrives in and improves nutritionally poor soils.
Lonicera Periclymenum	Honeysuckle	8m		Up to 90cm	Birds, butterflies and moths, mammals	✓	✓	✓	✓		✓	Deciduous Flowers June to September and berries in autumn.
Rosa Arvensis	Field Rose	4m		45cm	Birds, butterflies and moths, mammals	✓		✓	✓		✓	Deciduous Flowers in July and berries in autumn
Rosa Canina Agg.	Dog Rose	5m		40-60cm	Birds, butterflies and moths, mammals	✓		✓	✓		✓	Deciduous Flowers in June and berries in autumn
Ulex Europaeus	Gorse	3m	30 years	20-40cm	Birds, butterflies and moths, mammals		✓	✓			✓	Evergreen improves nutritionally poor soils.
Vaccinium Myrtillus	Bilberry	45cm			Pollinators		✓				✓	Deciduous Flowers May to July and berries August to September
Viburnum Opulus	Guelder-rose	8m		30-60cm	Birds, butterflies and moths and polinators	✓	✓	✓	✓	✓		Deciduous
Euonymus Euopaea	Spindle	9m	100 years		Birds, butterflies and moths and polinators		✓	✓	✓	✓		Deciduous Flowers May to June and berries October to December

Scientific name	Common name	Max height	Longevity	Growth per annum	Wildlife benefits	Coastal Areas	Soil			Hydrology		Notes
							Peat/Acid	Neutral	Alkaline	Damp	Dry	
Frangula Alnus	Alder Buckthorn	6m			Birds, butterflies and moths and pollinators		✓	✓		✓		Deciduous Flowers early summer and berries in autumn
Rhamnus Cathartica	Purging Buckthorn				Birds, butterflies and moths and pollinators		✓	✓		✓		Deciduous Flowers early summer and berries in autumn
Cornus Sanguinea	Dogwood	10m or in a hedge			Moths, insects, mammals and birds	✓	✓	✓	✓	✓	✓	Deciduous Found growing along woodland edges and in hedgerows. Ornamental garden plant for autumn colour.
Liqustrum Vulgare	Wild Privet	4.5m		40-60cm	Birds, moths, small mammals	✓		✓	✓		✓	Deciduous or semi-evergreen Flowers in July if uncut
Salix Repens	Creeping Willow	1.5m			Birds, caterpillars, butterflies, moths and pollinators	✓	✓	✓	✓	✓		Deciduous Good for ground cover
Buxus Sempervirens	Box	6m		15cm	Birds, caterpillars, butterflies, moths and pollinators			✓	✓		✓	Evergreen

*Fraxinus excelsior (Ash) is not included in the list above. Ash trees will be included once a solution to Ash dieback has been rolled out.

APPENDIX D: Biological Heritage Sites (BHSs)

D1.1 Blackpool has a number of Biological Heritage Sites:

- Salisbury Wood, Woodside Drive
- Robins Lane pond cluster, Bispham
- Field pond west of Bispham Road
- Bispham Marsh
- Queens Promenade coastal grassland – North Shore Boating Pool/Go Kart Track
- Carleton Cemetery pond cluster
- Holyoake reed bed, Warbreck
- Heron Way pond (Whitemoss)
- Stanley Park Island
- Broad Oak Lane field ponds
- Herons Reach Golf Course and Marton Mere habitat complex
- Blackpool South railway line – Squires Gate Station to Lytham Road Bridge
- Rough Heys, north of Yeadon Way - Now lost to development but one individual of the significant plant species still survives and is likely to continue to do so. (Planning permission was granted before designation)
- Field off Chapel Road

D1.2 There are two Biological Heritage Sites located in Wyre Authority close to the Blackpool Boundary. These are;

- Wood House Farm, Swamp and Adjacent Ponds, Poulton Le Fylde
- Garstang Road West Field Pond

D1.3 There are three Biological Heritage Sites located in Fylde Borough close to Blackpool Boundary. These are;

- Lytham Foreshore Dunes and Salt Marsh
- Smithy Farm Pond
- St Anne's Old Links Golf Course and Blackpool South Railway Line

D1.4 Four other sites are currently (January 2021) under consideration:

- Devonshire Road Rock Gardens - for butterfly populations
- Field Between Kipling Drive and Marton Mere LNR - for butterfly populations
- Land adjacent Cherry Tree Allotments - for water voles
- Lawsons Road Wetland - for great crested newts

APPENDIX E: Development that will require an Ecological Assessment or Species Survey

Proposals for Development that will require and Ecological Assessment or Species Survey	Extended Phase 1 Habitat	Bats	Barn Owl	Breeding Birds	Great Crested Newts	Otter	Dormouse	White Clawed Crayfish	Water Voles	Badger	Reptiles	Plants of Phase 2 Habitat
<p>Proposed development which includes the modification conversion, demolition or removal of buildings and structures (especially roof voids) involving the following:</p> <ul style="list-style-type: none"> • all agricultural buildings (<i>e.g.</i> farmhouses and barns) particularly of traditional brick or stone. • construction and/or with exposed wooden beams greater than 20cm thick. • all buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water. • pre-1960 detached buildings and structures within 200m of woodland and/or water. • pre-1914 buildings within 400m of woodland and/or water. • pre-1914 buildings with gable ends or slate roofs, regardless of location. • all tunnels, mines, kilns, ice-houses, adits, military fortifications, air raid shelters, cellars 		<p>✓ ✓ ✓ ✓ ✓ ✓ ✓</p>	<p>✓</p>	<p>✓</p>								

Proposals for Development that will require and Ecological Assessment or Species Survey	Extended Phase 1 Habitat	Bats	Barn Owl	Breeding Birds	Great Crested Newts	Otter	Dormouse	White Clawed Crayfish	Water Voles	Badger	Reptiles	Plants of Phase 2 Habitat
<p>and similar underground ducts, structures and caves.</p> <ul style="list-style-type: none"> all bridge structures, aqueducts and viaducts (especially over water and wet ground). 	✓	✓		✓		✓		✓	✓			
Proposals involving lighting of churches and listed buildings or flood lighting of green space within 50m of woodland, water, field hedgerows or lines of trees with obvious connectivity to woodland or water.		✓	✓	✓		✓						
Proposals affecting woodland, or field hedgerows and/or lines of trees with obvious connectivity to woodland or water bodies	✓	✓		✓			✓			✓		✓
Proposed tree work (felling or lopping) and/or development affecting old and veteran trees that are older than 100 years, trees with obvious holes, cracks or cavities or trees with a girth greater than 1m at chest height		✓		✓								
Proposals affecting gravel pits or quarries and natural cliff faces and rock outcrops with crevices, caves or swallets.		✓		✓							✓	✓

Proposals for Development that will require and Ecological Assessment or Species Survey	Extended Phase 1 Habitat	Bats	Barn Owl	Breeding Birds	Great Crested Newts	Otter	Dormouse	White Clawed Crayfish	Water Voles	Badger	Reptiles	Plants of Phase 2 Habitat
Major proposals within 500m of a pond or Minor proposals within 250m of pond (Note: A major proposal is one that is more than 10 dwellings or more than 0.5 hectare or for non-residential development is more than 1000m ² floor area or more than 1 hectare)	✓				✓							
Proposals affecting or within 30m of rivers, streams, canals, lakes, or other aquatic habitats.	✓			✓		✓		✓	✓			✓
Proposals affecting 'derelict' land (brownfield sites), allotments and railway land.	✓			✓						✓	✓	✓
Proposals affecting previously undeveloped (Greenfield) land with the exception of domestic gardens and in some cases intensively farmed arable land (see proposals affecting trees and hedges above)	✓			✓						✓	✓	✓
Proposed development affecting any buildings, structures, feature or locations where protected or priority species or habitats are known to be present (type of survey required decided on a case by case basis)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Proposals for Development that will require and Ecological Assessment or Species Survey	Extended Phase 1 Habitat	Bats	Barn Owl	Breeding Birds	Great Crested Newts	Otter	Dormouse	White Clawed Crayfish	Water Voles	Badger	Reptiles	Plants of Phase 2 Habitat
Proposed development on, adjacent to or otherwise affecting internationally, nationally or locally designated biodiversity or geodiversity sites (type of survey required decided on a case by case basis).	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Proposals affecting quarries, pits, cliffs, river sections, outcrops, mines, caves, tunnels, cuttings, and mine dumps.	Geological Survey and Assessment											
On the request of Blackpool Council or a Statutory Consultee.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

This page is intentionally left blank

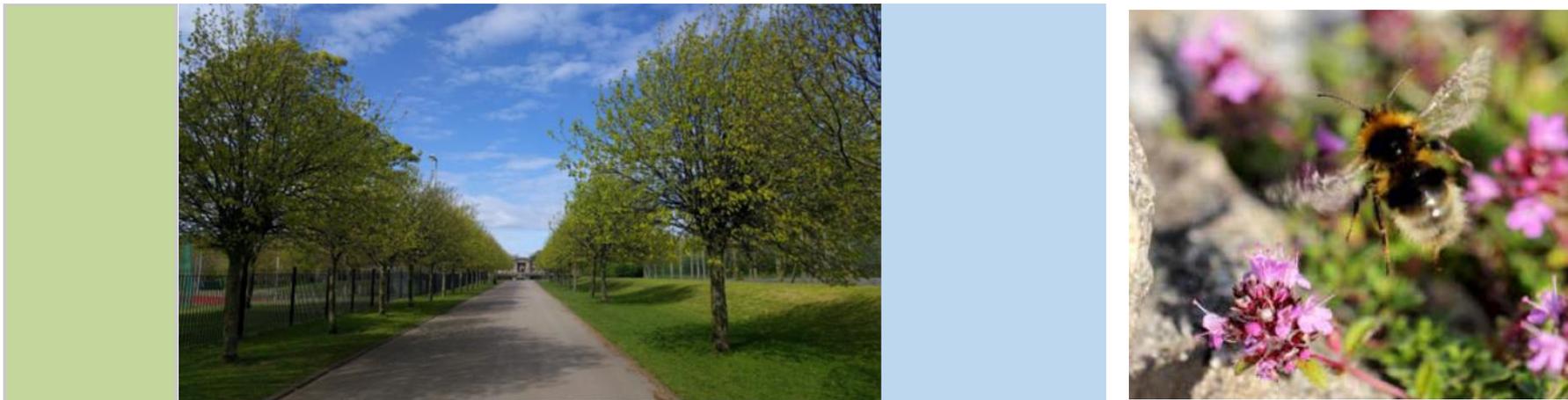
Greening Blackpool

Supplementary Planning Document

Consultation Statement

March 2022

Page 115



Contents

1.0 Introduction.....	4
2.0 Overview of the Consultation Responses	5

Appendices

Appendix A: Consultation Material.....	39
Appendix B: Specific (Statutory) and General Consultees notified	46

Tables

Table 1 - List of Respondents.....	5
Table 2 - Representations received during consultation September – October 2021.....	7

1.0 Introduction

- 1.1 This Consultation Statement relates to the Greening Blackpool Supplementary Planning Document (SPD) and has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 The Council carried out a six-week comprehensive consultation on the Greening Blackpool SPD Consultation Draft between 6th September and 18th October 2021.
- 1.3 The Consultation Draft of the Greening Blackpool SPD was made available in accordance with the Regulations and the Council's adopted [Statement of Community Involvement \(September 2020\)](#).
- 1.4 Blackpool Council provided the opportunity for any organisations/individuals (including statutory bodies, key stakeholders and members of the public) to submit representations on the Consultation Draft by:
- Publishing the Greening Blackpool SPD Consultation Draft and comments form on the Council's website (www.blackpool.gov.uk/greeningblackpool)
 - Notifying through letters and emails around 1200 bodies, groups and individuals who had registered onto the Council's consultation database (this includes specific and general consultation bodies as set out in the Regulations)
 - Publishing social media posts on Facebook, Twitter and LinkedIn throughout the consultation period
- 1.5 Appendices A and B provide evidence of the consultation undertaken for the Greening Blackpool SPD Consultation draft, including a list of statutory and general consultees notified, copies of the consultation materials and the Greening Blackpool SPD webpage.

2.0 Overview of the Consultation Responses

- 2.1 The Council received 14 responses to the Greening Blackpool SPD Consultation Draft from statutory (specific) consultees, general consultees, local authorities, agents and individual members of the public (refer Table 1).
- 2.2 Table 2 below lists those individuals/organisations that submitted responses to the consultation and provides the detail of their representations together with the Council's response. Some representations have resulted in the need to make minor modifications to the SPD text, which are also set out in Table 2.

Table 1: List of Respondents

1	National Highways
2	Historic England
3	Coal Authority
4	M Morell
5	J Bentley
6	United Utilities
7	Fylde Council
8	J Glaister
9	Sport England
10	J Mason
11	De Pol Associates
12	Environment Agency
13	Lichfields
14	Lancashire Wildlife Trust

2.3 With reference to the comments detailed in Table 2 below the aims and overarching principles of the SPD acknowledging the benefits of green infrastructure provision were generally supported, however the following broad issues were raised:

- Concern over the requirements for replacement trees not sufficiently taking account of land use efficiency and site constraints and that greater flexibility is required reflective of Policy DM21: Landscaping in the Blackpool Local Plan Part 2;
- Concern that the proposed replacement tree requirement of two semi mature trees to be planted in place for every tree lost was disproportionate particularly in relation to the replacement of Category C¹ trees;
- Lack of justification in the SPD on how the off-site planting contribution has been calculated;
- Concern over the level of financial contributions that are proposed for off-site provision of green infrastructure particularly the £1000 contribution per tree and the impact this may have on development viability;
- Concern over the open space requirements which were considered high; and that the proposed requirement should be more reflective of the site typologies and take into account existing open space close to proposed development.
- The SPD needs to better incorporate the requirements of the upcoming 2021 Environment Act, specifically the requirement for 10% Biodiversity Net Gain.

2.3 Some comments received did not directly relate to the Greening Blackpool SPD and included issues related to vandalism; sports facilities, playing pitch provision and surface water management. As appropriate these comments have been forwarded to the relevant Council Department for consideration.

¹ Category C - Trees of a low quality with an estimated remaining life expectancy of at least 10yrs, or young trees with a stem diameter below 150mm.

Table 2 - Representations received during consultation September – October 2021

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
001	National Highways	General Comment	There are no comments that National Highways needs to make on the draft SPD.	Comments Noted.
002	Historic England	General Comment	At this stage we have no comments to make on its content.	Comments Noted.
003	Coal Authority	General Comment	<p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Blackpool Council area lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	Comments Noted.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
004	M Morrell	General Comment	<p>A few years ago Devonshire Road was planted with saplings. Unfortunately some of these were vandalised. Would it be possible to have the spaces replanted with new trees? The noticeable areas are alongside the golf course towards Northgate Road.</p> <p>Also can you tell me what is happening with the planned park, where many trees were planted, on School road, Marton Moss. I still have the leaflet, nothing much seems to have happened. Walkways, bridle paths and refurbishing the farmhouse. Thank you for your attention,</p>	<p>This comment does not directly relate to the Greening Blackpool SPD. The comment has been forwarded to the appropriate Council Department, in this case the Parks and Green Environmental Services Team.</p>
005	J Bentley	General Comment	<p>I think it is a remarkably cynical exercise with very little merit. Blackpool has an SSSI... Marton Mere... and does nothing to promote it, spends nothing on it as a resource for locals and is dependent on the goodwill of volunteers to help maintain it. The green space around the hospital is sold and yet this document acknowledges the necessity of green space for mental health. Just who is making the money from this betrayal of the people of Blackpool?</p>	<p>This comment is not directly related to the contents of the SPD. However, it should be noted that the adopted Green and Blue Infrastructure Strategy recognises the importance Marton Mere SSSI. Blackpool's wildlife and countryside fringe is prioritised in this Strategy. Marton Mere is Blackpool's only Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) and acts as a centre for an ecological network connecting coast, countryside and urban areas. Further information can be found at: Blackpools Green and Blue Infrastructure Strategy 20192029 Accessible</p> <p>Any planning application that comes forward on the green space surrounding Blackpool Victoria Hospital will be considered against all the relevant planning policies including CS6: Green Infrastructure, DM21:</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
				Landscaping, DM35: Biodiversity and the Greening Blackpool SPD.
006	United Utilities	Surface Water Management and Drainage	United Utilities is really pleased to see that the document encourages multi-functional SuDS which will amongst other things reduce pressure on the drainage network and help address climate change concerns both now and into the future.	Support noted.
006	United Utilities	Surface Water Management and Drainage: Paragraph 4.37	<p>We note that paragraph 4.37 states</p> <p><i>‘Some areas of Blackpool suffer from flash flooding when heavy storms generate high volumes of surface water that can rapidly increase the flow in a combined sewer until the volume overwhelms the local drainage network’.</i></p> <p>In order to provide a further explanation of the challenges of the drainage network in the Blackpool area, we suggest the following as an alternative to the above:</p> <p><i>‘Blackpool has an integrated drainage network, which in most cases highway drains, watercourse’s and culverts connect into the public combined sewer system; and during periods of heavy rainfall can overwhelm the design capacity of the drainage network, due to its integrated nature. This further promotes the requirement for sustainable drainage across Blackpool.’</i></p>	<p>Comments noted. Paragraph 4.37 has been amended to read as follows :- “Some areas of Blackpool suffer from flash flooding when heavy storms generate high volumes of surface water that can rapidly increase the flow in a combined sewer until the volume overwhelms the local drainage network” <u>Blackpool has an integrated drainage network. In most cases highway drains, watercourse’s and culverts connect into the public combined sewer system and during periods of heavy rainfall can overwhelm the design capacity of the integrated drainage network. This further promotes the requirement for sustainable drainage across Blackpool.</u></p> <p>(Paragraph 4.37 has been renumbered to 4.38)</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			We have no further comments or suggested changes, and wish to express our support for the document.	
007	Fylde Council	General Comment	Fylde Council welcomes and supports this document which will help to improve the very urban environment of Blackpool.	Support noted.
007	Fylde Council	Environmental Issues: Paragraph 2.42	At Para 2.42 where it refers to ‘receiving waters’, it should state clearly that this is the marine environment i.e. bathing water and that these spills affect bathing water quality, otherwise it is unclear.	<p>Comment noted. Paragraph 2.42 has been amended to read as follows:</p> <p>...combined sewer overflows of Manchester Square and Anchorsholme Outfall pumping stations as a result. <u>Given that the waters around those outfalls are bathing waters,</u> there is a need to reduce the impact of these events in order to improve water quality standards in receiving <u>bathing</u> waters and to minimise the risk of serious damage to property and inconvenience to the public”.</p> <p>(Paragraph 2.42 has been renumbered to 2.43)</p>
007	Fylde Council	Environmental Issues: Paragraph 2.47	At para 2.47 <u>it</u> can have	<p>Comment noted. The text at paragraph 2.47 has been amended to correct this grammatical error.</p> <p>(Paragraph 2.47 has been renumbered to 2.48)</p>
007	Fylde Council	General Comment	There are some very relevant documents which contain planning policies that are applied in adjacent areas which should be reviewed/mentioned.	In producing the Greening Blackpool SPD we have taken into account relevant documents from Fylde Council and Wyre Council. There is nothing in this

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>The Fylde Local Plan to 2032 in particular Chapter 10: Health and Wellbeing and Chapter 13: Conserving and Enhancing the Natural, Historic and Built Environment.</p> <p>Also of relevance is the St Annes on the Sea Neighbourhood Plan, the policies of which apply to areas adjacent to the whole of the southern boundaries of Blackpool.</p> <p>The St Annes on the Sea Design Guides have been adopted as SPDs and can be found at this link Supplementary planning guidance (fylde.gov.uk)</p> <p>The Design Guide has a suggested Tree Palette. The Design Guide Companion Part 1 is a prospectus for the Enhancement of Corridors and Gateways the first one is Squires Gate Lane.</p> <p>The Companion Part 2 refers to the Airport and Squires Gate Lane.</p> <p>The Companion Part 3 refers to Squires Gate Station and the Airport.</p> <p>It would be worth reviewing these documents as the guidance within them applies to areas in Fylde that have very close connections with Blackpool.</p>	<p>SPD which will conflict with the aims or objectives of the policies or documents mentioned.</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			Finally, although there is a tree palette in the Design Guide, the Council adopted a Biodiversity SPD in 2019. That is also at the same link above.	
007	Fylde Council	Appendix C: Native Shrubs and Trees which are suitable in the North West	At Paragraph 7.83 it mentions choice of species in planted landscaping schemes. There is a list of species <u>not</u> to be planted in Lytham St Annes because they are invasive and they could spread to the dunes and become difficult to control? This list was taken from a similar SPD produced by Sefton who have a lot of expertise in Dune Management. It could be used to inform a list for Blackpool in areas near to the dunes.	Comments noted. The following species have been removed from Appendix C of the Greening Blackpool SPD to protect the Sand Dunes SSSI: <ul style="list-style-type: none"> • Black Poplar <i>Populus Nigra</i> • Grey Poplar <i>Populus Canescens</i> • Sea Buckthorn/Seaberry <i>Hippophae Rhamnoides</i>
007	Fylde Council	General Comment	Another relevant document is the Fylde Coastal Strategy Coastal-Strategy-2015-FINAL.pdf (fylde.gov.uk)	Comments noted. The Fylde Coastal Strategy (2015 - 2032) has been reviewed and it is in line with the thrust of the Greening Blackpool SPD and Blackpool's Green and Blue infrastructure Strategy. The Greening Blackpool SPD will assist both Fylde Council and Blackpool Council in meeting the aims of this document.
008	J Glaister	Sports Facilities Open Space Requirements: Paragraph 4.45	I have read the document and was disappointed there was no mention of the Athletics Facility at Stanley Park. Football pitch provision is covered in detail, but there is nothing about athletics.	The Greening Blackpool SPD provides guidance and direction on the importance for new development to fully consider landscaping and green infrastructure. The maintenance of existing sports facilities is not covered in this document.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>It is the only athletics facility on the Fylde Coast the nearest other one being at Cottam in Preston.</p> <p>I have visited the track for a few competitions this season including the Lancashire qualifier for English Schools and the Lancashire Championships.</p> <p>The track and associated field facilities are in a very poor state of repair. The track is very badly worn and patched, the run ups for Long Jump and Triple jump are very worn and slippery, which is very off putting for athletes especially when its wet. The toilets and the stand are also not good.</p> <p>Athletics Clubs are very inclusive, with a diverse range of events (field and track) to suit everyone, and anyone can join, children who show promise at school will be fast tracked through to the club for training, disabled people can also join in.</p> <p>The Council should identify the facility as an asset that needs investment. If it isn't improved it won't remain safe and fit for purpose. Competitions will be directed elsewhere and there will be nowhere for budding athletes to train. That would be a great loss to Blackpool, given the below average health of the population.</p>	<p>Regarding the athletics facilities at Stanley Park funding has been secured to replace the athletics track and smaller ancillary works. The main project is planned for the end of the athletics season in Autumn 2022. Work is currently ongoing with the local athletics club and England Athletics to develop a specification for the track replacement.</p> <p>Where the document refers to football pitch provision in Appendix A this is in the context of green infrastructure generally, detailing the supporting evidence and strategies informing the SPD.</p>
009	Sport England	Open Space Requirements: Paragraph 4.42 – 4.49	Open Space Requirements para 4.42 to 4.49.	Comments noted. The issue raised is not directly related to the Greening Blackpool SPD. The Playing Pitch Strategy (PPS) and Action Plan Update (April

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>It is noted local standards are proposed based on the Open Space Assessment 2019. However, local standards are not appropriate for sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from.</p> <p>Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not actively contribute to the supply of pitches and all too often become informal kickabout areas or semi-natural open space.</p> <p>Paragraph 98 of NPPF no longer requires local standards and Sport England are actively working with Blackpool via the Playing Pitch Strategy to prepare a more appropriate approach. It is this approach that should be included in the SPD.</p>	<p>2021) informs the spending of Section 106 contributions received from new development for new sports pitches. The PPS was produced in collaboration with Sport England and determines the requirement for playing pitches in Blackpool through application of the Sport England methodology. Blackpool is committed to having an up to date PPS and the next PPS update will commence in the summer of 2022 as agreed with Sport England.</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>It should be noted Sport England do not consider on-site provision of formal sports facilities to be sustainable unless they are supported by ancillary facilities and have a clear management and maintenance plan, and community use agreement. The Playing Pitch Strategy should help inform whether any contributions secured should be used to improve existing pitches or whether there is a need for new pitches.</p> <p>It should be noted Sport England do not object to standards for other open space typologies, only outdoor sport.</p>	
010	J Mason	Trees and Hedgerows: Paragraph 4.11	On page 30 section 4.11 it states that the netting of trees and hedgerows on development sites will be 'discouraged'. It would be better if netting could be specifically prohibited in the planning conditions when planning permission is granted.	Comments noted. Tree and hedgerow netting occurs in advance of a planning application being submitted outside of the bird nesting season. This prevents nesting birds returning to any given tree or hedgerow, minimising future disruption. Tree netting is not within the Council's control but is reliant on the bird nesting season.
010	J Mason	Trees and Hedgerows: Paragraph 4.5	I believe it is also necessary to clamp down in general on the removal of existing trees and hedgerows on land. If more people were subject to fines for doing this, it would help to act as a deterrent. I appreciate it is not easy to enforce, but I am aware of a number of areas close to where I live where trees have been removed prior to a planning application being submitted. In some of these cases I am also aware that the council have been made aware of this but have done nothing.	<p>Blackpool Council can only exercise control over the removal of trees, and any appropriate penalties, if the tree to be removed is in a conservation area or a Tree Protection Order (TPO) is in place.</p> <p>For development that requires planning permission, the Greening Blackpool SPD has a requirement for replacement tree planting to ensure that any trees lost are replaced. Furthermore, Core Strategy policy</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
				CS6: Green Infrastructure focuses on protecting existing green infrastructure networks. Emerging Local Plan Part 2 Policy DM21: Landscaping requires development to protect distinguishing landscape features, trees and hedgerows wherever possible.
010	J Mason	Landscaping	For new developments, residential and non-residential, once trees and landscaping have been put in place there needs to be safeguards put in place to make sure they cannot be reduced or removed at a later date. The document does not mention this. This would involve the freeholders/ leaseholders agreeing to maintain the green spaces. There should also be a planning condition that all newly planted trees are maintained until they are of an age/size where they no longer need any care. This would prevent trees needlessly dying because they have been planted in inappropriate places or have been killed by their supporting ties not being adjusted as the trunk grows. It would also stop residents/businesses taking down trees planted by developers.	Where a landscaping scheme is agreed as part of a planning application approval, a condition is applied to secure the future of the green infrastructure in place. Any trees or plants planted in accordance with this condition that are removed, uprooted, destroyed, die or become severely damaged or seriously diseased within 7 years of planting shall be replaced within the next planting season with trees or plants of similar size and species to those originally required unless otherwise first submitted to and agreed in writing by the Local Planning Authority.
010	J Mason	Environmental Issues: Paragraph 2.40	I would also like to see restrictions on the use of artificial grass and non-permeable driveways on residential as well as non-residential buildings.	Comments noted. This issue not directly related to the SPD. This SPD provides guidance on Green Infrastructure within new developments. Detailed guidance is available under policy DM31: Surface Water Management within the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies document.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
				Planning Officers in Development Management take flood risk and permeability into consideration when determining planning applications proposing landscaping schemes.
010	J Mason	Social Issues: Paragraph 2.35 Environmental Issues: Paragraph 2.46	Tree planting should be prioritised in high traffic areas in order to help reduce pollution from traffic fumes. Any new roads / road improvements should have to provide trees to offset the increased traffic.	Details on tree planting are provided in the Blackpool Tree Strategy (2021 – 2031). National Planning Policy Framework paragraph 131 states the importance of tree planting and requires that new roads should be tree-lined. It also states the importance of retaining existing trees where possible, which is reflected in this SPD.
011	De Pol Associates	Section 4 Tree Retention and Mitigation Planning Paragraph 4.0, 4.4, 4.5	<p>In section 4 the SPD requires the retention of all BS 5837 Category A, B or C trees and if removal is unavoidable it requires each felled tree to be replaced on a ratio of 2 trees for every tree lost. It requires the replacement trees to be semi-mature trees or in accordance with the Council’s Tree Strategy. The SPD definition of a semi-mature tree is one with an overall height in excess of 4 metres and/or a stem girth measurement (circumference) of 20 cm or larger when measured 1 metre above the ground.</p> <p>The requirement to retain trees where possible and to mitigate tree loss through replacement planting is not unreasonable in principle. However, whilst arboricultural impact assessments should inform site layout, trees are only one factor requiring consideration.</p>	The Blackpool Tree Strategy (2021-2031) requires that trees conforming to BS 5837 categories A, B and C are retained within development sites and that any trees lost are replaced on a ratio of 2:1. This is reflected in the Greening Blackpool SPD to ensure consistency with objective 3 of the Blackpool Tree Strategy. In addition, NPPF paragraph 131 further requires “that existing trees are retained wherever possible” and does not provide detail on the quality of trees lost. This is reflected in the SPD which permits the loss of trees where unavoidable, so long as replacement planting is provided and that losses are compensated for. Therefore the SPD is reflecting the requirements of both the Blackpool Tree strategy and the national framework where all trees lost within BS 5837 should be replaced irrespective of whether or not it falls under category C.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>There is a need to make efficient use of land and achieve appropriate densities under NPPF paragraph 124, which is particularly pertinent in Blackpool where there are limited development opportunities to meet the Borough's housing needs. Often sites have a range of site constraints which would make the retention of all existing trees unrealistic. It is more appropriate to identify the most important trees for retention and ensure that sufficient attention is given to these in the design and construction process to ensure that these can genuinely be retained in the long term. There should be more flexibility with regards to the loss of lower quality trees to enable an efficient layout, albeit with replacement planting provided within the scheme to mitigate tree loss.</p> <p>On this basis, to suggest that all Category A, B and C trees are to be retained unless 'unavoidable' is too restrictive, especially with regards to Category C trees. In this respect, BS 5837 defines Category C trees as being trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm. It refers to these being unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories. To suggest that layouts must avoid the loss of any Category C tree unless unavoidable is not considered reasonable or in the interests of other policy objectives.</p>	<p>The SPD is providing additional policy guidance to Core Strategy Policy CS6: Green Infrastructure which requires existing green infrastructure to be protected and enhanced. Within CS6 "the loss of green infrastructure will only be acceptable in exceptional circumstances" and that "provision is made for appropriate compensatory measures, mitigation or replacement; or in line with national planning policy".</p> <p>In striving for a more efficient use of land, existing trees will inform site layout and where site constraints require their removal any losses should be justified and compensated for.</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
011	De Pol Associates	<p>Development Requirements for Green Infrastructure in Blackpool: Paragraph 4.0</p> <p>Trees and Hedgerows: Paragraph 4.4</p>	<p>As worded the SPD fails to allow consideration to be given to all factors which influence site layout and as such could undermine other policy objectives such as making efficient use of land. In this respect the definition of 'unavoidable' is also unclear. There may be occasions where tree loss is clearly unavoidable such as when it is necessary to secure satisfactory access onto a site, but there may also be occasions where tree loss would be preferable to enable a more efficient and appropriate layout to be secured. It is unclear whether this would meet the definition of 'unavoidable'. Put simply, the SPD should not be worded in a manner which places unnecessary burdens on proposed development by unnecessarily requiring all trees, even Category C trees, to be retained in such circumstances.</p>	<p>In striving for a more efficient use of land existing trees will inform site layout and where site constraints require their unavoidable removal any losses should be compensated for with replacement planting. The SPD provides sufficient flexibility as trees can be removed so long as replacement planting is provided. For each development proposal a site assessment and tree survey will identify trees that can be retained and those which require unavoidable removal. Core strategy policy CS6 and NPPF paragraph 131 require all trees to be retained wherever possible irrespective of quality. This is further reflected in the Blackpool Tree strategy, requiring all BS5837 trees to be replaced on a 2:1 ratio in order to meet objective C of the tree strategy.</p>
011	De Pol	<p>Section 4</p> <p>Development Requirements for Green Infrastructure in Blackpool: Paragraph 4.0</p> <p>Trees and Hedgerows: Paragraph 4.5</p>	<p>With regards to replacement mitigation planting this should also be proportionate to the trees being lost. For example, Category C trees includes young trees with a stem diameter below 15cm and so it would be unreasonable the removal of such a tree to be replaced with two semi-mature trees in excess of 4 metres and/or a stem girth measurement of 20 cm or larger. This would be entirely disproportionate in terms of mitigating against the actual tree being lost. Consequently, rather than being so specific the SPD should be more flexible in terms of enabling individual cases to be considered on their merits.</p>	<p>Core Strategy policy CS6 and NPPF paragraph 131 require all trees to be retained wherever possible regardless of value or quality. This is proportionate compensation given the already low tree cover in Blackpool, and based on the Blackpool Tree Strategy (2021-2031) and the Green & Blue infrastructure strategy we feel this is appropriate. Replacement tree planting is to compensate for, not mitigate against, tree loss.</p> <p>The SPD provides sufficient flexibility in that trees can be removed where unavoidable but replacement planting must be provided to compensate for their loss. Tree loss will be assessed</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>It is therefore requested that the SPD be amended so that it clarifies that whilst layouts will be expected to make adequate provision for long-term retention of trees which are identified as having significant current or potential future amenity value as set out in BS 5837:2012, there will be flexibility with regards to the removal of trees, particularly category C trees, where this would enable more efficient use of land etc. Furthermore, where proposals do include the felling of existing category A, B or C trees the SPD should make it clear that landscape schemes will be required to make provision for sufficient replacement planting to compensate adequately for any resulting loss of amenity. However, rather than this being specified in the manner currently proposed, the SPD should include flexibility to enable the replacement tree planting to be proportionate to the functional / amenity value of the tree being lost.</p>	<p>on a case by case basis where it is the developer's responsibility to evidence trees that cannot be retained and to justify their removal. Where it is felt replacement tree planting cannot be achieved it requires justification in the planning application. The quality of trees lost does not preclude replacement planting.</p> <p>Tree loss impacts upon biodiversity where the requirement for two new trees to be planted for every tree lost is to compensate for the lead in period before they can provide suitable habitat. This reflects the requirements of the Blackpool Tree Strategy whereby trees conforming to BS 5837 categories A, B and C must be retained within development sites and that any trees lost are replaced on a ratio of 2:1.</p> <p>Whilst not currently mandatory, the Government's intention is to introduce the 10% biodiversity net gain requirement. This is also reflected in the NPPF and emerging policy, where through the current SPD wording it helps achieve biodiversity net gain in advance of the legislation being adopted.</p>
011	Del Pol Associates	Paragraph 4.0: Development Requirements for Green infrastructure in Blackpool.	In section 4 the SPD requires all new residential development (including change of use) providing more than 3 units to provide 2 trees for each dwelling in accordance with the Council's Tree Strategy.	The requirement for 2 trees to be planted on developments of 3 or more units is consistent with other Council policies. Land use efficiency and site layout will be influenced by the species of tree selected. The tree species to be provided is the

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
		Provision of trees: Paragraph 4.50	<p>Any tree, whether existing or proposed, will have an impact on the developable area of a site and its layout, by virtue of the root protection areas, the need to allow planted trees to reach their full mature height and spread without causing nuisance to adjacent structures and occupants and the need to plant trees sufficiently away from dwellings and other buildings to avoid overshadowing and potential structural harm etc. The requirement for development to provide 2 trees per dwelling on top of retaining all existing trees, together with the need for on-site public open space, above ground SuDS features and any other site and development constraints would therefore have significant implications on a site layout and ability to make efficient use of land.</p> <p>It is considered that the SPD is insufficiently flexible in terms of making allowance for the fact that a site may already have significant existing trees which are being retained or the implications of such a requirement on the ability to make efficient use of land when considering other policy requirements and on-site development constraints. There is also insufficient explanation or justification to demonstrate why 2 trees per dwelling is reasonable, appropriate, viable and realistically deliverable for sites in Blackpool when considered alongside other development plan requirements / obligations.</p>	responsibility of, and to be determined by, the developer in consultation with the Council's Parks and Green Environment Team to secure an efficient site layout.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
011	De Pol Associates	Landscaping: Paragraph 4.53, 4.54	<p>Planning Practice Guidance states in Paragraph: 008 Reference ID: 61-008-20190315 that supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They should also not add unnecessarily to the financial burdens on development.</p> <p>The parent Local Plan policy DM21 simply states that development should “wherever possible” enhance landscape features through increased tree cover and “where appropriate” contribute towards tree planting in the town. The SPD is therefore looking to essentially impose a new policy contrary to the PPG, as it replaces the flexible policy requirement for development to look to increase tree cover where possible, with a requirement for two trees to be planted for every dwelling proposed.</p>	<p>It is not considered that the SPD introduces new policy. The SPD amplifies the requirements of Core Strategy policy CS6: Green Infrastructure, Development Management policy DM21: Landscaping and the NPPF. It sets out how developers can meet planning obligations and policy requirements. If the full tree planting and landscaping requirements cannot be met then this must be detailed in an open book viability assessment.</p>
011	De Pol Associates	Provision of Trees: Paragraph 4.52	<p>Furthermore, the SPD will increase the financial burden on development. Para 9.5 of the Local Plan Viability Assessment 2019 provides a mixed picture on viability. The LPVA demonstrates that the surplus for elevated planning policy requirements and s106 contributions only exists where there is flexibility within Policy CS14: Affordable Housing. The LPVA identifies that delivery of 30% affordable housing, elevated policy requirements and s106 contributions is likely unviable. It also confirms</p>	<p>The Climate Change Emergency Declaration relates to Blackpool Council’s activities and decisions towards achieving net zero carbon emissions and 100% clean energy use by 2030. This is not prescriptive but is intended to provide best practice guidance for developers and to lead by example. It is a step towards achieving net zero carbon in planning decisions.</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			that the viability assessment made no allowance for the precise policy implications and potential additional costs of Blackpool's Climate Emergency Declaration as the implications of this were unknown. Consequently, the Local Plan LPVA did not make any allowance for the financial implications of having to plant 2 trees per dwelling.	The requirement for £1,000 per tree is only sought when tree planting cannot be provided on-site. The cost of £1000 incorporates the cost of providing the tree and securing maintenance. It is an average figure based upon the tree retention requirements of other councils and reflects the figure provided in the Blackpool Tree Strategy (2021 – 2031).
011	De Pol Associates	Trees and Hedgerows: Paragraph 4.7 Provision of Trees: Paragraph 4.52, 4.55	The LPVA suggests that viability is already challenging in the urban inner core and even for greenfield land in the urban edge market area it suggests that there would only be a surplus of between £1,350 to £4,500 per dwelling for planning obligations if a flexible approach to affordable housing is provided where 15% provision is delivered instead of the policy required 30%. The range depends upon whether it is a small, medium or large site. To put this into context, the SPD requires a financial contribution in lieu of on-site tree planting at a rate of £1,000 per tree. On this basis single dwellings would each need to provide a £2,000 contribution, which based on the LPVA would make smaller and medium greenfield sites unviable even based on the affordable housing requirement being halved.	The requirement for £1,000 per tree is only sought when tree planting cannot be provided on site. £1000 is a contribution towards the cost to the Council for providing the tree where the developer has been unable to plant trees on site. It incorporates the cost of supplying the tree and securing maintenance and is an average figure based upon the tree retention requirements of other councils. It reflects the figure provided in the Blackpool Tree Strategy (2021 – 2031).
011	De Pol Associates	Trees and Hedgerows: paragraph 4.7 Provision of Trees: Paragraph 4.55	Financial contribution in lieu of on-site planting Whilst the SPD allows for a financial contribution in lieu of on-site tree planting, this is identified at £1,000 per tree. There is insufficient justification for such a high cost and £500 per tree is considered to be a more realistic sum for any off-site contribution.	The requirement for £1,000 per tree is only sought when tree planting cannot be provided on site. £1,000 per tree is a contribution towards the cost to the Council for providing the tree where the developer has been unable to plant trees on site. It

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
				incorporates the cost of supplying the tree and securing maintenance and is an average figure based upon the tree retention requirements of other councils. It reflects the figure provided in the Blackpool Tree Strategy (2021 – 2031).
011	De Pol Associates	Open Space Requirements: Paragraph 4.43, 4.48, Table 2: Open space cost per person	<p>The SPD requires all new residential development (including change of use) providing 3 or more units to provide 40 sqm of open space per person based on average occupancy rates. Table 1 of the SPD provides average occupancy rates for houses based on the number of bedrooms, with the average open space requirement per dwelling being 82 sq. meters. This is a significant open space requirement for new development to accommodate whilst trying to make efficient use of land.</p> <p>Furthermore, it is evident from the Open Space Technical Report that this 40 sqm comprises open space typologies which would not ordinarily be provided on a residential development, such as parks & gardens, outdoor sports facilities and allotments. The open space typologies applicable to residential schemes are natural and semi-natural greenspace, amenity greenspace and provision for children / young people, which combined total 1.5ha per 1,000 population or 15 sqm per person.</p>	The Public Open Space requirement was set based on the recommendations of the Blackpool Public Open Space Assessment Technical Report (November 2019). This was produced by qualified external consultants at The Environment Partnership and sets the requirement of 4 hectares per 1000 population in paragraph 7.16, equating to 40m ² per person.
011	De Pol Associates	Open Space Requirements: Paragraph 4.43, 4.48	The SPD also fails to take into account the fact that some development sites in the Borough are already located within easy accessibility to existing parks and outdoor	40m ² open space per person is the minimum open space requirement informed by the the Blackpool Open Space Assessment Technical Report

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
		Table 2: Open space cost per person	sports facilities etc. All proposed developments should therefore be assessed individually to establish their open space needs and if it can be demonstrated that existing provision in the vicinity already equals or exceeds the minimum requirement in terms of the quantity and quality of facilities then this should be taken into account when considering the amount of open space to be required on new development.	(November 2019). It is considered that the open space to be provided on new development cannot be based on proximity to existing open spaces as new developments place greater pressure on existing open space provision. This in turn would reduce the average open space available per person to an amount below 40m ² .
011	De Pol Associates	Open Space Requirements	<p>As already highlighted, the Local Plan Viability Assessment already identifies significant viability constraints in Blackpool and this was based at time when the on-site open space requirement was significantly lower than what is now being suggested in this SPD.</p> <p>It is therefore considered that the SPD should reduce the amount of open space required per person and also allow other factors to be taken into account such as accessibility to existing open space provision.</p>	The Blackpool Local Plan Part 2 Viability Assessment accounted for the open space requirement set out in this SPD and reflects the need to provide 40m ² open space per person as informed by the Blackpool Open Space Assessment Technical Report (November 2019).
011	De Pol Associates	Open Space Requirements: Paragraph 4.45, 4.49, Table 1: Open space requirements informed by 2011 Census average household occupancy	If the full provision of open space cannot be provided on-site the SPD suggests that a financial contribution towards up-grading open space off-site will be required. It suggests £985.20 per 40 sqm. Bearing in mind the suggested occupancy for 4 bed properties is 2.9 people, this equates to almost £3,000 per dwelling. It is considered that insufficient evidence has been provided to demonstrate that this sort of contribution is proportionate, justified and viable when considering all	The figure of £985.20 is derived from Supplementary Planning Guidance 11 and has been increased in line with inflation. This figure was developed with the Parks and Green Environmental Services team and is the assessed need. If the developer determines this figure is unviable a viability assessment will be required to evidence this.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
		Table 2: Open space cost per person Table 3: Cost of open space per dwelling size	other obligations and requirements imposed by planning policy. As already highlighted, this based on the LPVA this would make smaller and medium greenfield sites unviable even based on the affordable housing requirement being halved.	
011	De Pol Associates	Green Roofs and Walls: Paragraph 2.51, 4.2, 4.53	The SPD suggests that where sites are constrained by a lack of space to provide traditional landscaping, green infrastructure can be provided through green roofs and walls and other innovative approaches, which do not affect the amount of land available for development (para 4.2). Whilst such an approach may not affect the developable footprint it can have a significant impact on viability, nor is it necessarily appropriate for many sites especially traditional residential schemes. The SPD should not imply that this is a solution that all sites must consider.	<p>Comments noted. Additional text has been added to the SPD to read as follows:</p> <p>Paragraph 2.51: “...installing or retro-fitting green roofs, walls and facades should take place where appropriate and viable. It in Blackpool would greatly support biodiversity in Blackpool and contribute towards a network of green corridors around the town”.</p> <p>Paragraph 4.2: “...green infrastructure can be provided through green roofs and walls where appropriate and viable and through other innovative approaches which do not affect the amount of land available for development”.</p> <p>Paragraph 4.53: “All non-residential new build commercial and leisure development should provide onsite green infrastructure where possible. Where a site is tightly constrained with lack of space for more traditional landscaping, consideration should be given to the use of green roofs and walls where appropriate and viable”.</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
				Paragraph 2.51 has been renumbered to 2.52, and 4.53 to 4.56.
011	De Pol Associates	Surface Level Car Parking: Paragraph 4.54	There is a reference to surface level car parking areas having permeable surfaces and to be well screened and landscaped with green infrastructure. It is assumed that the SPD is referring to car parking courts and it is requested that more clarity is provided in this regard. It would be unrealistic to expect all residential driveway parking to individual dwellings to be well screened and landscaped. Permeable surfaces are also not always appropriate for the ground conditions or preferred surface water strategy.	Paragraph 4.54 relates to surface level car parking associated with new build commercial and leisure development as per the header above paragraph 4.53. If permeable surfaces are not appropriate or cannot be provided this must be justified in an indicative drainage strategy submitted as part of an application, which will be considered in the decision making process.
012	Environment Agency	General Comment	In general, we are supportive of the SPD and its objectives for Blackpool and the environment. Protecting and enhancing green and blue infrastructure (GBI) will contribute to providing climate change adaptation and mitigation, facilitating opportunities for biodiversity net gain, managing flood risk, improving water quality, which would benefit people and wildlife. We would be keen to explore with the LPA what opportunities may exist for habitat creation and environmental schemes within the Blackpool area which would help to deliver these benefits.	Support noted.
012	Environment Agency	Trees: Paragraph 2.7	<u>Trees (pg. 13)</u> In addition to the benefits already listed, planting trees alongside watercourses, where appropriate (see comment regarding consents for activities affecting	Comments noted. This text that details the benefits of tree planting alongside watercourses and has been inserted into the SPD under paragraph 2.8. This reads as follows: <u>"In addition to the benefits</u>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			watercourses), can provide shade and help to keep watercourses cool. In prolonged hot weather oxygen levels in rivers can fall which can lead to the death of aquatic species, especially fish.	<u>already listed, planting trees alongside watercourses, where appropriate, can provide shade and help keep watercourses cool. In prolonged hot weather oxygen levels can fall which can lead to the death of aquatic species, especially fish”.</u>
012	Environment Agency	Duty to Co-Operate and Cross Boundary Green Infrastructure: Paragraphs 3.16 – 3.20	<u>Cross-boundary issues (pg.25)</u> In regard to cross-boundary issues and linking GBI and biodiversity networks with neighbouring districts (Fylde, Wyre and beyond), we would encourage the LPA to explore working at the catchment scale to gain an understanding what opportunities may exist for environmental and biodiversity improvements. This is something that we would be keen to be involved with.	Comments noted. The duty to cooperate and cross boundary working with Fylde and Wyre are acknowledged in the document. Refer to section ‘Duty to Cooperate and Cross Boundary Green Infrastructure’. Refer also to the Green and blue infrastructure strategy (Appendix A) and MOU on pages 25 and 41 of this SPD.
012	Environment Agency	Biodiversity Requirements: Paragraphs 4.12 – 4.20	<u>Biodiversity requirements (pg. 30)</u> The emerging requirements for biodiversity net gain mean that developments will need to improve and enhance the environment through a minimum 10% biodiversity net gain (BNG), which will be mandated in the Environment Bill, in conjunction with the use of a consistent metric (Biodiversity Metric). We would therefore encourage the LPA to integrate this approach into the SPD and consider a more ambitious BNG of greater than 10%. The new Biodiversity Metric 3.0 was launched in July and is the approved way of measuring BNG. In addition, to	Comments noted. The Council considers it important to adopt the Greening Blackpool SPD in advance of biodiversity net gain becoming a mandatory requirement, however a figure greater than 10% net gain will be considered as part of the Core Strategy Review which commenced in 2021. Any requirements introduced through legislation will be reflected in the Review.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>the Biodiversity Metric, the following products have been developed:</p> <ul style="list-style-type: none"> • Small Sites Metric - A beta version of the metric that has been developed for use on small sites. • Environmental Benefits from Nature Tool - A beta version of the Environmental Benefits from Nature Tool (formerly known as the Eco-metric), a voluntary tool that can be used in conjunction with the Biodiversity Metric 3.0 to expand net gain approaches to include wider natural capital benefits such as flood protection, recreation and improved water and air quality. <p>All three of the above products can be used to tackle the crises of climate change and biodiversity loss, as such we recommend that the SPD references them where appropriate.</p> <p>Although the SPD mentions the national Nature Recovery Network (NRN), the requirement for Local Nature Recovery Strategies (LNRS), as proposed in the Environment Bill, have not been mentioned. LNRS will provide a possible mechanism for the future management and maintenance of Local Nature Conservation sites.</p>	
012	Environment Agency	Protected Species: Paragraphs 4.21 – 4.25	<p><u>Protected species (pg. 31)</u> We would suggest that the SPD should seek habitat creation and enhancement for protected species,</p>	Comments noted. Details on habitat creation have been added under paragraph 4.25 of this SPD to read as follows:

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			particularly those of the aquatic environment, in appropriate locations.	<u>“New development should look for opportunities to provide habitat for protected species including newts, bats and butterflies”.</u>
012	Environment Agency	Pre Application Advice	<p><u>Pre Application Advice (pg. 37)</u> We would recommend including the following text is included: <i>Developers should have regard to the latest Planning Practice Guidance on how biodiversity net gain can be achieved as part of the proposed development</i> https://www.gov.uk/guidance/naturalenvironment.</p> <p>Developers can also be sign-posted to the following guidance: New guidance issued for Biodiversity Net Gain (ciria.org)</p>	<p>Comments noted. The text has been added to the SPD to read as follows:</p> <p><u>“Developers should have regard to the latest Planning Practice Guidance on how biodiversity net gain can be achieved as part of the proposed development: https://www.gov.uk/guidance/naturalenvironment.”</u></p> <p><u>Further guidance on Biodiversity Net Gain is available at the following link: New guidance issued for Biodiversity Net Gain (ciria.org)”</u></p>
012	Environment Agency	Green Infrastructure: Paragraph 2.7	<p><u>Aquatic Environment</u> We consider that the SPD should include a greater emphasis on the aquatic environment and the benefits of enhancing and creating new features and habitats. We would encourage the LPA to include an objective which seeks the creation and improvement of watercourses, wetlands and other waterbodies as part of Blackpool’s GBI. This would contribute to BNG provision along with climate change adaptation and mitigation, flood risk management, water quality improvements and public health and community benefits.</p>	<p>Comments noted. The benefits of tree planting alongside watercourses has been added to the SPD under paragraph 2.8 to read as follows:</p> <p><u>“In addition to the benefits already listed, planting trees alongside watercourses, where appropriate, can provide shade and help keep watercourses cool. In prolonged hot weather oxygen levels can fall which can lead to the death of aquatic species, especially fish”.</u></p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
012	Environment Agency	Surface Water Management and Drainage: Paragraph 4.39	<p><u>De-culverting watercourses</u></p> <p>We would suggest that the SPD mentions that, where they exist, opportunities to deculvert watercourses should be sought. The restoration of river corridors by removing or opening sections of existing culverting and restoring natural river beds and banks can have wider benefits, including:</p> <ul style="list-style-type: none"> • providing habitat for wildlife and improving its connectivity; • providing additional flood storage capacity and slowing flows; • ameliorating the urban heat island effect; • providing areas for recreational use; • improving amenity, health and educational opportunities; • increasing property prices and their desirability; • reducing maintenance costs and improving safety. • 	<p>Comments noted. Paragraph 4.39 has been amended to read as follows:</p> <p><u>“...incorporate SuDS as green infrastructure. Where opportunities exist the Council expects watercourses to be de-culverted where appropriate”.</u></p> <p>Paragraph 4.39 has been renumbered to 4.41.</p>
012	Environment Agency	Surface Water Management and Drainage: Paragraph 4.38, 4.39	<p><u>Activities near / affecting watercourses</u> Flood risk activities and works (including tree planting) within 8 metres of the top of the banks of a designated main river watercourse (16 metres if it involves quarrying or excavation or if it is a tidal main river) would require a permit from the Environment Agency. Main rivers can be identified on the Environment Agency’s ‘Main River Map’.</p>	<p>Comments noted. This requirement has been incorporated into the SPD at paragraph 4.42 to read as follows:</p> <p><u>“Flood risk activities and works (including tree planting) within 8 metres of the top of the banks of a designated main river watercourse (16 metres if it involves quarrying or excavation or if it is a tidal main river) require a permit from the Environment</u></p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			Works affecting ordinary watercourses (non-main rivers) require the prior consent of the Lead Local Flood Authority. As such, we would suggest that the SPD includes text to highlight the requirement for consent for activities affecting and within specific proximities of watercourses.	<u>Agency. Main rivers can be identified on the Environment Agency's 'Main River Map'. Works affecting ordinary watercourses (non-main rivers) require the prior consent of the Lead Local Flood Authority</u> ".
012	Environment Agency	Surface Water Management and Drainage Paragraph 4.38, 4.39	<u>Water Resources</u> The impacts of climate change are also likely to increase the likelihood of drought conditions (due to drier, hotter summers), as such the SPD should seek to facilitate GBI features that would help with water retention and groundwater recharge.	Comments noted. This has been addressed in paragraph 4.40 of the SPD to read as follows: <u>"Green Infrastructure and SuDS can also assist with water retention and groundwater recharge which will become increasingly important given the greater likelihood of drought conditions from climate change, featuring hotter, drier summers"</u> .
013	Lichfields	Development Requirements for Green Infrastructure in Blackpool Council: Paragraph 4.0 Provision of Trees: Paragraph 4.55	Bourne Leisure acknowledges the importance of Green Infrastructure and considers that the general approach and design guidance advocated by the SPD aligns with its own desire to ensure that its Parks are surrounded by and include Green Infrastructure. On this basis Bourne Leisure does not wish to object the overarching principles or guidance set out within the SPD.	Support noted.
013	Lichfields	4.0 Development Requirements for Green Infrastructure in Blackpool Council	Bourne Leisure does, however, have some comments and points for clarification regarding some of the specific requirements set out within the SPD.	Comments noted. For the purposes of clarity references to leisure development have been amended to 'non-residential development' in the summary of key requirements box to read as follows:

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
		Summary of Key Requirements Box	<p>In particular, one of the key requirements set out in page 27 is that:</p> <p><i>“All new commercial and leisure development (including change of use) will be required to provide one tree for each 100 m² of floor space. If the full provision of tree planting cannot be provided on site, a financial contribution towards tree planting off site will be required...”</i></p> <p>It is noted that commercial and leisure development is not defined within the SPD, nor within the Development Plan. Whilst neither touring and static caravans comprise “Development” for the purpose of the Town & Country Planning Act 1990 (as amended) and do not constitute floorspace, “commercial and leisure development”, this should be confirmed within the SPD for the avoidance of doubt. This does not negate the principles of providing trees as Green Infrastructure on site, but this should be considered on a site by site basis.</p>	<p><u>“All new non-residential development commercial and leisure (including change of use) will be required to provide 1 tree for each 100 square metres of floorspace”.</u></p>
013	Lichfields	Tree Planting: Paragraph 4.7, 4.52	<p>Paragraph 4.55 confirms that financial costs towards off-site tree planting would be sought by a sum of £1,000 per tree. Paragraph 4.7 confirms that where replacement tree planting cannot be secured on site, the same off-site contribution of £1000 per tree will be sought. It is unclear how this cost has been calculated, and it is suggested that clarification is provided and consulted upon given the extensive costs that could be</p>	<p>The requirement for off-site tree planting is only sought when tree planting cannot be provided on site.</p> <p>£1000 per tree is a contribution towards the cost to the Council for providing the tree where the developer has been unable to plant trees on site. It incorporates the cost of supplying the tree and</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p>incurred in the event that off-site delivery is required. It is important to ensure that projects remain feasible in order to deliver wider objectives of the Development Plan.</p>	<p>securing maintenance and is an average figure based upon the tree retention requirements of other councils. It reflects the figure provided in the Blackpool Tree Strategy (2021 – 2031).</p> <p>This SPD is reiterating the requirements of local policy and the national framework and is in line with local and national policy requirements. It supplements Core Strategy Policy CS6: Green Infrastructure that requires existing green infrastructure to be protected and enhanced.</p> <p>Within CS6 “the loss of green infrastructure will only be acceptable in exceptional circumstances” and that “provision is made for appropriate compensatory measures, mitigation or replacement; or in line with national planning policy”.</p> <p>NPPF paragraph 131 further requires “that existing trees are retained wherever possible” and does not provide detail on the quality of replacement planting. This SPD permits the loss of trees where unavoidable, so long as replacement planting is provided and that losses are compensated for.</p>
013	Lichfields	Development Requirements for Green Infrastructure in Blackpool: Paragraph 4.0	<p>Another key requirement set out on page 27 is that:</p> <p><i>“All BS 5837 Category A, B or C trees should be retained on a development site. If removal of BS 5837 category A, B or C tree is unavoidable, each felled tree is to be</i></p>	<p>NPPF paragraph 131 requires “that existing trees are retained wherever possible” and does not provide detail on the quality of trees requiring replacement planting. This is reflected in the SPD which permits the loss of trees where unavoidable, so long as</p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			<p><i>replaced by two semi-mature trees or in accordance with the Council's Tree Strategy"</i></p> <p>It is considered that this requirement as currently worded is onerous, as it takes a disproportionate approach to the replacement and loss of Category C trees. Category C trees are by definition trees of a low quality, typically having a low life expectancy and contributing very little the amenity of the locality. Bourne Leisure suggests that Category C trees should not be considered as a constraint against development and that their removal is generally acceptable. On this basis, the category C trees should be removed entirely from this requirement which would ensure a proportionate and reasonable approach in line with national policy and accepted best practice. The suggested change does not prevent or deter the inclusion of Green Infrastructure within future proposals, but it does ensure a proportionate and pragmatic policy position.</p>	<p>replacement planting is provided and that losses are compensated for.</p> <p>Therefore the SPD is reflecting the requirements of the national framework and additionally those of Core Strategy Policy CS6: Green Infrastructure which requires existing green infrastructure to be protected and enhanced.</p> <p>The Blackpool Tree Strategy (2021-2031) further requires that trees conforming to BS 5837 categories A, B and C are retained within development sites and that any trees lost are replaced on a ratio of 2:1. This is reflected in the Greening Blackpool SPD to conform to objective 3 of the Blackpool Tree Strategy. Tree loss is assessed on a case by case basis and where it is felt replacement tree planting cannot be provided it requires justification in the planning application and subsequent compensation. The quality of trees lost does not preclude replacement planting. It is the developer's responsibility to evidence trees that cannot be retained and to justify their removal.</p>
013	Lichfields	Section 4 Development Requirements for Green Infrastructure in Blackpool Council	Another key requirement of the SPD, set out on page 27, is that <i>"All development proposals will be required to demonstrate a net gain in biodiversity"</i> . The additional clause, <i>"where appropriate"</i> , should be included at the end of this sentence to ensure that this policy requirement is reasoned and takes into account matters such as feasibility, which is particularly important for	<p>Comments noted. The following text has been added to the summary of key requirements box to read as follows:</p> <p><u>"All development proposals will be required to demonstrate a net gain in biodiversity in accordance with policy DM35: Biodiversity. DM35</u></p>

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			constrained sites. On page 36 the SPD allows flexibility for replacement trees to be planted within 500m of the development site or on main routes between the development site and the Town Centre or within the Town Centre itself. Bourne Leisure endorses this flexibility.	<u>requires biodiversity enhancements and habitat creation where opportunities exist”.</u>
013	Lichfields	General Comment	<u>Summary</u> Bourne Leisure welcomes the consultation on the Greening Blackpool SPD but considers there are a small number of changes needed to ensure that the document is effective and not unduly onerous. We trust that this consultation response will be taken into account and used for further development of the SPD.	Comment noted.
014	Lancashire Wildlife Trust	Duty to Co-Operate and Cross boundary Green Infrastructure: Paragraph 3.18, 3.19 Paragraph 4.14	Paragraph 3.18-3.19. Really pleased to see cross-boundary issues/working recognised as the administrative boundaries mean nothing to wildlife and co-operation will be critical when developing nature recovery networks etc. (para 4.14).	Support noted.
014	Lancashire Wildlife Trust	4.0 Tree health	Pleased to see this key issue recognised in the light of Blackpool's aspirations to dramatically increase % tree cover	Support noted
014	Lancashire Wildlife Trust	Appendix C: Native Shrubs and Trees which are suitable in the North West	Whilst Ash (<i>Fraxinus excelsior</i>) is a native tree, it would be extremely unwise to plant it whilst ash dieback disease (<i>Hymenoscyphus fraxineus</i>) remains so prevalent and with no effective treatment as yet. You will also	Comment noted. <i>Fraxinus excelsior</i> (Ash) has been removed from the list in Appendix C on page 50. Ash trees will be included once a solution to Ash dieback has been rolled out. A footnote has now been included in Appendix C to explain this.

No.	Name/Company	Type / Paragraph number /section	Comments	Blackpool Council Response
			need to plan for the likely loss of Blackpool's existing ash tree component.	
014	Lancashire Wildlife Trust	Sites of Special Scientific Interest (SSSI): Paragraph 4.26 – 4.30	Paragraph 4.30. Starr Hills Sand Dunes - Just to make you aware that Unit 1 of this site is owned by Blackpool Council, although located within Fylde. This was the location of the 2021 sand lizard release (Protected Species). S106 agreements from nearby developments contribute to the management of this SSSI & Fylde Council's Ranger Service.	Comment noted.
014	Lancashire Wildlife Trust	Biological Heritage Sites: Paragraph 4.31	The BHS system is set to receive new funding which will allow for the re-survey of sites & other actions.	Comment noted.
014	Lancashire Wildlife Trust	Appendix C: Native Shrubs and Trees which are suitable in the North West	Appendix C, page 54, Black Poplar (<i>Populus nigra</i>) - This native tree species is extremely rare. If it is planted, please keep careful records of its location so as not to complicate its natural distribution.	Comment noted. Black Poplar (<i>Populus nigra</i>) has been removed from Appendix C: 'Native Shrubs and Trees which are suitable in the North West'
014	Lancashire Wildlife Trust	Appendix C: Native Shrubs and Trees which are suitable in the North West	Appendix C, page 55, Sea Buckthorn (<i>Hippophae rhamnoides</i>) - Please just DO NOT plant it on the west coast, where it is classed as an Invasive Non-Native Species (INNS) and causes huge management problems/costs on coastal sites. The Fylde Sand Dunes Project (www.lancswt.org.uk/our-work/projects/fylde-sand-dunes) and Dynamic Dunescapes at Fleetwood can both tell you what a management nightmare it is.	Comments noted. Sea Buckthorn has been removed from Appendix C: 'Native Shrubs and Trees which are suitable in the North West'
014	Lancashire Wildlife Trust	S106 and S278 agreements and the use of conditions: Paragraph 5.5, 5.6	5.5-5.6 Section 106 agreements - Again, based on past experience, these can be valuable means of resourcing the management of key wildlife sites.	Support noted.

Appendix A: Consultation Material

Figure 1: Social media notices



Blackpool Council
8,361 followers
4d • 🌐

🌱 Our Greening Blackpool consultation is currently underway, and we need you to join in the conversation.

Help us fight climate change by having your say on our Supplementary Planning Document, which states the importance for new developments to consider green space and landscaping.

This includes open space, sports and play facilities, amenity greenspace, public art, biodiversity and trees.

Learn more and share your views → <https://lnkd.in/eWpWPx-f>



👍 6

👍 Like 💬 Comment ↪ Share ↗ Send

Be the first to comment on this

Figure 2: Webpage

The screenshot shows the Blackpool Council website. At the top, there is a dark green navigation bar with links for Accessibility, Sitemap, Contact us, A to Z, and Keep updated. A 'listen' button is on the right. Below this is a purple header with the Blackpool Council logo and navigation links for Residents, Business, The council, and Visitors. A search bar is also present. The main content area has a breadcrumb trail: Home > Residents > Planning environment and community > Planning > Planning policy > Greening Blackpool. To the left of the main title is an icon of a house with dimensions. The main title is 'Greening Blackpool' in purple, with a sub-header 'Last Modified September 09, 2021' and icons for social media and printing. The page content includes a section for 'Current Consultation' with a paragraph about the consultation period (6 September 2021 to 18 October 2021, 5:00pm). Below this is a 'Background' section with two paragraphs. The first paragraph defines green infrastructure as a network of multifunctional green space. The second paragraph discusses a shortage of green infrastructure in the Inner Area and Town Centre. A third paragraph states that the Greening Blackpool SPD provides direction on the importance of fully considering landscaping and green infrastructure in new development. At the bottom, there are two links: 'Greening Blackpool SPD Consultation Draft (September 2021). [PDF 0.85MB]' and 'Comments Form [PDF 0.35MB]'. A 'Back to top' link is at the bottom right.

Figure 3: Comments Form

Draft Greening Blackpool SPD
Comments Form –September 2021



Draft Greening Blackpool SPD – Consultation Comments Form

**Deadline for submitting comments:
5pm on Monday 18th October 2021**

Please submit your comments form in one of the following ways:

- by email to: planning.strategy@blackpool.gov.uk
- by post to: Planning Strategy, Blackpool Council, PO Box 17, Corporation Street, Blackpool FY1 1LZ

****Please note that your name/organisation and representation/s will be made publicly available**

Contact Information

You must provide a contact name and address.

	Person/Organisation	Agent (if applicable)
Title		
First Name		
Last Name		
Job Title		
Organisation		
Address		
Postcode		
Telephone		
Email		

1

Draft Greening Blackpool SPD
Comments Form –September 2021

General Data Protection Regulations (GDPR)
The data controller for any such personal data you may give us Blackpool Council. The Council's Data Protection Officer can be contacted at dataprotectionofficer@blackpool.gov.uk. We will be processing such personal data in the following ways, depending on the data you provide to us:

- Your personal data will be kept on file by us for the duration of the Greening Blackpool SPD preparation and used to provide further updates in relation to consultations on the Greening Blackpool SPD
- We will not pass your details on to any third party
- You may request to be removed from our lists at any time by emailing planning.strategy@blackpool.gov.uk or writing to the Planning Strategy Team, Blackpool Council, PO Box 17, Corporation Street, Blackpool, FY1 1LZ stating you wish to be removed from the 'Greening Blackpool SPD Consultation Database'
- Once the Greening Blackpool SPD is adopted we will email you to ask if you wish to be removed from the list for future planning policy communications from Blackpool Council.

1. Do you have any comments to make on the Greening Blackpool SPD? (Please state paragraph number where applicable)

Continue on a separate sheet/expand box if necessary

2

Draft Greening Blackpool SPD
Comments Form –September 2021

Draft Greening Blackpool SPD
Comments Form –September 2021

Declaration

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

Signature:

Date:

[Email Form](#)

Figure 4: Email sent to consultees

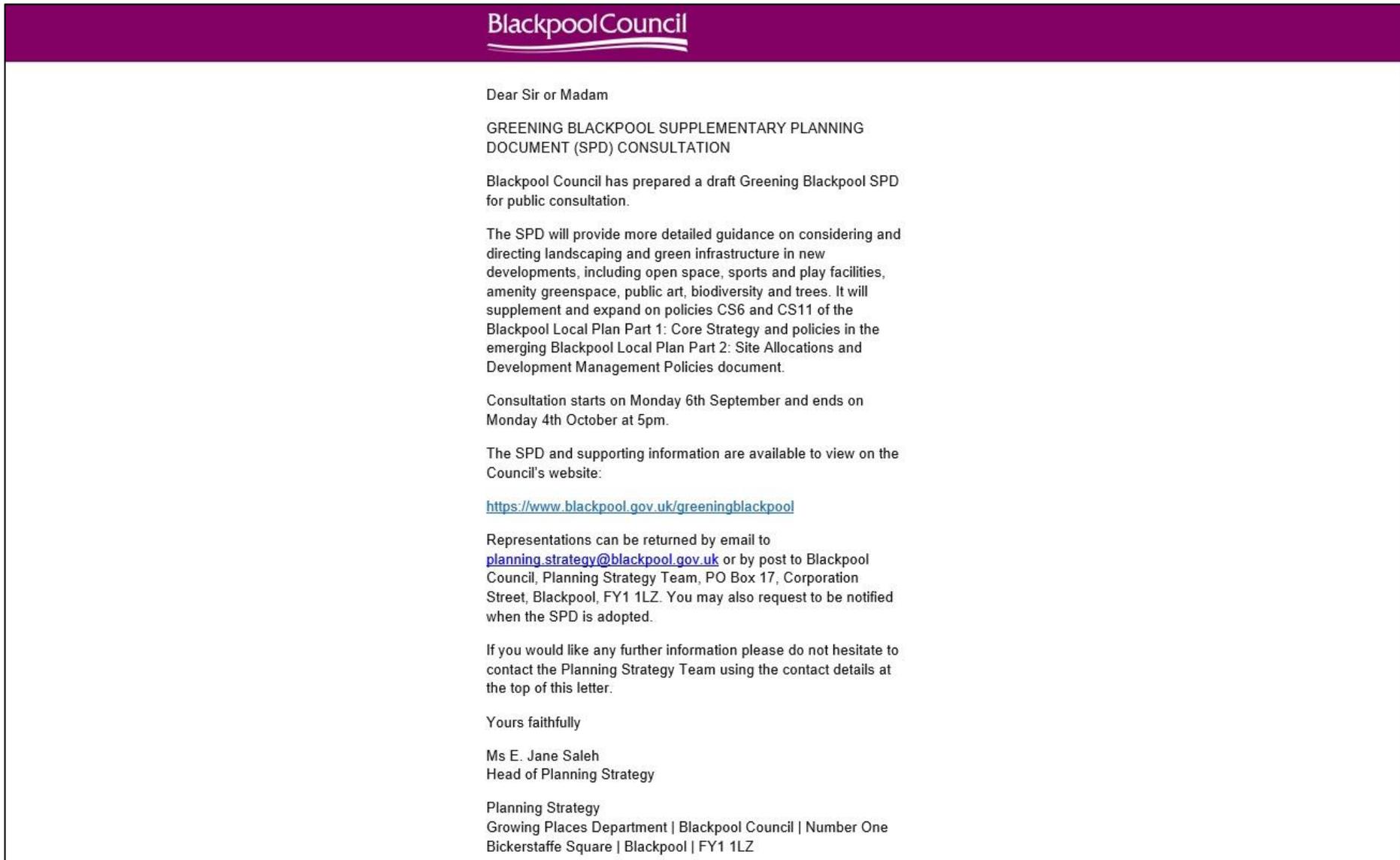
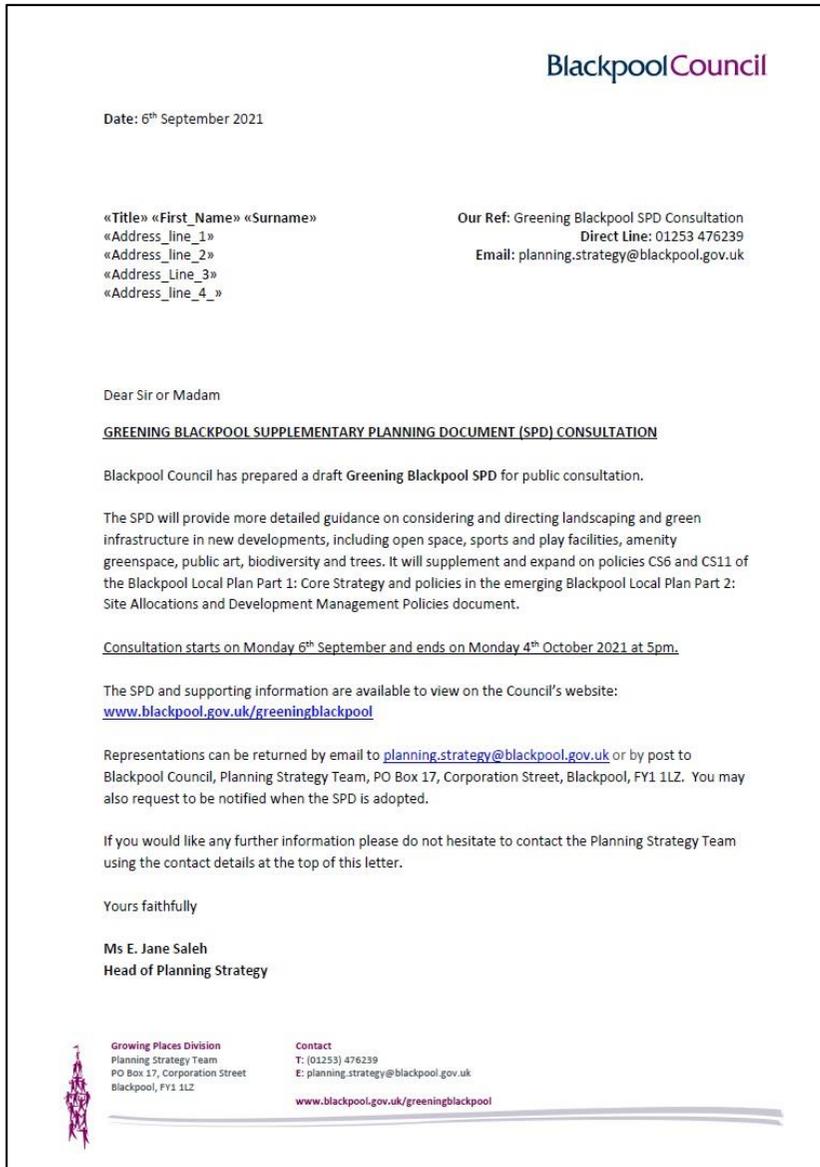


Figure 5: Letter sent to consultees without an email address



Appendix B: Specific (Statutory) and General Consultees notified

Specific / Statutory Consultees	
Homes England	National Grid Land & Development
Lancashire County Council	Coal Authority
Fylde Borough Council	Environment Agency
Wyre Borough Council	Historic England
Preston City Council	Natural England
St Anne's Parish Council	Highways England
Westby with Plumpton's Parish Council	Network Rail
Staining Parish Council	
NHS England	Marine Management Organisation
British Gas Properties	Orange
Electricity North West	O2
United Utilities	BT Group Plc, Regional Manager North West
Hutchinson 3G UK Limited (Three)	Mono Consultants Limited
Mobile Operators Association	T-Mobile
	Vodafone

General / Non-Statutory Consultees	
Elected Representatives	Youth Groups, Schools, Colleges
Blackpool North MP	Blackpool Young People's Council & Blackpool Voice
Blackpool South MP	Blackpool & Fylde College
European MPs	Blackpool Sixth Form College
Blackpool Councillors	Blackpool Scouts Service Team
Bodies representing Disabled People	Revoe Community Primary School
Fylde & Wyre Society for the Blind	
Motor Neurone Equalities Forum	Local Businesses / Business Groups

Leonard Cheshire North West Region	Business Link Lancashire
Princess Alexandra Home for the Blind	Federation of Small Businesses
Blackpool Society for Mentally Handicapped	Lancashire Economic Partnership
Blackpool Fylde & Wyre Mind	Blackpool Self-Catering Association
Deaf Society	StayBlackpool
Fibromyalgia Support Group	Lancashire and Blackpool Tourist Board
RNIB	Blackpool Fylde & Wyre Trades Union Council
	North & Western Lancashire Chamber of Commerce
Voluntary Bodies	
Council for Voluntary Service	CL Edwards & Sons Ltd
Barnardos Blackpool Project	Blackpool Licensed Taxi Operators Assoc.
Blackpool SURF	Campaign for Real Ale (CAMRA)
Community Futures	Lancashire Fire & Rescue Service HQ
Blackpool Friends of Kingscote Park	Tesco
Blackpool & Fylde Rail Users' Association	Blackpool BID
Friends of the Grand	Town Centre Manager
	Advice Link
Public Transport Operators	
Blackpool Transport Services Ltd	Blackpool Major Retailers Consortium
First North Western	Citizens Advice Bureau
Northern Rail	Blackpool Airport
Virgin Trains (North West Region)	Real TimeUK North
	King Street Dental Surgery
Conservation, Preservation & Amenity	
Civic Trust Regeneration Unit	Blackpool & Fylde Friends of the Earth
CPRE Lancashire Branch	Fylde Coast Bridleways Assoc.
Council for the Protection of Rural England	Fylde Coast Cycling Action Group
Lancashire Wildlife Trust	Ramblers Association
RSPB	RSPB
National Playing Fields Association	Sport England

Sustainability North West (SNW)	Bourne Leisure
Theatres Trust	Blackpool Football Club
The Woodland Trust	Job Centre Plus Blackpool
Conservation Officer Lancashire Wildlife Trust	Blackpool Airport
Fylde Bird Club	Evening Gazette
Blackpool Environmental Action Team (BEAT)	
Blackpool & Fylde Conservation Volunteers	Martin Yates Independent Living Services
Blackpool Civic Trust	Blackpool Pleasure Beach
Different Religious Groups	Carers UK
Faith Forum	Beneast Training Ltd
Blackpool Congregations of Jehovah's Witnesses	Progress Recruitment
	Royal Mail Group Plc
Other	Department For Constitutional Affairs
Lancashire Constabulary	Public Sector Manager Ubiquis
	Relate Lancashire
	Blackpool Combined Association
	Blackpool Connexions
	Morrison Supermarkets PLC
	Noble Organisation
	Warburtons Fylde Ltd

This page is intentionally left blank

Report to:	EXECUTIVE
Relevant Officer:	Alan Cavill, Director of Communications and Regeneration
Relevant Cabinet Member:	Councillor Mark Smith, Cabinet Member for Business, Enterprise and Job Creation
Date of Meeting:	25 April 2022

LEVELLING UP FUND ROUND 2

=

1.0 Purpose of the report:

1.1 This report is to summarise the main provisions of the Levelling Up Fund (LUF) Round 2 further to the launch of the full bidding guidance on the 23 March 2022 and to inform the Executive of the proposed approach to bidding.

2.0 Recommendation(s):

2.1 To note the Round 2 Levelling Up Fund guidance.

2.2 To agree the proposed approach to developing a up to 3 bids as set out in Paragraph 6.4 with the Multiversity being the core transformational project of a joint bid for the Blackpool North and Cleveleys, and Blackpool South constituencies (subject to confirmation from the Department of Levelling Up, Homes and Communities).

2.3 To continue consultations with both MPs, Wyre Council and other key stakeholders to ensure that the strongest bid(s) are submitted with the best chances of success.

2.4 To explore the most appropriate methods of securing investment in the Regeneration Areas as referenced in Paragraph 6.4 whether via Levelling Up Fund, Shared Prosperity Fund or Homes England.

2.5 To delegate to the Chief Executive, after consultation with the Leader of the Council, the submission of the final bids by the deadline of 6 July 2022 and for the Executive to receive a report on the final submissions.

2.6 To approve the signing by the Head of Legal Services of the Multiversity Memorandum of Understanding between the Council and Blackpool & The Fylde College regarding the preparation of a business case to secure funding for the construction of the Multiversity noting that this was a condition of the Town Funds £9m scheme approval (Appendix 5a).

2.7 To note that the costs of preparing the Multiversity business case costs are being finalised with Blackpool and The Fylde College and that if any costs are to be incurred outside of approved budgets or existing delegations then these will be reported separately to the Executive if required.

3.0 Reasons for recommendation(s):

3.1 Round 2 of Levelling Up Fund was referred to in the Levelling Up White Paper launched 22 February 2022 with full detail released on the 23 March 2022. Blackpool has the opportunity to submit bid(s) into the Fund by the 6 July 2022 closing date, resulting in the need to move quickly to establish arrangements for formulating bid content with the maximum chance of success.

The signing of the Memorandum of Understanding over the Multiversity scheme was a requirement of the initial Towns Fund £9m approval and is essential if the scheme is to be pursued as a priority through Levelling Up Fund.

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

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

4.0 Other alternative options to be considered:

4.1 The Council could choose not to bid. The guidance for submission into the Fund and the initial deadlines to be met are clearly set and immovable. It is an opportunity and competitive bidding process of which Blackpool must take advantage to support its ambitious regeneration agenda and many needs. Blackpool has remained in the highest priority Category 1 status which is very much in its favour. There are no guaranteed future rounds at this stage so it is imperative that Blackpool takes advantage of the opportunity in this round. All funding provided from the Fund has to be spent by 31 March 2025 and by 2025-26 on an exceptional basis which also influences scheme choice available.

The only other options to be considered would be alternative projects but a review of the most eligible and viable projects will be undertaken as part of this process in any event.

5.0 Council priority:

5.1 The relevant Council priority is: "The economy: Maximising growth and opportunity across Blackpool".

6.0 Background information

- 6.1 As part of the 2021 Budget the Chancellor announced a broad package of complementary UK-wide interventions one of which included the Levelling Up Fund, which was revisited in the light of the “Levelling Up White Paper” launched on 2nd February. The White Paper articulated how government policy interventions will improve opportunity and boost livelihoods across the country as we recover from the pandemic and contains many specific references to Blackpool.

Round One of Levelling Up Fund (launched March 2021) noted how it would “invest in local infrastructure that has a visible impact on people and their communities and will support economic recovery. The Fund is designed to help local areas select genuine local priorities for investment by putting local stakeholder support, including the local MP where they want to be involved, at the heart.

The first round of Levelling Up Fund was announced at the 2020 Spending Review to support communities in realising this vision. Focusing on capital investment in local infrastructure, building on and consolidating prior programmes such as the Local Growth Fund and the Towns Fund, the first round of Levelling Up Fund supported £1.7 billion of projects in over 100 local areas across all corners of the UK, delivering over £170 million of funding in Scotland, £120 million in Wales, and £49 million in Northern Ireland.

In June 2021, Blackpool submitted a Round 1 bid which was unfortunately unsuccessful. The application was for the maximum of £20m focused on 3 schemes:
The Town Centre Access Scheme (TCAS) with a £8.91m LUF request.
A grant of £6.93m Levelling Up Fund to private sector developer Ashall for the redevelopment of the Abingdon Street Post Office into an Indigo brand hotel, and,
The refurbishment of the Winter Gardens on Coronation Street for exhibition space with a Levelling Up Fund request of £4.16m.

Oral feedback on the Council’s Round 1 bid was provided in December 2021 to senior Council officials and both Blackpool MPs. Unfortunately, the feedback was not as helpful as it might have with limited explanation provided as to what caused the bid to be unsuccessful in order to be able to shape a successful bid in the next round. Although resubmission of improved projects in Round 2 is possible it is still unclear as to whether any or all of these bids would be successful if resubmitted.

6.2 Round 2 bidding

The guidance ([Levelling Up Fund Round 2: prospectus - GOV.UK \(www.gov.uk\)](https://www.gov.uk/levelling-up-fund-round-2-prospectus)) states that investing in infrastructure has the potential to improve lives by:

- giving people pride in their local communities;
- bringing more places across the UK closer to opportunity; and
- demonstrating that government can visibly deliver against the diverse needs of all places and all geographies.

Levelling Up is at the heart of the government's agenda to build back better after the pandemic and to deliver for citizens in every part of the UK. It recognises that levelling up requires a multi-faceted approach and the Fund is delivered as part of a broad package of complementary UK-wide interventions such as the UK Community Renewal Fund, The UK Community Ownership Fund, the Towns Fund, and the forthcoming UK Shared Prosperity Fund (UKSPF).

The Levelling Up White Paper builds on these foundations, with a clear plan to level up every corner of the UK. It is underpinned by 12 ambitious missions over 10 years. The second round of the Fund will focus on the same three investment themes as the first round, i.e.: local transport projects that make a genuine difference to local areas; town centre and high street regeneration; and support for maintaining and expanding the UK's world-leading portfolio of cultural and heritage assets. In particular, the Fund will look to support:

- a) **Transport investments** including (but not limited to) public transport, active travel, bridge repairs, bus priority, local road improvements and major structural maintenance, and accessibility improvements. Proposals should be for high-impact small, medium and, by exception, large local transport schemes to reduce carbon emissions, improve air quality, cut congestion, support economic growth, and improve the safety, security and overall experience of transport users.
- b) **Regeneration and town centre investment**, building on the Towns Fund framework to upgrade eyesore buildings and dated infrastructure; acquire and regenerate brownfield sites; invest in secure community infrastructure and crime reduction; and bring public services and safe, accessible community spaces into town and city centres.
- c) **Cultural investment** maintaining, regenerating, or creatively repurposing existing cultural, creative, heritage and sporting assets, or creating new assets that serve those purposes including theatres, museums, galleries, production facilities, libraries, visitor attractions (and associated green spaces), sports and

athletics facilities, heritage buildings and sites, and assets that support the visitor economy. A change for the second round of the Fund, is an ability to fund up to two large bids (UK wide) for up to £50 million under the Fund's culture and heritage investment theme. These bids must be for flagship projects and be in line with the Fund's focus on highly visible interventions that boost local pride in place. These must be for at least 90% culture.

Key points of note from Round 1, which also apply to Round 2, are :-

- Investment proposals should focus on supporting **high priority and high impact projects** that will make a visible positive difference to local areas.
- Schemes should look to be **transformational** in nature with a clear demonstrable impact provided to communities.
- Projects need clearly to demonstrate how proposed investments will **support relevant local strategies** and show why the proposed investment or set of investments represents the **highest value local priorities**.
- Projects should be aligned to and **support net zero goals**, including those set out in the UK government's net zero strategy and sector-specific plans such as the Heat and Buildings Strategy where relevant. For instance, projects are encouraged to demonstrate low or zero carbon best practice; adopt and support innovative clean tech and/or support the growth of green skills and sustainable supply chains.
- Bids should also consider how projects can **work with the natural environment** to achieve project objectives – considering at a minimum the project's impact on our country's natural assets, as well as the resilience of any capital infrastructure project to potential hazards such as flooding.
- Where applicable, proposals should consider how they strengthen the work of Councils and multi-agency partners in **tackling a range of community safety issues and reducing crime**.
- Applicants are encouraged to include detail of how their LUF projects would **complement other sources of funding**, for example the UK Shared Prosperity Fund.
- If it is a "package" bid including up to 3 schemes, the **projects should be able to demonstrate some cohesive thread**. They can include a mix of projects from the Fund's three investment themes but any one bid should not include multiple unrelated investments.
- Clear **demonstration of engagement and support** are therefore key requirements.
- Minimum of **10% co-funding**
- Projects must be able to **demonstrate spend in 2022/23 and begin delivery on the ground early**. All funding provided from the Fund has to be spent by 31st March 2025 and by 2025-26 on an exceptional basis which also influences scheme choice available.
- **Support of the MPs** in whose constituency the proposals lie is expected but they do not have power of veto.

The assessment process will again focus on the following key criteria:

- **Characteristics of the place** – the local authority category representing the highest identified need (Blackpool is in the highest Category 1).
- **Deliverability**
- **Strategic fit with local and Fund priorities**
- **Economic Case** - Value for money should be demonstrated to outline and explain the benefits of the bid and how it represents value for money.

6.3 **How Many Bids can Blackpool submit?**

Local authorities can submit one bid for every MP whose constituency lies wholly within their boundary. Where an MP's constituency crosses multiple local authorities, one local authority should take responsibility as the lead bidder and local areas should work together to designate that lead bidder. Whilst not having a power of veto, MP support is deemed as a strong part of the assessment. Blackpool South lies wholly within Blackpool. Blackpool North and Cleveleys lies within Blackpool and Wyre.

With having two MPs' constituencies in our area we potentially qualify for two bids. A bid can be a single project or "package" bid with a maximum of 3 (cohesive) projects in each up to a total value of £20m per submission. NB a query has been submitted to Department for Levelling Up, Housing and Communities whether the two bids could potentially be combined to have an overarching bid supported by both MPs as opposed to 2 separate bids which would be more expensive to produce.

Additionally, as a Transport Authority, Blackpool can also qualify for a third transport specific bid of up to £20m.

Finally, by exception there is an option to apply for a £20-£50m transport scheme (most likely requiring cross-boundary support and hence Lancashire County Council support and lead would be required in this case).

Note: Local authorities may submit joint bids. The maximum bid size for joint bids will be determined by adding up the individual £20 million caps of each bidding authority. Therefore, for example, a joint bid with Wyre Council for the Blackpool North and Cleveleys area could amount to a maximum submission of £40m. Joint bids will count towards the maximum number of bids that each local authority is able to submit. Joint proposals can contain a combination of interventions across borders. However, they must not be a disparate package of interventions.

6.4 **Proposed Approach to the bid(s) and related opportunities for funding**

There is a very short timescale between the bid process commencing (March 23rd) and release and the submission deadline for bids (6th July) and managing expectations of the variety of stakeholders is also a challenge.

Blackpool has far more potential scheme ideas than the funds/number of bids allowed to be made, but the eligibility criteria reduces what is possible and there is a significant issue of needing to get any schemes sufficiently developed in order to be able to make a strong Levelling Up Fund bid, especially when it was originally hoped to get funding for some regeneration areas of Claremont and Waterloo Wards through the Community Renewal Fund which did not materialise.

Therefore, there has been a need to identify what the possibilities were and how they can be worked up sooner rather than later (and the financial and staff resource to do this) so that the Council is on the front foot. Capacity funding of £125k was allocated to Blackpool at round 1 stage of which £66k was committed to support project development costs and consultancy fees for the Round 1 bid so £59k remains although if the Post Office and TCAS bids are resubmitted some of those costs would be saved.

With a view to moving scheme ideas forward an internal Council meeting was held on the 19 January 2022 with attendees from across relevant Council departments and also from Genecon Consulting who supported the Council in Round 1 and was also involved in other bids which were successful.

As well as a trawl of potential schemes what was emphasised was the need first and foremost for the Council to be clear on its strategic priorities and then to see which of those schemes are best placed :

- to meet the Fund's criteria to have the maximum chances of success.
- to meet the Executive's and the local MP's aspirations

As part of its Growth and Prosperity Programme the Council's key strategic priorities are:

- Town Centre Regeneration including:
 - Talbot Gateway
 - Blackpool Central
- The Regeneration Areas:
 - Revoe
 - Claremont
 - South Blackpool
- Blackpool Airport Enterprise Zone

In the Blackpool North and South regeneration areas in particular, potential schemes are not, as yet, well defined and notwithstanding the many needs in these areas there is a serious question over whether schemes which the Council and partners want to see happen can meet the success criteria which appeared to govern Levelling Up Fund 1.

So, for example, whilst both Revoe and Claremont have Masterplans prepared they are currently considered not to contain “oven-ready” schemes and there would be significant work to be undertaken, at a cost, to get schemes to a bid compliant stage. In both Claremont and Waterloo areas, work that the Council had been hoping would be funded through Community Renewal Fund did not receive any funding approval.

However, further opportunities beyond the Levelling Up Fund have now arisen which are likely to be better suited to achieving the Council’s strategic objectives in the Regeneration Areas.

In conjunction with Homes England, in February 2022 it was agreed to prepare a Masterplan and Regeneration Framework for the broader area of Blackpool South one of the purposes of which will be to identify transformational projects which can subsequently be developed into business cases for funding bids. Homes England have funded this work and whilst it is not due for completion until September 2022 the commission includes the need to explore any opportunities as early as possible that may be forthcoming during the course of the Commission. Whether any of these schemes are strong enough for a Levelling Up Fund bid remains to be seen but timescales and the hard-edged Benefit Cost Ratio (BCR) requirements make inclusion as a LUF bid challenging. They may therefore be better suited to two other opportunities from which Blackpool will also be able to benefit.

One of UK 20 Regeneration Areas

Firstly, as part of the recent Levelling Up announcements by Government Blackpool has been designated as one of 20 appointed Regeneration Areas nationally highlighted for Kings Cross style regeneration support (17th March 2022). <https://www.gov.uk/government/news/new-plans-to-level-up-blackpool-unveiled>). No precise funding announcement has yet been made but we are working with Homes England to ensure that the benefit to the regeneration areas will be maximised through this work and the Blackpool South Regeneration Framework and Masterplan is a part of that.

Shared Prosperity Fund

Secondly, Blackpool will receive an allocation over the next 3 financial years from the Shared Prosperity Fund (SPF) the quantum of which is yet to be confirmed. Guidance on this is due in the Spring but in the meantime pre-guidance was issued by Government in February which notes the Shared Prosperity Fund is a government fund that will provide £2.6bn to be fed into local investments by March 2025. All areas of the UK will receive an allocation, based on a funding formula. The Fund’s interventions will be planned and delivered by local authorities across England, Scotland and Wales. The Fund will replace some previous funding streams that came about via the UK’s membership of the European Union.

The primary goal of the Shared Prosperity Fund is to build pride in place/increase life chances across the UK, in line with the four parts of Levelling Up:

- Boost productivity, pay, jobs and living standards, especially in those places where they are lagging.
- Spread opportunities and improve public services, especially in those places where they are weakest.
- Restore a sense of community, local pride and belonging, especially in those places where they have been lost.
- Empower local leaders and communities, especially in those places lacking local agency.

The Fund will enable improvements to the places where people live, as well as supporting individuals and businesses. There are three investment priorities, for which more detail will be provided in a full prospectus later this spring:

- a) Communities and place
 - Strengthening the social fabric and fostering a sense of local pride and belonging, through investment in activities such as community infrastructure and local green space, and community-led projects.
 - To build resilient and safe neighbourhoods, through investment in quality places and, through targeted improvements to the built environment and innovative approaches to crime prevention.
- b) Local businesses
 - Creating jobs and boosting community cohesion
 - Promote networking and collaboration, through interventions that bring together businesses and partners within and across sectors.
 - Increase private sector investment in growth-enhancing activities
 - People and skills
 - Boost core skills and support adults to progress in work.
 - Support disadvantaged people to access the skills they need to progress in life and into work,
 - Support local areas to fund local skills needs and supplement local adult skills provision
 - Reduce levels of economic inactivity and move those furthest from the labour market closer to employment

As well as the investment priorities, each place will have to invest a ring-fenced amount of the Fund in “Multiply” interventions, to enhance adult numeracy. This will be managed by the Department for Education, with investment totalling up to £430m by March 2025. Interventions supported by the Shared Prosperity Fund will have to take into account other policies and priorities, including the national Net Zero commitment.

Each place in the UK, in order to access their conditional Shared Prosperity Fund allocation, has to present an Investment Plan setting out measurable outcomes and prioritised interventions to Government. Investment Plans will cover a three year period. Submission date is not known at this time.

Approach to the Levelling Up Fund Bids

From various discussions with the Department for Levelling Up, Housing and Communities, both Blackpool MPs and others, received wisdom now is that success in Levelling Up Fund terms is probably best achieved by going big and bold rather than attempting to spread a bid too thinly, especially when demand for funding is going to substantially exceed supply.

To this end, supportive initial discussions have been held with both MPs and Government officials where a joint bid could have as its core funding to secure the construction of the transformational Multiversity (for which Town Deal funding has been secured to acquire the necessary site) with its anticipated major impact on the economy through skills improvements and footfall in the town centre, whilst also aiming to identify potential additional schemes in the Regeneration Areas in Blackpool North and South constituencies and the best route to securing their funding if this is not through Levelling Up Fund, as set out above.

With regard to the original Levelling Up Fund Round One bid the Post Office transformation of an iconic building with private investment was felt to be a strong candidate for resubmission. The Post Office scheme, and the branding approach to be adopted by IHG with regard to the interpretation of the Listed Building in the context of its location (a specialist requirement of their Indigo Brand) means that it is likely to be a strong fit with 2 of the Levelling Up themes (Town Centre Regeneration and Investment and Cultural Investment

In addition a reworked Town Centre Access scheme with additional cycling and active travel measures which would allow the scheme to meet the Cycle infrastructure design (LTN 1/20) guidance could be a strong transport only scheme contender

Discussions are also continuing with Wyre officers in relation to any Blackpool North and Cleveleys bid and how that might complement a Blackpool bid.

Detailed work is now taking place using external expertise where relevant to ensure that Blackpool puts itself into the strongest possible position to secure a Levelling Up Fund Round 2 bid and ensure that the opportunities of being one of the 20 nationally designated Regeneration Areas and Shared Prosperity Fund are utilised to achieve the Council's strategic regeneration objectives

6.5 Multiversity Memorandum of Understanding

One of the conditions of the Town Deal funding for the Multiversity was that the Council and Blackpool and Fylde College entered into a Memorandum of Understanding to commit to preparing a business case to support any applications for funding. This requires a commitment to sign by both parties (See Appendix 5a) which is exempt from publication.

6.6 Management and Governance Arrangements

Should the Council be successful with its bid(s) it is required to directly enter into a funding agreement with the Department for Levelling Up, Housing and Communities. The Council will also potentially need to enter into legal agreements with local delivery partners e.g. Blackpool and The Fylde College (via direct appointment or further to tender) for which Executive Approval is hereby requested. The role will also require undertaking claims, monitoring and assurance activity.

As the accountable body, Blackpool Council will retain overall responsibility for the delivery of the projects with reports to the Corporate Leadership Team, Executive and Government as required.

6.7 Does the information submitted include any exempt information? No

7.0 List of Appendices:

7.1 Appendix 5a – Memorandum of Understanding which is currently exempt from publication by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972. It is considered on balance that the public interest would be not served by publishing information at this stage as this information would undermine the Council's position in future negotiations..

8.0 Financial considerations:

8.1 Without Levelling Up Funding, the schemes would not be pursued. Where any co-funding is required, this will be agreed further to bid submission. The balance of capacity funding and existing budgets will be utilised to develop bids.

9.0 Legal considerations:

9.1 As noted above, a legal project delivery agreement will be in place between Department for Levelling Up, Housing and Communities and the Council which will require to be developed and monitored accordingly. Further legal agreements with Blackpool and The Fylde College or other private sector organisations may be required subject to final schemes being submitted.

10.0 Risk management considerations:

10.1 With all major schemes there are risks, and each scheme will have a risk assessment developed and allocated to it.

11.0 Equalities considerations:

11.1 There are no anticipated equalities issues with the proposals outlined. With regards to Levelling Up fund projects which are capital based, where any development requires new build or redesign full equalities and accessibility requirements will be taken into account at the design stage and in lien with building control requirements.

12.0 Sustainability, climate change and environmental considerations:

12.1 Reducing the impact of climate change and ensuring sustainability will be taken into account as projects need to evidence how they will work towards the aims of the government “Net Zero” policy as a requirement of the bid submissions. The Multiversity has an ambition to be a net zero carbon building.

13.0 Internal/external consultation undertaken:

13.1 With the Levelling Up Fund the Town Deal Board and its engagement processes alongside Corporate Leadership Team and MPs will provide an established method of consultation on projects.

14.0 Background papers:

14.1 None.

15.0 Key decision information:

15.1 Is this a key decision? Yes

15.2 If so, Forward Plan reference number: 1/2021

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

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

16.0 Call-in information:

16.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process?

No

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

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

17.0 Scrutiny Committee Chairman (where appropriate):

Date informed: 13 April 2022 Date approved:

18.0 Declarations of interest (if applicable):

18.1

19.0 Summary of Discussion:

19.1

20.0 Executive decision:

20.1

21.0 Date of Decision:

21.1

22.0 Reason(s) for decision:

22.1

23.0 Date Decision published:

23.1

24.0 Alternative Options Considered and Rejected:

24.1

25.0 Executive Members in attendance:

25.1

26.0 Call-in:

26.1

27.0 Notes:

27.1