

## APPENDIX B

### Overview of the Changes to the Proposals and Policies in the Core Strategy Proposed Submission June 2014 compared to the Revised Preferred Option May 2012

#### 1.0 Purpose

1.1 This report provides an overview of the key changes to the proposals and policies set out in the Proposed Submission compared to the Revised Preferred Options document (May 2012). The changes have been made in response to the representations received to the June/July 2012 consultation; to updated evidence base documents and new government guidance.

#### 2.0 Core Strategy - Proposed Submission

2.1 **Chapter 1 – Introduction** – This chapter has been reworded to reflect this latest stage of the Core Strategy preparation.

2.2 **Chapter 2 – A Spatial Portrait of Blackpool** – This chapter provides information on the existing circumstances in Blackpool with respect to its people, economy, housing, neighbourhoods, environment and transport. The chapter ends with a summary of the overarching issues facing Blackpool setting the scene for those issues that the policies in the Core Strategy need to be addressing. Very minor changes have been made to this chapter in response to representations and to reflect more up-to-date information made available.

2.3 **Chapter 3 – Spatial Vision and Objectives** – The Spatial Vision sets out where Blackpool aspires to be by 2027 and responds to the key issues and characteristics summarised in Chapter 2. 13 responses were received; the vast majority are generally supportive of the Vision. A minor amendment has been made to the Vision to acknowledge the wider resort tourism offer.

2.4 In considering the 19 responses to the Objectives the following minor amendments have been made:

- **Objective 11** to provide an appropriate hook to subsequent Development Management policies to include healthy eating measures (in response to a comment from Blackpool PCT);
- **Objective 12** to acknowledge improving aspirations (in response to a comment from Blackpool & Fylde College);
- **Objective 21** to clarify the new infrastructure in South Blackpool will enable new sustainable development which integrates with its surroundings (indirectly responding to a comment from Sainsbury's)
- **Objective 13** to simplify reference to traveller sites.

2.5 Other suggested changes / comments were not considered to warrant further changes to the objectives.

2.6 **Policy NPPF1 – 'Presumption in Favour of Sustainable Development'**. Paragraph 15 of the National Planning Policy Framework<sup>1</sup> (NPPF) requires Local Plans to be '*based upon and*

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<sup>1</sup> Published 27 March 2012

*reflect the presumption in favour of sustainable development with clear policies that will guide how the presumption should be applied locally*'. The Planning Inspectorate has advised that to meet the expectation of paragraph 15, local planning authorities should include in their local plans a suitable policy. 'Model wording' has been set out on the Planning Portal website which is considered to be an appropriate way of meeting the requirement. 9 responses were received to this policy, the majority of which were supportive. The CPRE in their comments suggested the policy should have a more meaningful local agenda. However recently adopted Local Plans have included this model policy therefore we are not proposing any change.

- 2.7 **Chapter 4 – Spatial Strategy – Policy CS1 – Strategic Location of Development** sets out the strategic location of development the dual strategy focus on regeneration and supporting growth.
- 2.8 10 responses were received to this policy and supporting text. There is general support for the policy with comments largely requesting additional detail to be added such as the policy approach to Marton Moss, development in South Blackpool, recognition of the tourism offer outside the Resort Core and specific reference to existing attractions. However, given this is an overarching policy and the Core Strategy policies are to be read as a whole, this additional detail is not considered necessary here. Where appropriate the comments made have been addressed in relevant policies.
- 2.9 Minor amendments have been made in the policy / supporting text to amend the description of the Resort Core (indirectly responding to a comment showing confusion in its role); to clarify the area defined as South Blackpool; and for wording to be consistent with the wording in the Duty to Co-operate Memorandum of Understanding (MOU).
- 2.10 **Chapter 5 – Core Policies** – The 9 Core policies in this chapter are grouped together as they are considered to be strategic overarching policies, guiding development and informing proposals across the Borough.
- 2.11 **Policy CS2 – Housing Provision** – This policy sets out the level of new homes to be developed in Blackpool over the 15 year period 2012 to 2027.
- 2.12 15 responses were received to this policy and supporting text - 3 of which were submitted from housing developers (The Emerson Group, Bellway Homes and Gleeson Homes) and 2 of which were submitted on behalf of key landowners looking to develop (Closelink (Whyndyke Farm) and Savills ( NS&I site)).
- 2.13 **A new housing figure of 4,200 dwellings (280 on average p.a.) is proposed in the Proposed Submission Core Strategy**, which compares to the previous figure of 4,500 dwellings (300 on average p.a.) in the Revised Preferred Option. This figure is supported by the new 2013 Fylde Coast SHMA (published Feb 2014) as well as other relevant evidence, including aligning housing growth with economic prosperity and the level of housing considered realistic to deliver in the Borough.
- 2.14 The new SHMA provides an up-to-date assessment of Blackpool's objectively assessed housing need, which has been arrived at using a standard methodology recognised by Government. The need to align housing growth with economic prosperity in Local Plans accords with the NPPF and Government guidance, and further work was undertaken to analyse alternative employment forecasts to support the setting of a housing figure based on a realistic number of jobs expected to be delivered in Blackpool over the plan period.

- 2.15 From this work, Oxford Economics forecasts' were considered to be the most appropriate to use. A review of market signals, including historic delivery rates, challenging issues with development viability (as evidenced in the 2014 Viability Study Report) and the available capacity of land was also considered. This addresses consultee comments which:
- stressed the need to justify the housing provision figure and base it on the most up-to-date evidence available (including the latest ONS figures/projections and an up-to-date needs assessment);
  - questioned whether the housing provision figure met the identified need given the reduction from the previous RSS target;
  - queried whether this scale of housing was needed and linkages with job prospects; and
  - stressed the need to consider shortfall / backlog as well as provide a 5/20% buffer in line with NPPF.
- 2.16 In terms of the buffer, this does not increase the requirement but is a flexibility allowance to be added onto the five year supply. The supporting text in the Proposed Submission has been amended to acknowledge the need to apply an appropriate buffer to accord with NPPF. In recognition of persistent levels of under-delivery against previous plan targets a **20% buffer is proposed**. The updated Housing Technical Paper and the 2013 SHLAA update, published to coincide with the Proposed Submission Core Strategy, include this buffer in demonstrating a 5 year supply.
- 2.17 In terms of supply, the identified sources remain unchanged and include Major Regeneration Sites, Existing Urban Area, South Blackpool Growth and Windfall Allowance, although reference to these has been simplified in the policy to provide clarity. The indicative figures which comprise the 4200 dwelling figure have been removed from Policy (to provide more flexibility) with the figures remaining in the supporting text.
- 2.18 The supporting text has been reworded to ensure sufficient detail is provided to explain these sources and the level of housing expected to come forward from each. It also reflects the latest housing strategy, including bringing back empty homes into use, which are now identified within the windfall supply. These amendments address consultee comments which asked for clarity on the housing distribution, queried the justification for a windfall allowance and raised the issue about the re-use of empty homes.
- 2.19 Other comments about supply and delivery, including querying housing delivery in the inner areas, justifying a windfall allowance, the exclusion of remaining lands on Marton Moss, the inclusion of Greenfield sites, the assessment of SHLAA sites and whether the Council is able to demonstrate a sufficient supply are addressed in the updated Housing Technical Paper which includes a section on housing delivery. The HTP also deals with the issue of ensuring the housing needs of the wider sub-region are being met, working with neighbouring authorities to address any unmet need where applicable. This issue was also raised in consultee comments.
- 2.20 Finally, the supporting text has been amended in relation to a phased approach to housing delivery (250 dwellings per annum between 2012 – 2017, increasing to 280 per annum between 2017 – 2022 and 310 per annum between 2022 – 2027) which is justified on changing economic prosperity over the plan period and market factors including realistic delivery rates.
- 2.21 **CS3: Economic Development and Employment** - 11 responses were received to this policy and supporting text. Part 1a) of the policy has been amended to refer to new employment development on remaining available land and through opportunities for redevelopment in response to a comment asking for clarification; and 1c) has been amended to reflect the Duty

to Co-Operate MOU wording. The supporting text has also been amended to align with the MOU and to strengthen reference to the wider Lancashire sub-regional economy (in response to a comment by LCC).

- 2.22 The supporting text has been amended to acknowledge the findings of the 2013 Employment Land Review (published 2014), including an up-dated employment land assessment, available land supply and future requirements. Specifically, **it updates the baseline land supply to 21.6ha but identifies a realistic supply of 17.8ha; meaning a shortfall in supply of 13.7ha against the assessed requirement of 31.5ha.** In doing so, this addresses comments submitted on behalf of NS&I about the need to base future requirements on a robust assessment and information provided by them on site constraints to redevelopment. (Available land on the NS&I site is no longer realistic to include in future supply which is why the supply figure is reduced). **The text is also now more explicit about Fylde BC helping to meet Blackpool's 14ha shortfall, to reflect the updated Duty to Cooperate position** (in doing so this addresses comments about previous uncertainty).
- 2.23 The supporting text has also been amended to:
- clarify the redevelopment opportunities on existing sites (indirectly responding to a comment asking for stronger reference to this);
  - remove reference to specific sites with enabling development opportunities to provide more flexibility (these are now identified in the Employment Land Review);
  - clarify that enabling development will need to be robustly justified and conform to wider plan objectives. This wording provides appropriate flexibility for the future use of sites, where robustly justified in accordance with NPPF. Explicit reference in the supporting text to retail is not considered necessary;
  - provide more clarity on South Blackpool - the Council will promote the sustainable development of sites on the Blackpool / Fylde boundary which are part of the Duty to Cooperate; and
  - to reflect the latest skills and employment strategies as well as further work on economic forecasts and economic prosperity by improving opportunities in the workforce (indirectly responding to a comment asking what the Council is doing to facilitate jobs and which sites are referred to in South Blackpool).
- 2.24 **CS4: Retail** - 9 consultees responded to this policy and supporting text. CBRE, LS Retail, Sainsbury's and Blackpool Pleasure Beach all raised concerns regarding part 1 (c) of the policy - the presumption against further development at out of centre retail parks. They commented that this statement is contrary to the guidance set out in paragraph 23 of the NPPF. The policy was written in line with the recommendations of the Fylde Coast Retail Study. In response to the representations, Part (c) is to be removed with further emphasis on the priority to strengthen the role of the Town Centre.
- 2.25 Blackpool Pleasure Beach raises concerns that tourism development is classed as a 'town centre use' in the NPPF and therefore part 3 of policy CS4 proposes strict control over all town centre uses. This part of the policy identifies criteria that need to be met for proposals for new retail development and other town centre uses. Due to the importance of Blackpool as a tourist destination, the Core Strategy recognises the importance of leisure and tourism and has a specific policy relating to Leisure and Business Tourism (CS27) which supports new tourism development in the Town Centre and Resort Core.
- 2.26 LS Retail and Sainsburys have suggested a specific policy should be included in the Core Strategy that sets out how edge and out of centre development proposals will be assessed. It is considered that out and edge of centre development is appropriately assessed using the

criteria set out in policy CS4.

- 2.27 **CS5: Connectivity** - 12 representations were received to this policy. Many comments pointed out the need for improved public transport provision in general and the need to encourage active transport such as cycling and walking and the need for improved signage including between parking facilities and attractions. NHS Blackpool in particular, mentioned the need for more walking and cycling with signage being a key method to encourage this. Many of the comments also requested that there be “more joined up” transport modes. With reference to the supporting text, Lancashire County Council pointed out the need to improve North/South connections and the strategic highways in the area. CPRE were supportive of the policy although did raise concerns regarding reference to aviation and increasing connections to the airport, due to the impact on sustainability.
- 2.28 In response to comments and to improve the clarity of policy, **policies CS5 and CS21 have been merged and restructured** to address the overlap in coverage of these policies and to bring the more strategic wording of CS21 into the more overarching Policy CS5. Parking measures have been given greater emphasis and explanation. Reference is made in the policy to the need to provide the town centre and resort core with enhanced links between car parks, transport hubs, and major existing and future attractions. It is also recognised in the policy that there is a need to provide improved signage for all transport modes and visitor information particularly in the town centre and resort core.
- 2.29 **CS6: Green Infrastructure** - 5 responses were received to this policy. Comments were supportive of the approach but suggested some amendments.
- 2.30 United Utilities suggest the Council should seek opportunities to use developer contributions to meet objectives, and to use green and open spaces, sports and recreation facilities to address surface water and climate change issues. They also suggested that building green infrastructure assets such as ponds, swales and wetlands would not only meet the Council’s green space needs but also their local existing and/or future surface water and climate change issues. One response raised concerns regarding flood risk and the effects of climate change and impacts on the green belt, and questions what safeguards are in place to protect residents.
- 2.31 In response to the representations, further clarity has been provided in the policy regarding the proposed approach to the green belt, which is to protect the character and openness of the green belt in line with national policy and the saved policy of the adopted Blackpool Local Plan (2006). In response to other comments received in relation to flood risk, an additional policy has been developed based on representations to give a clear steer on water management in new development (Policy CS9: Water Management).
- 2.32 In principle, the Environment Agency supported the policy but suggest stronger emphasis could be provided to requiring measures which seeks to preserve, restore and enhance local ecological networks and priority habitats/species. The proposed policy has been amended to reflect the Environment Agency’s comment.
- 2.33 Bourne Leisure supported the definition of green infrastructure provided in the supporting text and noted the balanced approach being taken particularly to economic considerations and benefits. However, they suggest that emerging policies on green infrastructure should recognised there is scope for appropriate development in areas adjacent to designated sites, such as local nature reserves, provided that commensurate mitigation measure are implemented to minimise both direct and indirect impacts. No changes have been made to the proposed policy with respect to this comment as this is covered by existing saved policies in the adopted Blackpool Local Plan.

- 2.34 A response received from Campaign to Protect Rural England (CPRE) strongly supports this policy, but feel it could be strengthened in a number of respects including
- avoiding loss of green infrastructure with a minimum requirement of no net loss of resource;
  - clarify that DPDs will seek to avoid allocating green infrastructure wherever possible.
  - clarify that enhancing green infrastructure must be in the context of maintaining or enhancing local distinctiveness and character, particularly in terms of heritage assets such as Stanley Park and listed structures;
  - a map of protected sites may be helpful, along with an indication of buffer zones.
- 2.35 The policy and supporting text have been amended to take on board the above comments made by CPRE. Furthermore, the CPRE response suggests that due to its unique characteristics within the Borough, Marton Moss should be specifically recognised and protected by this policy, however no amendment has been proposed as this is dealt with in Policy CS26: Marton Moss.
- 2.36 In addition there has been some minor rewording and re-ordering of the policy in places, reflecting comments to provide greater clarity and detail of how the Council proposes to protect, enhance, connect and creating new green infrastructure.
- 2.37 **CS7: Quality of Design** - 9 consultees responded with general support for the policy. There are no proposed changes as a result of representations received.
- 2.38 **CS8: Heritage** - 5 consultees responded to this policy and supporting text with general support for the policy. There are no proposed changes as a result of representations received.
- 2.39 **CS9: Energy Efficiency and Climate Change** - 6 responses were received to this policy, with some support given to the emphasis of the policy but also a number of concerns regarding some of the requirements which were considered to be onerous in places and could potential make development unviable.
- 2.40 The comments were split between the commercial companies, who were concerned that the policy would be a barrier to development, and CPRE and Environment Agency who pointed out where the policy did not provide sufficient clarify in its aims or did not go far enough in terms of the proposed requirements.
- 2.41 The policy has been amended to reflect the comments, providing greater clarity, rewording and rearranging where necessary and has been updated to reflect the recommendations of the Blackpool Local Plan and Community Infrastructure Levy Viability Study (2014), which has assessed the potential development costs of the proposed policies. Where necessary requirements that may significantly affect the viability of development have been removed or where appropriate caveats have been placed in policy to reduce the potential burden on developers and to ensure that where a requirement would mean that a development is no longer viable, that this can be avoided.
- 2.42 The Environment Agency were supportive of the policy in principle, but raised a number of suggestions which could strengthen, in particular, the water management aspects of the policy. It is considered that given the importance of water management and the need to ensure development does not increase the risk of flooding or impact on the quality of bathing water, a separate policy on Water Management (Policy CS9) has been developed to take account of the concerns raised by the Environment Agency and also more wider comments received from United Utilities on the Core Strategy. To avoid duplication,

- references to water management in other policies have been removed as these are now covered in CS9: Water Management (for example, part 2 of CS26: South Blackpool Housing Growth has been removed).
- 2.43 The remaining elements of the policy have been brought together in a policy re-titled 'Sustainable Design and Renewable and Low Carbon energy' (new Policy CS10) to more accurately reflect the emphasis of the policy; to reflect more recent evidence provided in the Viability Study and reflect proposed changes by government to limit the application of local standards to house building (as set out in the 'Housing Standards Review').
- 2.44 **CS10: Planning Obligations** - 4 responses were received to this policy and supporting text. Several were asking for a reference to be to certain infrastructure, whilst one consultee considered that part (b) of the policy was too vague. However it was considered that no changes were necessary to the policy in light of the comments received.
- 2.45 **CS11: Sustainable Neighbourhoods** - 5 responses were received to this policy. Comments were generally supportive, however a number of amendments were suggested including the need to include a reference to Brunswick, which has been included by amending the wording in the policy to read 'Talbot and Brunswick' neighbourhood.
- 2.46 Blackpool PCT requested a change to the policy which would support retail which enhances healthier lifestyle choices, such as fruit and vegetable shops over sweet shops or fast food. However the issues raised here are more appropriately considered when preparing Part 2 of the Local Plan - the Site Allocations and Development Management DPD. The PCT also requested that sustainable travel parking (cycle sheds) be included in the policy where apartments and flats are developed. This issue is covered by Policy CS5 Connectivity and in supporting documents such as the New Homes from Old Places SPD. No changes have therefore been made to the Sustainable Neighbourhoods Policy in response to the comments received from the PCT, however some re-ordering of the policy has been proposed to provide greater clarity.
- 2.47 **CS12: Housing Mix, Density and Standards** - 3 comments were received to this policy and supporting text, requesting:
- reference to specific play space requirements - however the comments are not applicable here or for any of the Core Strategy policies as this forms part of SPG 11: Open Space;
  - less prescription over housing mix, however it is considered the policy provides appropriate flexibility whilst reflecting evidence of future need and the Council's aspirations to rebalance the housing market; and
  - commenting on how realistic it is for individuals to get on the property ladder.
- 2.48 The supporting text has been amended to reflect the 2013 Fylde Coast SHMA analysis in respect of future residents' housing needs and the Council's ambition to rebalance the housing stock. No changes have needed to be made to the policy (although the policy has been re-ordered and aspects have been reworded to provide clarity and better wording. The supporting text on local housing standards acknowledges they will be based on national standards as appropriate, including Lifetime Homes standards to help support the future needs of Blackpool's older population (evidenced in the SHMA); costs associated with conversions have been subject to viability testing appraisals; and that the scope of any new guidance will need to reflect the outcome of the Government's latest consultation on local housing standards.
- 2.49 **CS13: Affordable Housing** - 2 comments have been received on this policy, one requesting reference to specific play space requirements which as previously stated are not applicable

here or for any of the Core Strategy policies as it forms part of SPG 11: Open Space; and the other for the 30% requirement to be subject to viability testing in accordance with NPPF.

- 2.50 The 2014 Viability Study work tested various affordable housing requirements and confirmed that this is a reasonable target for larger developments of 15 units+ except for sites within the Inner Area. It also confirmed a financial contribution from smaller developments creating 3-14 units is reasonable outside the defined Inner Area. Policy CS13 has been amended accordingly so that developments in the inner area are exempt from the affordable housing requirements. It has also been amended to:
- provide more flexibility over dwelling size and tenure mix requirements across the Borough to reflect the 2013 Fylde Coast SHMA analysis, including housing market conditions, and also the Council's recent experience delivering large housing projects;
  - acknowledge the need for the SPD to consider government guidance in asking for affordable housing contributions from smaller developments (there is the possibility that emerging government guidance may introduce minimum thresholds for affordable housing contributions); and
  - specifically acknowledge that an alternative level of affordable housing provision may be negotiated where this has been robustly justified with the submission of a viability appraisal (supported by NPPF).
- 2.51 Furthermore, aspects of the policy have been reworded to provide clarity and better wording.
- 2.52 In terms of the supporting text, this has largely been rewritten to reflect the findings of the 2013 Fylde Coast SHMA affordable housing need assessment, placing emphasis on the need to ensure planning policies will enable sufficient affordable housing delivery to avoid exacerbating affordability issues, and the role of the private rented sector / alternative means of delivery outside the planning system (such as grant funded schemes to improve social housing) in helping to meet Blackpool's affordable housing need. It also reflects the findings of the 2014 Viability Study Report and provides further clarity on the need for a flexible approach to affordable housing delivery in different areas of the Borough to reflect the regeneration priorities and wider housing strategy.
- 2.53 **CS14: Health and Education** - 5 consultees responded to this policy and supporting text. There was general support for the policy. NHS Blackpool requested some small textual changes for clarity. A concern was raised over the absence of reference to a new school required as part of the South Blackpool Housing Growth. Blackpool Council is currently in discussions with Lancashire County Council and Fylde Council regarding future school requirements as a result of new housing growth in South Blackpool in both Blackpool and Fylde. Reference is now made to this in the supporting text to the policy.
- 2.54 **CS15: Gypsy and Travellers, and Travelling Showpeople** - Two comments were received to this policy. Wyre Borough Council (WBC) supported the proposed criteria but suggested this could be expanded in line with CLG guidance by including additional criteria related to flood risk and highway safety. WBC also commented that it is keen to commence discussions with other Lancashire authorities and Lancashire County Council about the feasibility of undertaking a countywide Gypsy and Travellers and Travelling Showpeople accommodation needs assessment. In response to WBC comments the policy has been amended to include additional criteria in line with the identified CLG guidance. With respect to an accommodation needs assessment, Blackpool Fylde and Wyre commissioned a joint Fylde Coast Gypsy, Traveller and Travelling Showpeople accommodation study in October 2013 which is expected to be complete by June 2014.



- 2.55 The second comment received contained inappropriate content that is unsuitable for publication; however, the comment has been considered and no further response is necessary.
- 2.56 **CS16: Blackpool Town Centre** - 6 comments have been received all supporting the proposed boundary change to the town centre. In addition, 6 comments have been received expressing general support for the policy, some of which included detailed comments on cafes, restaurants and pound shops (which the policy aims to address); and one which requests the policy to acknowledge the role of out-of-centre retail to complement the town centre. However this latter comment relates to Policy CS4 which details retail provision across the Borough.
- 2.57 Minor amendments have been made to the supporting text to improve clarity, update the reference to the Town Centre Strategy, which was adopted in 2013, and to update the reference to emerging Wayfinding and Parking strategies.
- 2.58 **CS17: Winter Gardens** - 5 responses were received to this policy. Concerns were raised over the inclusion of hotels and casinos as potential uses for the Winter Gardens. However the policy refers to a wide range of potential uses for which development may be permitted as part of a wider multi purpose complex. There are no proposed changes to this policy as a result of representations received.
- 2.59 **CS18: Central Business District** – 4 consultees responded to this policy and they are generally supportive. Network Rail support a new public transport interchange around a re-modelled railway station and enhanced pedestrian environment. They are keen to be involved at the earliest possible stage to review the plans and discuss any potential issues (e.g. asset protection, access, developer contributions). There are no proposed changes to this policy as a result of representations received.
- 2.60 **CS19: Leisure Quarter (Former Central Station site)** - 4 responses received - 1 in support of redeveloping the site; 1 expressed concern about more hotel development (however high quality accommodation remains an integral part of the tourism offer and will continue to be supported in appropriate locations); 1 requesting the inclusion of measures to encourage cycling (this is incorporated in the supporting SPD - specific reference in this policy is not necessary) and 1 requesting further refinement of policy to ensure new uses complement and do not undermine existing attractions (the policy considers the impact on existing uses by insisting new development integrates with / supports them as appropriate). There are no proposed changes to this policy as a result of representations received.
- 2.61 **CS20: Leisure and Business Tourism** - 9 consultees responded to this policy. Coral Island and Blackpool Pleasure Beach are supportive of the policy. Blackpool Football Club highlight that this policy should recognise the importance of Blackpool Football in contributing to Leisure and Business Tourism. We acknowledge this; however the focus in the Core Strategy is on regenerating the Town Centre and Resort Core.
- 2.62 Bourne Leisure has raised a strong objection to the policy. However, there appears to be a misunderstanding as to which areas of Blackpool this policy applies. This is due to the chapter title being *'Town Centre and Resort Core'*. We recognise that the heading is slightly misleading and this is to be amended. This policy does not relate exclusively to the Resort Core and Town Centre. Part 2 of policy CS20 states *'outside the resort core and away from the seafront, new investment will be focused predominantly on outdoor leisure facilities'*. The supporting text specifically includes reference to Marton Mere Caravan Park.
- 2.63 Bourne Leisure also request the inclusion of a specific policy promoting the enhancement of existing holiday parks, however this is considered to be more appropriate as a Development

Management policy and will be explored as part of the preparation of the Site Allocations and Development Management Policies DPD.

- 2.64 **CS21: Arrival and Movement** – 6 consultees responded to the policy and supporting text to this policy. Comments were largely supportive although there was comment on the need to improve public and active transport provision; to ensure no loss to existing supply of parking and that minimum car parking standards need to be reconsidered. In response to the comments, the general focus of the Core Strategy policy is to provide sufficient high quality parking where it is needed. It is not considered realistic or appropriate to include a specific statement that there will be no loss to existing supply. A review of the parking standards is likely to take place as part of the Site Allocations and Development Management DPD. References to improved parking have been included in policy to address parking shortfall in the town centre and the inner areas.
- 2.65 **Policy CS21 has been merged into CS5** to address the overlap in coverage of these policies and to bring the more strategic wording of CS21 into the more overarching CS5.
- 2.66 Parking measures have been given greater emphasis and explanation and the new merged policy has been restructured to provide greater clarity, address inaccuracies where changes have occurred in the local situation, to express strategic aims rather than list actions.
- 2.67 **CS22 Key Resort Gateways** - 3 representations were received to this policy. Blackpool Pleasure Beach were concerned that the policy did not specifically prohibit any loss to existing car parking provision and that the routes to the south of the town were not considered key resort gateways.
- 2.68 Squires Gate Lane to the south is a strategic route and therefore receives a high priority, especially as it provides the main road access to the employment growth areas to the south. However, it is not considered as a key resort gateway as it does not provide a direct link to the town centre and resort core. No changes have been made to the policy.
- 2.69 **CS23: Promenade Holiday Accommodation** - 3 responses have been received to policy CS23 and supporting text. The key response related to confusion about whether this policy applied to properties outside the Resort Core, whether the holiday accommodation areas can be revisited, and what the policy allows in terms of change of use and whether there is any flexibility to consider viability issues.
- 2.70 In responding to this confusion, **Policy CS23 has been merged with CS24** and simplified, e.g. all defined areas (Promenade and off Promenade) are now referred to as main holiday accommodation areas, individual areas are no longer defined in policy to provide more flexibility for a future SPD review and more clarity is provided over what the policy does / does not allow in terms of change of use. The supporting text has been rewritten to explain the policy approach to managing a reduction in holiday bed spaces and clarifies that the policy applies to some parts of the resort that lie outside the defined Resort Core.
- 2.71 **CS24: Off Promenade Holiday Accommodation** - 6 responses support the policy approach to defining main holiday accommodation areas (although 1 appears to disagree with certain streets being omitted); and 1 response acknowledges the amount of work carried out in considering the alternative options previously discounted. 2 responses were submitted on the policy along with a South Shore area petition (which includes approx. 245 signed letters, letters from the South Shore RBS Branch Manager and Kenricks Agents, and a further 160 signed names), a Coronation Street area petition (which includes approx. 193 names and 3 letters) and 7 letters from the Leopold Grove area.
- 2.72 In summary, the key issues raised show there is a misunderstanding by some people about the policy approach to managing a reduction in holiday accommodation - so the policy

wording and supporting text has been amended to provide more clarity (the Council has also issued additional guidance on its website ([www.blackpool.gov.uk/holidayaccommodation](http://www.blackpool.gov.uk/holidayaccommodation))). Comments regarding the chosen areas or the detailed boundaries of those areas are not a matter for the Core Strategy, as these are defined in the SPD and so any change can only be considered through a formal review of the SPD - the policy no longer identifies the general areas to give more flexibility should we undertake an SPD review.

- 2.73 **CS25: South Blackpool Employment Growth** - 6 consultees responded to this policy / supporting text which were generally supportive. Key comments relate to the NS&I site. The agents acting on behalf of NS&I express concern about identifying the site as a main employment area in South Blackpool and suggest it is more appropriate for mixed use development. The policy is now based on the updated Employment Land Review (2013) which continues to support the inclusion of the NS&I site as a main employment area and considers opportunities for redevelopment (including enabling development which is allowed under Policy CS3). For clarity, enabling development in exceptional circumstances to secure future employment uses where this is robustly justified and would not undermine wider Plan objectives is now also referred to in the supporting text here.
- 2.74 Bourne Leisure considers that any proposal for the NS&I site need to be carefully assessed and designed in order to not detract from the amenity and enjoyments of the adjacent holiday village – although this additional detail is not necessary to include in the supporting text.
- 2.75 LCC urge a more positive planning approach to development at Blackpool Airport, by encouraging opportunities in the vicinity of the airport for a broader mix of uses where these will act as enabling development, to support the airport's ongoing viability and growth. Blackpool Airport Corridor forms part of the Fylde Coast MOU, and the supporting text reflects the positive sentiments in the Duty to Cooperate about joint working to promote sustainable development that sustains the airport as a major economic asset and supports the sub-regional economy. It is not considered that more explicit reference is necessary taking into account that the airport lies outside the Blackpool boundary.
- 2.76 **CS26: South Blackpool Housing Growth** - 6 consultees responded to this policy / supporting text. Comments relate to the effect of the permission at Runnells Farm on the housing requirement figure; the provision of necessary infrastructure on the Fylde/Blackpool boundary with respect to housing development; the avoidance of double counting housing development at Whyndyke by Blackpool and Fylde when considering their housing provision figures; not supporting housing beyond the figure stipulated in the policy; issues related to Flood Zone 2 and drainage issues. Of the comments made, changes to the supporting text to include a reference to Flood Zone 2 with respect to Whyndyke have been made in response to the Environment Agency's comments. Issues relating to drainage are now covered by new Policy CS9 Water Management therefore part 2 of the policy has been deleted to avoid unnecessary repetition.
- 2.77 **CS27: Marton Moss** – 42 consultees commented on the policy with 5 also commenting on the supporting text. 25 respondents were supportive in broad terms of the neighbourhood planning approach set out in the policy and that the existing policy in the adopted Blackpool Local Plan (2006) is too restrictive. Comments were also made on the need to protect the semi rural and distinctive character of the remaining lands at the Moss. Many respondents asked questions regarding the neighbourhood planning process and neighbourhood forum membership. Helpful links on the neighbourhood planning process have been provided in our responses set out in the Responses Report to the Revised Preferred Option Consultation

(Appendix D to this report). A minority of respondents (4) wanted to see additional housing development referring to previous proposals north of Chapel Rd. and at the M55 Hub. Other comments raised related to traffic and drainage issues as well as complaints regarding housing applications that have already received permission at Moss House Rd and Runnells Farm. No changes have been made to this policy as a result of the representations received.

- 2.78 **CS28 South Blackpool Transport and Connectivity** - 4 representations have been received. Concern was raised about the connectivity of the area, though much of this came in the context of transport studies for proposals at the M55 Hub that are no longer going ahead as part of the Core Strategy.
- 2.79 Wyre Council considered it prudent for Blackpool, Fylde and Wyre Councils to work together with Lancashire County Council and the Highways Agency to plan for the effects of proposed development upon the highway network in the South Blackpool area. The supporting text to the policy makes reference to the continued joint working and the requirements of the Duty to Co-operate. The policy has been redrafted to remove overlap with CS5 and to emphasise the importance of transport infrastructure including sustainable transport links to the future growth of this area.