

Officer Report to Committee

Application ref: 21/0517
Ward: TALBOT
Application type: HYBRID

Location: LAND BOUNDED BY CENTRAL DRIVE, NEW BONNY STREET, BONNY STREET,
SEASIDERS WAY AND CHAPEL STREET, BLACKPOOL, FY1 5RL

Proposal:

A) Outline planning application with all matters reserved for:

- Demolition of all buildings on site and;
- Erection of three indoor theme park buildings incorporating ancillary retail/food/drinking establishment uses
- Erection of a building to provide a hotel with ancillary and independent restaurants/drinking establishments
- Creation of new public realm spaces including a public square to be used for live events
- Erection of buildings within the public realm for the sale of food and drink and for use as drinking establishments including provision of way-finding vertical feature
- Provision of new coach station and car park
- Associated infrastructure including access, drainage features and electrical substation(s).

(B) Full planning permission for:

- Former King Edward VII Picture House - external alterations, demolition of single-storey extension to rear, erection of single-storey extension to rear, erection of glazed canopy to side, and for use as a drinking establishment and sale and consumption of food and drink
- King Edward Public House - external alterations, demolition of single-storey extensions to rear, and use as a drinking establishment and the sale and consumption of food and drink and as an apart-hotel.
- Former King Edward Apartments - external alterations, demolition of two-storey extension to rear, erection of 5-storey extension and use as an apart-hotel with ground floor retail and food and/or drinking establishment uses
- Creation of new public realm and service area to rear of buildings
- External alterations to existing substations including partial demolition
- Erection of a 7-level multi-storey car park-and associated infrastructure including new electrical sub-station with access and egress from Seaside Way and Chapel Street
- Demolition of single-storey units fronting Central Drive on either side of the former apartment block
- Creation of access from Central Drive
- Details of vehicular access and egress from Seaside Way and Chapel Street

Recommendation: Approve

Case officer: Susan Parker

Case officer contact: 01253 476228

1.0 BLACKPOOL COUNCIL PLAN 2019-2024

- 1.1 The Council Plan sets out two priorities. The first is ‘the economy: maximising growth and opportunity across Blackpool’, and the second is ‘communities: creating stronger communities and increasing resilience.
- 1.2 This application would accord with the first priority by delivering a major-scale mixed-use development on a site that has long been designated for tourism development, offering substantial regeneration benefits to the immediate area and wider resort.

2.0 SUMMARY OF RECOMMENDATION

- 2.1 The application proposes major-scale, leisure-led development on a site that is allocated in the Development Plan for comprehensive redevelopment to provide a compelling new reason for people to visit Blackpool. Efforts to secure such development on the site have been on-going for over twenty years without success. Whilst the scheme proposed would not fully meet the aspirations of planning policy, it would nevertheless deliver a range of significant benefits to the resort in terms of increased visitor numbers and economic output and prosperity. The development has the potential to improve perceptions of the resort and act as a catalyst for future investment. Subject to conditions, it is considered that the attractions proposed would complement rather than undermine existing elements of the resort offer.
- 2.2 Any scheme of this scale and complexity will present a range of issues and adverse impacts. It is considered that the majority of concerns identified could be adequately mitigated against, and appropriate conditions would be imposed to secure this mitigation. The remaining concerns, including those relating to design, are considered to be insufficient in magnitude to outweigh the benefits that would result from the proposal.
- 2.3 It is recommended that the Habitats Regulations Assessment carried out in respect of the application be adopted by the Council.
- 2.4 It is recommended that planning permission be granted both in full and outline for the relevant elements of the application.
- 2.5 This recommendation is made subject to a suite of conditions that will be prepared in advance of the Committee meeting and shared with Members through the update note.

3.0 INTRODUCTION

- 3.1 This application is before Members because it is a major scheme of borough-wide significance.
- 3.2 A separate application for Listed Building Consent in respect of the works proposed to the former King Edward VII picture house has been submitted under application ref. 21/0527.

4.0 SITE DESCRIPTION

- 4.1 The application relates to the land commonly known as the Blackpool Central site as it was formerly the site of the Blackpool Central railway station. In planning terms the site is known as the Leisure Quarter site. The main area proposed for development is a physically distinct site bound by New Bonny Street to the north, Bonny Street to the west, Chapel Street to the south, and Central Drive to the east. The red edge, however, includes the section of New Bonny Street between the Promenade and Bonny Street, and Brunswick Street (which runs between the Promenade and Bonny Street) as key access routes. It also includes a section of Seaside Way to the south. The total application site is approximately 5.51ha in area.
- 4.2 At present the land is occupied by surface level car parking, a public toilet block, a vacated outdoor market, the law courts which remain in use, the former police station which remains in very limited use, and a cluster of uses at the junction of Chapel Street and Central Drive. This area is referred to as the Heritage Quarter. It includes the locally listed King Edward public house (pub), the Grade II listed former King Edward cinema, and the locally listed former railway apartments building that has retail units at ground floor level.
- 4.3 The site is surrounded by a mix of uses. The Coral Island amusement complex lies to the north with leisure uses and some limited retail fronting the Promenade to the west. The Huntsman building which fronts the Promenade is locally listed as is the Pump and Truncheon/Number 13 pub that fronts onto Bonny Street. Chapel Street generally has a commercial character albeit with some residential uses at upper floor level. The locally listed Stanley Arms pub and former Methodist church on Chapel Street both face the site to the south. There is a designated local centre on Central Drive that lies approximately 160m to the south of the site. This runs into commercial uses to the north that provide a more or less continuous run of commercial character up to the Town Centre boundary. This reflects the central location of the area and the history of holiday attraction and accommodation uses on surrounding streets. Residential accommodation exists at upper floor level in many properties.
- 4.4 Looking more broadly, the site is around 300m to the south of Blackpool Tower which is a Grade I Listed Building. It sits between the Town Centre Conservation Area and the Foxhall Conservation Area. The site falls within the defined boundary of Blackpool Town Centre and within the defined Resort Core.
- 4.5 In terms of constraints, the site does not include any features of ecological interest and is some distance from the nearest designations. There is a band of flood zone 3 land running from the north-western corner of the site to the mid-point of the Chapel Street frontage. The site falls within the Blackpool Airport and Warton Aerodrome safeguarding zones. No other site-specific constraints are identified.

5.0 DETAILS OF PROPOSAL

- 5.1 The application is a hybrid meaning that it seeks planning permission both in full and outline for different areas of the site. The scheme as a whole is referred to as 'Blackpool Central'.
- 5.2 The area subject to the application for full planning permission is to the south-east of the site. This element proposes:
- Erection of a 7-level multi-storey car park of some 34,000sqm floor space. The car park would have four stair cores and associated infrastructure including new electrical sub-

station with access and egress from Seaside Way and Chapel Street. It would provide some 1,300 parking spaces along with 52 motorcycle spaces and storage for 64 bicycles. The car park would include 13 electric vehicle charging points. It is intended that the car park would be operated by Blackpool Council on completion. Access to the car park would be barrier controlled. Two stair cores would give access to the proposed Heritage Quarter with a third giving access to the north and the fourth to the west.

The core to the north would be finished in gold anodised aluminium cladding with silver panels. The cores to the west and east would be finished in silver anodised aluminium cladding with gold flashes. The main body of the building would also be finished in silver anodised aluminium panels but these would be perforated with two levels of perforation proposed. The elevations would be made up of rectangular panels in a grid formation but this pattern would be broken up by diagonal gaps in the cladding. On the eastern and western elevations, these diagonals would run from first floor to roof level. To the south they would terminate two floors below roof level and on the northern elevation only one diagonal is proposed to turn the north-eastern corner. The two diagonals would then be cross-cut by diagonals marking the transitions between the two varieties of perforation. The gold anodised aluminium would also be used around the vehicle access/egress points to visually highlight these features.

- External alterations and use of the former King Edward VII Picture House as a drinking establishment and for the sale and consumption of food and drink. The external alterations would include the demolition of a non-original single-storey extension to the rear and the erection of a new single-storey rear extension. A glazed canopy would be erected to the side to form a covered walkway in from Central Drive to the space to be created to the rear. It is envisaged that this building would be used as a food and drink hub with numerous kitchen outlets surrounding a central, communal seating area at ground floor level. Additional seating areas would be created at first floor and to a limited extent at second floor around a central void, and externally between the Heritage Corner and multi-storey car park. The application seeks to retain and/or reinstate the original features of the building wherever possible and includes the removal of the non-original concrete floor to re-establish the original hall space.
- External alterations and use of the King Edward VII Public House as a drinking establishment at ground floor level; as a café/bar at ground and first floor level; and as an apart-hotel at first and second floor level. This accommodation would provide ten studios ranging from 12sqm to 55sqm in area. Each would offer en-suite facilities and provide for self-catering. The external alterations would include the replacement of the existing dormer on the corner and the installation of a new shopfront facing onto Chapel Street along with the demolition of single-storey extensions to rear.
- External alterations including a five-storey extension and use of the King Edward VII apartment building as retail and food/drink premises at ground floor level with an apart-hotel at upper floor level. A two-storey extension would be demolished to the rear. The existing roof would be removed and a fifth storey created set back from the building edges. The five-storey extension would be a substantial addition to the northern end of the building and the section linking on to the existing building would be recessed slightly to mark the transition. The new section of building would largely continue the pattern and rhythm of fenestration but the format of the glazing would differ and the architectural detailing on the original building would not be replicated. The ground floor would provide two retail units, a reception/foyer for the apart-hotel linked into a restaurant/bar, and a unit to be used for retail or as a restaurant or bar. The upper floors would provide 37 studios ranging in size from 18sqm to 62sqm.

- Creation of new public realm and service area to the rear of the buildings, alteration to the existing substations, demolition of the single storey units fronting Central Drive and creation of access from Central Drive.

5.3 Outline planning permission is sought in relation to the northern, western and south-western parts of the site. This element proposes:

- Demolition of all buildings on site;
- Erection of three indoor theme park buildings incorporating ancillary retail/food/drinking establishment uses along with a flying theatre and adventures sports hub within the first indoor theme park. This would provide just under 23,000sqm of leisure floor space in buildings of up to 24m height. One theme park would include parking for around 400 vehicles at ground and first floor level and another would provide a coach station with 8 bus/coach parking spaces at ground floor level. The leisure and ancillary retail, food and beverage offer would be at upper floor level in the buildings.
- Erection of a building to provide a hotel with ancillary and independent restaurants/drinking establishments. This building would have a floor space of around 5,300sqm and would provide up to 200 guest bedrooms. It would be 6 storeys in height up to a maximum of 25m. The food and drink element would account for up to 1,920sqm of the space.
- Creation of new public realm spaces including a public square to be used for live events. It is envisaged that this space would be some 6,600sqm in area. Other public realm areas amounting to around 8,400sqm would be created within the development as a whole and these would provide circulation space around the buildings.
- At the north-eastern corner of the site, at the junction of Central Drive and New Bonny Street, a 234sqm building is proposed within the public realm for the sale of food and drink and for use as drinking establishments. The main building would be roughly 6m in height but a way-finding vertical feature of up to 25m is also proposed to reflect the prominent position of this corner.
- Works to the vehicular access into the site from Seaside Way including the roundabout approach and the provision of a link road to Chapel Street.

5.4 The application has been supported by:

- Environmental Statement comprising
 - Non-technical summary
 - Part 1 – general information and summary of each issue
 - Part 2 – technical papers on each issue
 - Ground conditions
 - Traffic and transportation
 - Drainage and flood risk
 - Townscape and visual impact
 - Ecology and nature conservation
 - Socio-economic considerations
 - Noise and vibration

- Air quality, dust and odour
 - Built and cultural heritage
 - Waste
 - Climate change
 - Human health
- Planning statement
 - Design and access statement
 - Hotel demand assessment report
 - Leisure market and demand study
 - Retail compliance statement
 - Microclimate assessment
 - Bat survey

6.0 RELEVANT PLANNING HISTORY

6.1 Given the size and nature of the site it has a very extensive planning history, the majority of which is not relevant to this proposal. The following applications are, however, of greatest significance and note:

6.2 01/0885 – outline application withdrawn for the erection of a 1,000 bedroom hotel; 20,000sqm of retail/leisure floor space; a casino area; conference/exhibition space; a multi-purpose theatre of 3,000 seats; 2,200 parking spaces; and public/circulation space.

6.3 06/0661 – outline application withdrawn for a comprehensive mixed use development comprising conference and exhibition facility, casinos, hotels, leisure, offices, food and drink and retail, nightclubs and amusement arcades with associated car, motorcycle and cycle parking, servicing, access and associated highway works and public realm improvements.

6.4 20/0321 – pre-application advice sought in respect of the current proposal.

6.5 21/0163 – request for a formal scoping opinion in respect of the required Environmental Statement.

7.0 RELEVANT PLANNING POLICY

7.1 National Planning Policy Framework (NPPF)

7.1.1 The latest iteration of the National Planning Policy Framework (NPPF) was adopted in July 2021. It sets out a presumption in favour of sustainable development. The following sections are most relevant to this application:

- Section 6 – Building a strong, competitive economy
- Section 7 – Ensuring the vitality of town centres
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

7.2 National Planning Practice Guidance (NPPG)

7.2.1 The National Planning Practice Guidance (NPPG) expands upon and offers clarity on the points of policy set out in the NPPF.

7.3 Blackpool Local Plan Part 1: Core Strategy 2012-2027 (hereafter referred to as the Core Strategy)

7.3.1 The Core Strategy was adopted in January 2016. The following policies are most relevant to this application:

- CS1: Strategic Location of Development
- CS4: Retail and Other Town Centre Uses
- CS5: Connectivity
- CS6: Green Infrastructure
- CS7: Quality of Design
- CS8: Heritage
- CS9: Water Management
- CS10: Sustainable Design and Renewable and Low Carbon Energy
- CS11: Planning Obligations
- CS12: Sustainable Neighbourhoods
- CS17: Blackpool Town Centre
- CS20: Leisure Quarter (former Central Station site)
- CS21: Leisure and Business Tourism
- CS22: Key Resort Gateways

7.3.2 For the convenience of Members, and as the policy specifically relates to the application site, Policy CS20 is set out below:

Policy CS20: Leisure Quarter

1. *Comprehensive redevelopment of the entire site will be promoted and encouraged for major leisure development of national significance; where the cumulative impact of a single or group of leisure uses will provide a compelling new reason to visit Blackpool.*
2. *The development must:*
 - a. *Demonstrate the highest design quality, through creative architecture, urban design and public realm that creates a landmark attraction which responds to Blackpool's historic townscape and character*
 - b. *Integrate with and support, whilst not undermining existing resort core uses and attractions*
 - c. *Provide ease of access, good vehicular and public transport connections, quality arrival points and adequate parking facilities (to serve the development and town centre)*
 - d. *Improve pedestrian permeability by creating strong active connections through the site and between the site and the town centre, seafront, central corridor and surrounding resort neighbourhoods*

- e. *Promote sustainable development through design, access, energy conservation and operational management.*
3. *Complementary leisure uses, hotel development, ancillary retail, parking and servicing that would add value and support major leisure development will be permitted.*
4. *Development proposals may be phased but must not be piecemeal in approach. If all reasonable measures have been taken to redevelop the entire site, and this is not possible, the retention and improvement of existing buildings will be allowed providing the scheme meets the development objectives set out in the supporting Development Brief [set out below under 7.6.1].*

7.4 Blackpool Local Plan 2001-2016 (hereafter referred to as the Local Plan or saved policies)

7.4.1 The Blackpool Local Plan was adopted in June 2006. A number of policies in the Local Plan have now been superseded by policies in the Core Strategy but others have been saved until the Local Plan Part 2: Site Allocations and Development Management Policies has been produced. The following saved policies are most relevant to this application:

- RR1: Visitor Attractions
- RR4: Amusement Arcades and Funfairs
- RR11: Central Promenade and Seafront
- LQ1: Lifting the Quality of Design
- LQ2: Site Context
- LQ3: Layout of Streets and Spaces
- LQ4: Building Design
- LQ5: Public Realm Design
- LQ6: Landscape and Biodiversity
- LQ7: Strategic Views
- LQ9: Listed Buildings
- LQ10: Conservation Areas
- LQ11: Shopfronts
- BH3: Residential Amenity
- BH4: Public Health and Safety
- BH17: Restaurants, Cafes, Public Houses and Hot-Food Take-Aways
- NE4: SSSIs
- NE5: Other Sites of Nature Conservation Value
- NE6: Protected Species
- NE7: Site and Features of Landscape, Nature Conservation and Environmental Value
- NE9: The Coast and Foreshore
- AS1: General Development Requirements (transport)
- AS2: New Development with Significant Transport Implications
- AS5: Traffic Management
- AS7: Aerodrome Safeguarding

7.5 Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (hereafter referred to as Part 2 or emerging policies)

7.5.1 The Blackpool Local Plan Part 2 has now been submitted for examination in public with the examination expected to be held later this year. At this point in time, the weight to be attached to various policies depends upon the extent of unresolved objections and degree of

consistency with the NPPF. The following draft policies in Part 2 are most relevant to this application:

- DM10: Promenade and Seafront
- DM15: Threshold for Impact Assessment
- DM17: Design Principles
- DM18: High Speed Broadband for New Development
- DM19: Strategic Views
- DM21: Landscaping
- DM22: Shopfronts
- DM25: Public Art
- DM26: Listed Buildings
- DM27: Conservation Areas
- DM28: Non-Designated Heritage Assets
- DM30: Archaeology
- DM31: Surface Water Management
- DM33: Coast and Foreshore
- DM35: Biodiversity
- DM36: Controlling Pollution and Contamination
- DM41: Transport Requirements for New Development
- DM42: Aerodrome Safeguarding

7.6 Other Relevant Policy Guidance

7.6.1 Leisure Quarter Development Brief (March 2011) seeks to guide the development of the application site. It is a key document that expands upon the expectations set out in Policy CS20 of the Core Strategy and guides the implementation of that policy. The Supplementary Planning Document (SPD) identifies eight objectives:

- Provide unique leisure attractions of national significance, widening the resort offer to attract new audiences and creating compelling new reasons to visit Blackpool year-round.
- Provide development of sufficient scale, composition and attraction to create the critical mass to assist with wider resort regeneration.
- Underpin a year-round economy promoting sustainable local employment opportunities.
- Ensure excellence in design quality, delivering a distinctive high quality experience for visitors through creative architecture and urban design that responds to Blackpool's historic townscape and character.
- Create a new welcome experience which presents a spectacular sense of arrival for visitors at Blackpool's key gateway.
- Improve permeability by creating strong active connections through the site and between the site and the town centre, seafront, central corridor and surrounding resort neighbourhoods, enhancing vitality and viability during the day and evening.
- Provide a suitable level of convenient town centre car parking in addition to car and coach parking requirements for the development.
- Promote sustainable development through design, access, energy conservation and operational management.

- 7.6.2 Blackpool Council declared a Climate Change Emergency in June 2019 and is committed to ensuring that approaches to planning decisions are in line with a shift to zero carbon by 2030.
- 7.6.3 Blackpool Council adopted the Blackpool Green and Blue Infrastructure (GBI) Strategy in 2019. The GBI Strategy sets out six objectives for Blackpool in terms of green infrastructure:
- Protect and Enhance GBI i.e. protecting the best and enhancing the rest.
 - Create and Restore GBI i.e. greening the grey and creating new GBI in areas where it is most needed.
 - Connect and Link GBI i.e. making the links, improving connectivity and accessibility of GBI.
 - Promote GBI i.e. changing behaviour, promoting the benefits of GBI and encouraging greater uptake of outdoor activity and volunteering.
- 7.6.4 The National Model Design Code (July 2021) provides guidance to promote successful design and expands on the ten characteristics of good design set out in the National Design Guide.
- 7.6.5 The National Design Guide (January 2021) recognises the importance of good design and identifies the ten characteristics that make up good design to achieve high-quality places and buildings. The guide articulates that a well-designed place is made up of its character, its contribution to a sense of community, and its ability to address the environmental issues affecting climate.
- 7.6.6 Town Centre Strategy (2013) outlines a vision for the town centre, identifying opportunities for change and priorities for improvement to support Blackpool as the thriving heart of Britain's favourite resort, offering an all-year-round high-quality shopping, leisure, cultural and entertainment destination. The strategy identifies the application site as having potential to deliver a new major leisure development as iconic as Blackpool Tower and the Winter Gardens.
- 7.6.7 Blackpool Retail, Leisure and Hotel Study (2018) assesses the performance of the established centres in the borough since 2011 and provides recommendations for improvements. It identifies trends in the leisure, food and drink sectors. Whilst hotel provision was considered sufficient to meet needs, the study advocated a focus on quality and acknowledged that the delivery of the Leisure Quarter site could create a future requirement for additional provision. The development of the Leisure Quarter is noted as having potential to strengthen Blackpool's offer and attract visitors.
- 7.6.8 Retail Topic Paper (2020) identifies the Leisure Quarter as one of three strategic sites within the Town Centre with the potential to deliver significant retail development over the plan period. The paper concludes that there is no requirement for additional land for comparison retail to be allocated in Local Plan Part 2.
- 7.6.9 Town Centre Car Parking Strategy report to Executive, 25 February 2019, summarised current and future demand for car parking in the town centre and identified options to address the anticipated requirements.

7.7 Weight to be attached to relevant planning policies and guidance

- 7.7.1 Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990 require applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 219 of the

National Planning Policy Framework makes it clear that existing policies of the Development Plan should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Instead, due weight should be given to them according to their degree of consistency with the Framework.

- 7.7.2 With regard to emerging policies, weight can be given according to the stage of preparation of the plan; the extent to which there are unresolved objections; and the degree of consistency with the National Planning Policy Framework. There are no substantive objections to the emerging policies insofar as they relate to this proposal. As the plan has been submitted for examination and as it is considered to be consistent with the National Planning Policy Framework, it is considered that some weight can be attached to the emerging policies.

8.0 CONSULTATION RESPONSES

- 8.1 **Environment Agency:** no objection subject to the imposition of conditions.

8.1.1 The information submitted considers flood risk and the impact of climate change and identifies general type of flood risk mitigation to be implemented. The site is partly within Flood Zone 3 in relation to tidal flooding and the proposal comprises 'more vulnerable' and 'less vulnerable' uses. The applicant must provide further information to ensure that there would be no unacceptable risk of tidal flooding. The submitted information states that the scheme would provide a greater volume of flood storage than existing and that the current published flood map is not an accurate representation of the situation. Detailed flood modelling is to be undertaken at (alongside) reserved matters stage. Sufficient detail will be required to demonstrate that this modelling is accurate and that latest climate change allowances have been used. The results of this model should be used to determine finished floor levels and/or mitigation. It must be demonstrated how flood risk would be managed. The full volume of required flood storage must be demonstrated and it must be shown that flood water could drain without increasing risk off-site. The proposal must proceed in strict accordance with the Flood Risk Assessment ES Parameters Plan and the mitigation measures. Any proposed changes will require a revised Flood Risk Assessment. An appropriately worded condition is provided. Government guidance in relation to flood resistant construction and flood resilience should be followed.

8.1.2 The site is allocated in the Core Strategy for leisure, hotel, retail and parking. The sequential test does not need to be applied for individual developments on site allocated through the sequential test. Nevertheless, it is for the local planning authority to ensure that the requirements of the sequential and exceptions tests are satisfactorily met.

8.1.3 The Environment Agency would not normally comment on the adequacy of flood emergency response procedures. Safe access and evacuation during a flood must be considered and adequate flood warnings must be available to people using the development. Emergency planning and rescue implications should be considered. It is recommended that the local planning authority consults with emergency planners and the emergency services.

8.1.4 The information submitted considers the impact on controlled waters from land contamination. The previous use of the site as a railway station poses a high risk of contamination that could be mobilised during construction. The site is located on a Secondary B aquifer and is in close proximity to the Irish Sea. The information submitted identifies that contamination is minimal and so no comments on the investigation are offered. In respect of undetected contamination, there is potential for this to be greater

than described. It is agreed, however, that impact would be limited given groundwater conditions and so the Enabling Works Strategy is acceptable. Further information is required in relation to the management of risk to controlled waters but it would be unreasonable to ask for this prior to determination. Appropriate conditions are recommended. If these conditions are not imposed the Environment Agency would have to raise an objection against the application.

- 8.1.5 Impact on water quality is considered in the information submitted. Any increase in surface water entering the combined/foul sewer should be avoided, and where possible existing connections removed from the network as part of the new drainage scheme, to reduce impacts on the wastewater treatment system and receiving bathing waters. The storm overflows along the promenade have been modelled and shown to impact water quality, although recent investment has reduced this impact. Any reduction in the volume of water entering this network would be positive. Small surface-water drains run along the promenade and are heavily contaminated. Any increase in surface-water discharging through them has the potential to impact on bathing water quality and so should be avoided. An appropriate condition is provided.
- 8.1.6 The planning system should minimise impacts on and provide net gains for biodiversity. Opportunities for enhancement should be identified and incorporated within the development. The use of sustainable drainage systems (SUDS) is recommended for water quality but also to provide green infrastructure and biodiversity net gain.
- 8.1.7 Excavated materials must be dealt with in accordance with the Development Industry Code of Practice as it relates to waste. Waste materials can be re-used or transferred subject to these provisions. All contaminated materials must be dealt with appropriately and the Environment Agency should be contacted for advice. Reference to relevant guidance is provided. The applicant may need to register as a hazardous waste producer depending upon amount extracted and may require an Environmental Permit. The applicant should contact the Environment Agency for guidance.
- 8.1.8 The Environment Agency should be re-consulted on any future reserved matters or discharge of condition applications. The Environment Agency offers a pre-application advice service that the applicant may wish to take advantage of.
- 8.2 **United Utilities:**
 - 8.2.1 There are existing water mains within the site boundary and the proposed layout must take account of this or a diversion must be agreed at the applicant's expense. The applicant should contact United Utilities at the earliest opportunity. Foul and surface water should be drained separately with surface water drained in the most sustainable way. Two appropriate conditions are recommended. The local planning authority should consult with the Environment Agency and Lead Local Flood Authorities as appropriate in respect of rates of discharge. Any wastewater assets proposed for United Utilities adoption must be up to United Utilities standards and early consultation is recommended. Drainage should inform site levels and layout. Appropriate management of the surface water drainage scheme will be required and an appropriate condition is recommended. If the applicant intends to obtain a water supply from United Utilities, early consultation is recommended. A water main crosses the site and unrestricted access must be maintained. The applicant must comply with United Utilities conditions and United Utilities cover must not be compromised. There should be no additional load bearing capacity on the main without prior agreement. The developer must demonstrate the relationship between the development and United Utilities

assets. A public sewer crosses the site and a 3m wide access strip on either side must be maintained or the sewer diverted at applicant expense. United Utilities cover must not be compromised, careful consideration should be given to planting and early consultation is recommended. If a sewer is discovered during construction, a Building Control body should be consulted.

8.3 National Highways (formerly Highways England): No objection.

This development would not be expected to result in a severe traffic impact or material reduction in safety of the strategic road network (M55). The majority of those visiting the site from outside Blackpool would already be visiting the resort, and any additional trips the development would generate would be outside of the weekday AM and PM peak periods.

8.4 Natural England:

8.4.1 Initial response: further information is required to determine impacts on designated sites.

8.4.2 The proposal could affect the Liverpool Bay Special Protection Area, the Ribble and Alt Estuaries Special Protection Area and wetlands of international importance (RAMSAR), and the Ribble Estuary Site of Special Scientific Interest (SSSI) through recreational disturbance. A Habitats Regulations Assessment which includes an assessment of recreational disturbance impacts is required.

8.4.3 The site is within 0.6km of the Liverpool Bay Special Protection Area and within 4km of the Ribble and Alt Estuaries Special Protection Area and RAMSAR. The local planning authority as a competent authority must have regard to potential impact in relation to the conservation objectives for each site. Despite the proximity to the European sites, no Habitats Regulations Assessment has been provided to comply with the relevant regulations. The proposal is not directly connected with or necessary for the management of the sites, and so it should be determined if it would likely have a significant effect. There may be insufficient information in the application to enable this. The development proposes up to 260 hotel rooms which would likely result in increased recreational pressure at nearby coastal locations and surrounding functionally linked land. Recreational disturbance therefore needs to be taken to the appropriate assessment stage of the Habitats Regulations Assessment and applicable mitigation secured if required. The site is within 4km of the Ribble Estuary Site of Special Scientific Interest. Insufficient information has been provided to demonstrate that the development would not damage or destroy its interest features. Natural England has produced standing advice in respect of protected species. Natural England must be notified if the local planning authority intends to approve this application contrary to the advice provided.

8.4.4 Final response: following the submission of a Habitats Regulations Assessment, Natural England concurs with the conclusion that the proposal would not result in adverse effects on the protected sites subject to mitigation. As such, Natural England has no objection to the grant of planning permission subject to the following mitigation measures being secured through condition:

- Agreement of and adherence to a Construction Environmental Method Statement to cover:
 - Details of dust suppression measures
 - Details of provision of spill kits and best-practice pollution prevention
 - General best-practice working methodologies

- Provision of visitor information packs to each hotel/apart-hotel room
 - Information to include alternative opportunities for recreation in the area to minimise the likelihood of visitors dispersing to the protected sites
 - The protection afforded to the sites and their qualifying features
 - Details of sustainable use of the coastline including the Countryside Code and best-practice measures for sustainable recreation
- Installation of interpretation panels in the hotel foyers
 - Information to be as set out above

8.5 **Historic England:** no objection. Pre-application advice was issued in respect of this proposal and Historic England remain of the view that the scheme would have a limited impact on the significance of the surrounding heritage assets.

8.5.1 The proposals are supported. The site was formerly occupied by the Blackpool Central railway station which included 14 platforms and a mix of station buildings and sheds. The station closed in 1964 and was demolished in 1965. The site lies between the Town Centre and Foxhall Conservation Areas and is surrounded by listed and locally listed buildings. There are listed and locally listed buildings in the south-east corner of the site. The site is screened from the Promenade and from the Town Centre core and central listed buildings by intervening townscape.

8.5.2 Blackpool Tower is visible from the site. The open nature of the site currently provides a good vantage point. The scheme would create a new landmark development to bring regeneration. A comprehensive visual impact assessment informed by heritage considerations has been submitted along with wire frame drawings and computer generated CGIs. These demonstrate that the development would have a negligible impact on the Winter Gardens, Grand Theatre or Conservation Area. The development would impact on views of the Tower. However, the current sense of openness is artificial and results from the site's use as an open car park. Historically it would have contained up-standing, multi-level structures that would have limited views. The scale of change would be far more appreciable from the Tower. However, the scheme would not be out-of-keeping with the context and would not affect the way in which the Tower is appreciated.

8.5.3 The proposals include the creation of a Heritage Quarter. The works would include partial removal of a non-original concrete floor which is an unsympathetic addition. It would facilitate the creation of a larger atrium, re-establishing the sense of openness to the historic ceiling. A non-original extension would also be removed to improve permeability. The proposed multi-storey car park would be a blocky building but it is recognised that the nature of the building reduces flexibility in design. Nevertheless, the building has been kept as low as possible and this is welcomed to prevent it over-dominating the Heritage Quarter. The building would be clad in patterned aluminium with gold areas to reference the 'Golden Mile'. The development would have a limited impact on the significance of heritage assets within Historic England's remit.

8.5.4 Great weight should be given to the conservation of heritage assets. Any harm to an asset must be clearly and convincingly justified. Where a proposal would lead to less than substantial harm, the harm must be weighed against the benefits that would result. Opportunities for new developments to enhance or better reveal the significance of Conservation Areas and assets should be supported. Heritage has been appropriately considered as part of this scheme and this is welcomed. The proposal would undoubtedly

have some impact but this would be neutral in relation to the Tower and positive in relation to the cinema. The application meets the requirements of paragraphs 193, 194, 196 and 200 of the National Planning Policy Framework. In determining the application, due regard must be had to the provisions of the Listed Buildings and Conservation Areas Act.

- 8.6 **Marine Management Organisation:** public authorities making decisions capable of affecting the United Kingdom marine area must have due regard to the relevant marine plan and the United Kingdom Marine Policy Statement as material planning considerations. The Marine Management Organisation has produced relevant guidance that is available online. Activities taking place below the mean high water spring mark may require a marine licence. Any departure from a relevant marine plan must be justified.
- 8.7 **Theatres Trust:** detailed comments in respect of the full element of this proposal have been submitted in relation to Listed Building Consent application ref. 21/0527. We are supportive of the change of use and have no objections to the external alterations. The wider development is supported in principle because the enhancement of Blackpool as a destination and increased visitor numbers could positively impact the attractions including theatres. No negative impacts on the setting of nearby theatres as heritage assets are anticipated.
- 8.8 **Cinema Trust Association:** the submitted Heritage Statement is well-written. Overall the broad aims of the application and the proposed use of the building as an artisan food court is supported. The commitment to restore the superb Arts and Crafts façade and the surviving interior features, including the foyer and pay-box is welcomed. Concern is raised over the impact of the new roof-lights on the historic curved ceiling. The section drawing shows large new skylights in the main roof but the size of openings in the curved ceiling is unclear. Any openings in the curved auditorium ceiling should be small. The existing small, square openings should either be re-used or only slightly enlarged. The proposed balustrade around the new void is extremely plain and a more detailed design would enhance the interior.
- 8.9 **Greater Manchester Ecology Unit (GMEU):**
- 8.9.1 The site has very limited nature conservation value as it is dominated by hard surfaces and in a busy, central location. It is within 100m of the shoreline which has some ecological value and within 1km of the Liverpool Bay Special Protection Area (SPA). However, given the current character and location of the site, the development would not be expected to have any likely significant effects on the Special Protection Area. As such no objection is raised. New bat roosting opportunities (10no. bat boxes) should be provided to provide biodiversity net gain. A Construction Environmental Method Statement should be conditioned and followed to include details of dust suppression and the prevention of water pollution. Demolition should not take place during bird nesting season unless nesting birds have been demonstrated to be absent. New landscaping to include tree and shrub planting and a sustainable urban drainage system should be provided to enhance biodiversity. Landscaping should be conditioned.
- 8.9.2 The 'shadow' Habitats Regulations Assessment produced by the applicant has been considered and its conclusions are agreed. It is recommended that the Habitats Regulations Assessment can be adopted by the Council in fulfilment of its obligation under the terms of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Discussions between the applicant and Natural England suggest that the latter's concern is focused more on the activities of visitors to the site rather than increase in numbers. The

conclusions of the Habitats Regulations Assessment would require the imposition of two conditions. The first would require the provision of interpretation boards and information packs, and the second would require a Construction Environmental Management Plan for each phase of development.

8.10 Lancashire County Council Archaeological Advice Service: four areas of potential are identified: (1) the 'heritage corner', (2) the car park to the east of Seaside Way (former aerated water manufactory), (3) the main car park (remains of railway) and (4) the car park north of the police station (former C19th housing). In respect of area (1), detailed comments have been provided in relation to application ref. 21/0527. An appropriate condition is recommended. Area 2 lies outside of the proposed development and appears to have been included in error. Areas 3 and 4 have some limited local significance for Blackpool and would merit some post-determination archaeological investigation. An appropriate condition is recommended.

8.11 Lancashire Constabulary:

8.11.1 A development of this size has potential to increase demand on local policing due to its location and mix of retail, drinking and live events. The applicant should contact the police to discuss security features. All buildings should comply with Secure by Design specifications. There should be good levels of monitored CCTV and lighting and the building should be fitted with security rated products such as windows, doors and a monitored intruder attack alarm. The development would create a new hub of Publicly Accessible Locations which presents a terrorism threat. There is no intelligence to suggest an increased threat in this location, but potential risk should be considered and mitigated against. This also applies to construction phases. It is encouraging that vehicle restriction is planned and this should be physically enforced and designed into the scheme. The applicant should contact the police at the earliest opportunity to discuss risk and threat in relation to counter terrorism.

8.11.2 The car park surface must not provide a 'perfect playground' environment. Safer Parking Scheme standards should be met. The scheme should be covered by appropriate high definition digital colour CCTV including access cores and doors. This should be sited, designed and signed accordingly. Floors of the car park should be closed during quieter times when the provision is not required. Anti-climb weldmesh to be installed at upper level to reduce risk of suicide attempts. A 2.5m high barrier is sufficient to deter climbing where there are no other footholds. Internal walls and ceilings should be light in colour to reflect light and prevent an intimidating feel. External doors to be appropriately illuminated. Anti-graffiti coatings to be used as appropriate. Directional floor markings within the car park to be easily visible and clear. Signage to be minimal, clear and concise. The area between the car park and Heritage Quarter to be defensible and secure. The holiday accommodation should not be publicly accessible by non-residents. Refuse storage to be well lit and secure and covered by CCTV. Appropriate fire and security alarms to be provided. Stairways should not be accessible to the general public but should work on a 'fob' system. Windows and doors to meet appropriate standards. Appropriate security to be applied to areas where valuable items are stored.

8.12 Lead Local Flood Authority: a total reduction of 70% from existing run-off from the site is proposed down to 340 litres per second. A very detailed flood risk assessment has been provided. No objection is raised to the proposal and our standard conditions should be imposed although most of the existing information provided will meet or exceed the condition requirements. The utilities companies and most interested parties have already been contacted meaning that they have the information they require. All drainage issues

have been covered in great detail. In response to the detailed information submitted in respect of the full element, the model works based on the assumptions used and these are considered to be reasonable. As such the drainage system proposed is acceptable.

8.13 Built Heritage Manager:

- 8.13.1 No objection to the outline element of the proposal. Detailed comments in relation to the proposed works to the King Edward VII Picture House have been made in respect of application ref. 21/0527. No objection to the proposals for the King Edward VII Public House. The original windows should be retained and repaired if necessary. Original internal features such as tiles, fireplaces, plasterwork and joinery should be retained wherever possible and this should be covered by condition. No objection to the proposals for the King Edward VII apartments although further information on the proposed shop-fronts should be provided. Views of the Tower and the settings of various heritage assets would be affected. However, the current setting is poor and so, whilst the proposal would create a very modern setting, in view of the public benefits, the re-use of historic buildings and the revitalisation of a site on the edge of the Town Centre Conservation Area, no objection against the overall scheme is raised. Officer response: further details of the shopfronts have been provided and could be conditioned.
- 8.13.2 The submitted Environmental Statement (ES) meets the requirements identified in the Council's issued scoping opinion. Archaeological potential for the site is very low but some domestic housing remains may survive so a watching brief should be conditioned as mitigation. It is noted that operational lighting is not anticipated to be a problem but experience lighting will require careful consideration to reduce potential impact. The identified key receptors are in the immediate vicinity of the site and did not include properties in the Foxhall Conservation Area. Any lighting scheme design should consider potential impact on this area. The information provided was agreed at scoping stage along with the heritage receptor plan and the proposed viewpoint locations. It is agreed that rendered CGIs are not required at this stage but should be secured through condition for subsequent stages.
- 8.13.3 Within Part 2 of the Environmental Statement, technical paper 4 considers Townscape Visual Impact (TVIA) and technical paper 9 considers heritage impact. Both accord with the requirements of the Council's scoping opinion and are satisfactory. As above, the lighting impact assessment does not consider the streets to the south of Chapel Street in the Foxhall Conservation Area. However, it is assumed that the impact on these streets will be less and that public benefit would therefore outweigh harm as required by paragraph 196 of the National Planning Policy Framework. This is acceptable subject to a condition requiring further consideration. It is accepted that the detailed mitigation measures will be appropriately covered. No objection is raised to the outline elements of the application. Demolition would remove structures that have a defined negative impact on the setting of heritage assets. Any harm arising from the demolition would be significantly outweighed by the conservation and enhancement of heritage assets.
- 8.13.4 Views of the Tower and the setting of nearby assets would be affected. The proposed use would be appropriate to the history of the site. Para 196 of the National Planning Policy Framework requires proposals leading to less than substantial harm to be weighed against the public benefits. The current setting is poor and the proposal, though modern, would cause less than substantial harm. The public benefit of restoring and bringing the Heritage Quarter buildings back into active, economic use is sufficient for no heritage objection to be raised. The multi-storey car park would have a major impact on the setting of these buildings

but the public benefit in terms of a secure future for the assets would outweigh the harm. It is accepted that construction phase impacts would be temporary and acceptable subject to mitigation. Operational impacts would be long-term and appropriate mitigation, such as the use of attractive materials on the multi-storey car park and other buildings, would be required to secure less than substantial harm.

- 8.13.5 Views of the Tower would be blocked from some views from Chapel Street. The setting and views of the Tower have changed over time and glimpsed views would be available within the site and from the multi-storey car park roof. The Tower would remain the dominant landmark and key views would be unaffected. It is agreed that the impact would be neutral. Again the public benefits of the scheme would outweigh any harm.
- 8.13.6 The repair and redevelopment of the King Edward VII public house would have a beneficial impact on its value and is welcomed and would accord with Policy CS8 of the Core Strategy. The King Edward VII apartment building is the last remaining structure from the Central Station complex. Its retention is also welcomed. The location and fixing of all façade lighting on the Heritage Quarter should be agreed through condition. The former King Edward VII picture house has been empty for many years and is in a dilapidated state. Its repair, alteration and re-use is welcomed and acceptable.
- 8.14 **Blackpool Civic Trust:** this major proposal is welcomed and in principle the Civic Trust is in favour. The developer should note our interest and consult us through the planning process at appropriate stages.
- 8.15 **Environmental Protection (amenity):** the standard noise condition should be imposed.
- 8.16 **Environmental Protection (environmental quality):** the standard land contamination condition should be imposed.
- 8.17 **Community Safety Officer:** internal and external CCTV should be provided on site and linked through to the Council CCTV room for live-time monitoring. The multi-storey car park would require an access control system that prevents tail-gating and pedestrian access.
- 8.18 **Head of Transportation:**
- 8.18.1 The proposal as a whole will take several years to design, evaluate and implement. The delivery of the development must leave the transportation network legible, effective and resilient should there be any delays or amendments, or in the event that elements do not come forward. The construction of the multi-storey car park would sever northward traffic with pedestrians diverting to Chapel Street and vehicles diverting at Bloomfield Road until a new link road onto Chapel Street is provided as part of phase 3. The Supplementary Planning Document for the site sets out what is expected from any application. The following have not been dealt with as part of this application and will need to be addressed:
- Distinction between site and non-site traffic with legible routes for site traffic.
 - Impact on non-site traffic.
 - Key links, junctions and local networks to be defined and assessed and necessary mitigation proposed.
 - Off-site highway works to be defined.
 - Hostile vehicle mitigation measures to be considered.

- 8.18.2 The information submitted accords with the requirements of the Scoping Opinion and the assessments follow appropriate methodologies and practices. The Transport Assessment covers the geographic and topical areas necessary and has been produced by suitably qualified and experienced professionals. The assumptions in the Transport Assessment were reasonable at the time of writing. The Department for Transport has since indicated that traffic levels have largely returned to normal following Covid and so new data can now be collected to enable issues to be better understood. To date the Seaside Way/Bloomfield Road junction has not been assessed. The conclusions of the Environmental Statement are accepted in respect of the multi-storey car park and Heritage Quarter. Further assessment is required however to reflect the return to normal traffic levels. As such, it is recommended that off-site highway works and mitigation measure be agreed through condition once further investigation has been carried out.
- 8.18.3 Link road - it has been asserted that the link road cannot be provided before the courts complex has been relocated because existing court access must be maintained. The cost of maintaining access by other means should, however, be investigated. Seaside Way is the main tourist route into Blackpool from the M55 and, whilst the traffic flow and economic effects of severing the existing link to the town centre are difficult to quantify, they must be considered. Traffic flows in the area should be measured now that conditions have returned to normal. Diversion of town centre traffic onto Chapel Street through the multi-storey car park is not considered to be acceptable. The Transport Assessment is largely silent on how route choices will be managed once the connection is severed and the potential impact could be exacerbated by the temporary loss of parking. Traffic for destinations north of Chapel Street would have to leave Seaside Way at Bloomfield Road or Waterloo Road and use alternative routes. However there is no intuitive route back to Seaside Way from the Town Centre. Various permutations of origins, destinations and routes should be considered with signage and other measures necessary to mitigate impact. This would need to reflect the phasing of development such that resilience of the network is not compromised if development stalls.
- 8.18.4 Coaches and buses - the Transport Assessment is silent on coach travel and this must be rectified. Improved modal share of coach travel should be sought. The applicant has proposed that existing provision is not removed until replacement provision is operational. When the existing link to Chapel Street is severed, coaches will have to use a more circuitous route. The routes to and from the coach station proposed as part of phase 3, and between it and any layover facility require further discussion and design. Further consideration of potential to improve bus connectivity is also required including bus stop upgrades. Works to the access and amendments to signage will be required to maintain access and egress to the retained coach station.
- 8.18.5 Mitigation of traffic disruption - as stated, it is now considered possible for appropriate data to be collected to assess potential impact and necessary mitigation. Appropriate mitigation is likely to include signage and amendments to signal operations. Communication will be key to changing the learned behaviour of many users of existing routes.
- 8.18.6 Off-site highway works - there will be a need for off-site works which should be defined at this stage, including restriction of the amount of traffic onto New Bonny Street and the northern stretch of Central Drive whilst maintaining access to Houndhill and the Town Centre from the south. This would require modification of Hornby Road, Reads Avenue and Coronation Street including associated junctions. Impacts on access to Vance Road, Hull Road, Albert Road and Havelock Street will need to be considered. The latest technology traffic enforcement would be required. The configuration of junctions between the car park

and Central Drive, Chapel Street and the new link road, and Chapel Street and the multi-storey car park must be dealt with or conditioned at this stage. Bus stop upgrades will be required.

- 8.18.7 Pedestrian routes - the initial and interim phases of the scheme would not improve pedestrian links sufficiently. The route north across Chapel Street would be affected by construction of the multi-storey car park and must be addressed. Maintenance of an attractive route to the town centre would require works within the remaining car park and elsewhere with schemes agreed and provided at each stage. The proposed link road would create conflict and consideration of the relationships between pedestrian and traffic routes is required. Off-site works may be required.
- 8.18.8 Trip generation – a more comprehensive assessment of peak periods that would exceed parking capacity is required. They should be specified and a management strategy developed. This should include use of upgraded technology such as variable message signage and should accommodate delays in delivery and future phases. It is reasonable to assume that the Heritage Quarter would generate traffic and this should be factored in.
- 8.18.9 Multi-store car park – the parking should accord with the Council’s standards in respect of electric vehicle charging and disabled/parent and child spaces. At least 10% of spaces should be marked for use by electric vehicles with appropriate infrastructure. Equally 10% of spaces should be for disabled/parent and child. Currently 6% provision is proposed. Appropriate motorcycle parking should be provided. Storage for 64 cycles is proposed but this is unacceptable. Cycle parking should equate to 10% of vehicle parking provision. Long-stay, covered, secure cycle parking in a shed or locker is required. Short-stay cycle parking may be less substantial but should still be covered. Cycle parking should be located close to the main entrances of buildings and be well-lit with a safe, clear route to facilities. It is not considered that the provision proposed would encourage travel by cycle and so provision needs to be re-thought. Associated facilities such as lockers, changing rooms, showers and drying rooms should be provided.
- 8.18.10 Travel Plan – stronger distinction is required between staff and visitors. A strategy for mass coach travel should be outlined. Staff car parking needs to be clarified along with incentives for car-sharing. Cycle facilities need to be clarified (as per above). Staff and visitor travel will require separate strategies. Staff travel is likely to be more localised whereas visitor travel may be nationwide. Targets for travel modes need to be identified. Discounts for public transport use by staff should be investigated as should free taxis for staff on late shifts. The role of the travel plan coordinator should be clarified. Monitoring reports should be annual and the travel plan should run beyond 5 years.
- 8.18.11 Bus services and park and ride – the first phase of development should not adversely affect services. Future service enhancement should be addressed. Opportunities for creation of a park and ride facility should be explored.
- 8.18.12 Conditions – it is considered that conditions are required in respect of the following:
- Traffic data collection.
 - Evaluation of junctions, links and key networks.
 - Evaluation of traffic using Lonsdale Road.
 - Assessment of site and non-site traffic.
 - Impacts on traffic to other destinations to be assessed.
 - Amendments/addenda to Transport Assessment and Travel Plan.

- Off-site highway works.
- Highway mitigation measures.
- Highway and directional signage including latest technologies.
- Stopping-up and traffic regulation order requirements.
- Route options to be considered and defined.
- Evaluation of pedestrian connection to Promenade.
- Evaluation of options for pedestrian routes and facilities.
- Evaluation of connections and routings for coaches.
- Coach parking and layover provision.
- Bus service improvements including routes and stops
- Multi-storey car park and Heritage Quarter access points – design and implementation.
- Clarification of working space for phase 1 including access to police garage.
- Evaluation of options to maintain access to police garage.
- Electric vehicle charging points.
- Cycle facilities.
- Disabled and parent/child parking provision.
- Servicing, loading and access.
- Hostile vehicle mitigation measures.
- Travel Plan.
- Construction Environmental Management Plan including defined compounds and access routes for each stage.
- Surface water drainage.

8.19 **National Air Traffic Services (NATS):** no objection.

8.20 **Blackpool International Airport:** no comments received in time for inclusion in this report. If comments are received in advance of the Committee meeting, these will be reported through the update note.

8.21 **Ministry of Defence (Warton Aerodrome):** no objection.

8.22 **Emergency Planning Officer:** the developer should consider professional advice with regard to flood risk along with proportionate mitigation. All operators should sign up to receive flooding and severe weather warnings. All operators should have incident management and business continuity arrangements in place in the event of a flood or emergency. These arrangements should consider staff, tenants and customers. Appropriate insurance should be in place. Multi-agency flood response plans are in place but the developer and operators should not rely on these. They provide a framework to enable command and control arrangements to support evacuations and rescues in a coordinated and prioritised manner.

8.23 **Head of Strategic Asset and Estate Management:** no comments received in time for inclusion in this report. If comments are received in advance of the Committee meeting, these will be reported through the update note.

8.24 **Blackpool Transport:** no comments received in time for inclusion in this report. If comments are received in advance of the Committee meeting, these will be reported through the update note.

8.25 **Commercial Waste:** no comments received in time for inclusion in this report. If comments are received in advance of the Committee meeting, these will be reported through the update note.

9.0 **REPRESENTATIONS**

9.1 Press notice published: 18/06/21 initially and again on 23/08/21 to correct an error in the description.

9.2 Site notice displayed: 18/06/21 initially and again on 23/08/21 to correct an error in the description.

9.3 Neighbours notified: 15/06/21 initially and again on 20/08/21 to correct an error in the description.

9.4 Nine representations have been received. Two are from Blackpool residents who support the proposal. A further three are from Blackpool residents raising concerns. Two are from residents of Oxford and Stonehaven raising objection on the basis that the site should be reserved for a train station to reopen. The final two have been submitted on behalf of the Pleasure Beach and Her Majesty's Courts and Tribunals Service (HMCTS) and will be summarised separately.

9.5 The representations from individuals raise the following points:

- The site is not well situated for attractions.
- The proposal is not exclusive.
- Loss of views of the Tower.
- Holidaymakers are unlikely to use the space around the King Edward VII buildings as it is over-shadowed and the buildings would create a wind-tunnel.
- Family holiday-makers are more likely to use the Promenade.
- The scheme would overlook the derelict side of Central Drive.
- Fire risk to the King Edward VII buildings.
- The site should be safeguarded for future railway use.
- There is too much traffic in Blackpool.
- The proposal would increase congestion.
- New parking provision should be resisted given the climate emergency.
- Workers would park on existing streets making parking difficult for residents.
- Inadequate encouragement of environmentally friendly or public transport use.
- Seaside Way should be used for primarily pedestrian/cycle/train/tram access.
- Tram access and the tram network should be expanded.
- Inadequate inclusion of green infrastructure.
- No reference within application to the historic use of the site.
- An alternative site should be considered.
- The site is in a deprived area and green space and features should be provided to improve health and well-being.
- The scheme lacks reference to the former Blackpool Central Station railway use.

9.6 Officer response: the proposal does not require consultation with the Health and Safety Executive with regard to fire risk. The development would have to comply with Building Regulations and fire risk would be appropriately considered and managed through this process. The proposal must be considered as submitted, preference for alternative development sites could only be taken into account through the application of the sequential test if such were required. Equally preference for alternative schemes cannot be taken into account. The other issues raised will be discussed in the assessment section of this report.

9.7 The submission on behalf of the Pleasure Beach raises the following points:

- The proposal is for an indoor amusement park that would include white-knuckle and family rides with an ancillary retail, food and drink offer that would directly undermine the existing offer of the Pleasure Beach and Piers in conflict with Policy CS20, Policy RR1 and the Development Plan as a whole:
 - The Pleasure Beach already offers indoor areas and multiple indoor 'dark' rides along with indoor family entertainment centres and ancillary uses.
 - The Pleasure Beach already offers themed elements such as Nickleodeon Land.
 - The Pleasure Beach is misrepresented in the information submitted as an old-fashioned seaside funfair.
 - The proposal is not unique or new to Blackpool.
 - The proposal would not fill a gap in provision but would replicate parts of the existing offer.
 - Use as an entertainment centre could undermine the Coral Island operation.
 - The scheme has changed since it was first announced in 2019.
- The proposal would displace visitors from existing attractions and so would not bring the claimed 600,000 new visitors to the town:
 - Insufficient information has been provided to evidence the claims made.
 - This would impact on job creation and the local economy.
- The scheme fails to take the opportunity to introduce the kind of ambitious development required on the site and so would not have the regeneration benefits envisaged.
- The development would reduce Pleasure Beach confidence in continued investment in new rides (£50m+ invested in last 10 years) which would impact upon the resort offer:
 - The investment in recent years has supported the gradual improvement in resort performance and the increase in visitor numbers.
 - Potential for reduced investment, footfall and employment at the Pleasure Beach, and the impact this could have on the wider resort, has not been taken into account.
- The consultation exercise did not constitute meaningful engagement given the limited time that elapsed between the consultation and the submission of the planning application.
- The information submitted does not provide enough evidence to demonstrate proper consideration of and compliance with relevant planning policy:
 - The planning statement table summarising compliance with planning policy at 10.40 does not include reference to Policy CS20.
- The Leisure Market and Demand Study submitted is flawed because it assumes the development to be a new, complementary attraction that would not cause displacement.
- The estimation of job-creation is likely to be an over-estimation due to the effect of displacement as jobs would likely be lost elsewhere.
- The submitted report warns against future expansion of the theme park offer onto the Promenade due to the potential for cannibalisation of the main site, emphasising the need to differentiate from the existing offer and surrounding attractions.
- The socio-economic topic paper in the Environmental Statement is flawed with regard to visitor numbers and jobs as it again does not consider displacement.
- Indirect spend is also likely to be an over-estimation as the development would draw trade from existing ancillary elements in the town.
- Displacement is considered but is estimated at only 3.5%. This is considered to be a gross underestimation, particularly given the comparable catchment areas of the

proposal and the Pleasure Beach.

- The net employment estimates do not take into account leakage, displacement and deadweight.

9.8 The Pleasure Beach suggests three solutions:

1. Amend the description of development such that it does not reference a type of attraction already available in Blackpool.
2. Imposition of a planning condition that would restrict mechanical theme park rides to no more than 10% of the total floor space.
3. Require the applicant to enter into a S106 legal agreement to ensure that the permission granted does not undermine existing attractions.

9.9 Officer comment: the extent to which the proposal would complement or undermine the existing resort offer in Blackpool will be discussed in the assessment section below. The assessment will consider the merits of the scheme and the extent to which it accords with planning policy. An overall assessment of planning balance, taking due account of all relevant material considerations will be made. It is noted that the Pleasure Beach offers no assessment or evidence to support its assertion that an unacceptable impact would arise. It is not considered that amending the description of development to that of an indoor visitor attraction or entertainment centre as suggested in the manner suggested would substantively change any permitted use, as such descriptions could reasonably be taken to include that of a theme park. Alternative mechanisms such as the use of conditions would be considered more appropriate. The suggestion of a 10% limit on mechanical theme park rides is noted but the Council would have to demonstrate that exceeding this limit would have an unacceptable impact in order for any such condition to be justified, and no such evidence has been presented. It is considered that other, more appropriate, conditions could be imposed to ensure best compliance with policy.

9.10 The submission on behalf of Her Majesty's Courts and Tribunals Service raises the following points:

- Her Majesty's Courts and Tribunals Service holds a long lease on the court building until 2070. Both Magistrates and County Court services are provided.
- The Courts are of strategic importance for the delivery of justice in Blackpool Council.
- It must be possible for evidence to be properly heard in court and external noise has the potential to result in adjournments and delays that would compromise the efficient working of the courts.
- The importance of the site to delivering the long-standing of objective of regeneration and economic growth is accepted and no objection is raised to the proposal in principle.
- The National Planning Policy Framework (para 180) notes that planning decisions should ensure new development is appropriate for its location and mitigate and reduce to a minimum potential adverse impacts from noise. New development should integrate effectively with existing businesses and existing facilities should not have unreasonable restrictions placed on them as a result of new schemes.
- The submitted technical paper on noise and vibration identifies the court building as a highly sensitive receptor. Noise is likely to be worst during construction.
- The technical paper identifies only one instance of noise effect that would be 'significant' in environmental impact assessment terms.
- There is no consideration of 'significance' in relation to the courts operation and so further assessment is required
- Construction activity is proposed to take place during the operational hours of the court. Bespoke construction hours should be agreed with Her Majesty's Courts and

Tribunals Service and conditioned.

- The baseline noise survey was undertaken during Covid and so a more up-to-date assessment is now required.
- Noise conditions should stipulate maximum noise levels rather than a level relative to background noise.
- The submitted information does not consider the impact of operational noise (activity and plant) on the courts, presumably on the assumption that they will be relocated and the building demolished. Further assessment is needed to understand the potential impact of the earlier phases on the courts.
- With regard to vibration, the proposal has potential for significant impact that could result in evidence being inadmissible and the court failing in its duty. The technical paper does not consider the impact of construction vibration on the courts and so further assessment is required.
- Road closures or suspension of on-street parking could affect the operational running of the court and Her Majesty's Courts and Tribunals Service must be informed of all proposals.
- Construction traffic should be managed through condition to minimise impact.
- Increased traffic could impact on the operation of the courts leading to delays. The traffic and transportation technical paper acknowledges challenges to the provision of a ramped link road which could affect access to the prisoner dock.
- The applicant should demonstrate how access to the courts could be adequately maintained were the courts to remain in situ.
- The development of the wider site should not increase flood risk to the courts.
- It must remain possible for sensitive areas of the courts complex to remain private without potential for public overlooking.

9.11 Officer comment: issues relating to noise, vibration, highway impact and drainage will be discussed in the assessment section below. The applicant has met with Her Majesty's Courts and Tribunals Service to discuss their concerns and identify potential solutions. A number of conditions are proposed to provide the safeguards considered necessary. Subject to these conditions it is anticipated that Her Majesty's Courts and Tribunals Service will issue a revised position statement and this would be reported through the update note.

10.0 MAIN PLANNING ISSUES

10.1 This proposal is subject to an Environmental Impact Assessment and an Environmental Statement has therefore been submitted as part of the application. A formal scoping opinion was sought by the applicant and provided by the Council on 31 March 2021. This opinion identified the following topic areas as requiring detailed consideration as part of any planning application:

- Ground conditions and contamination
- Traffic and transportation
- Flood risk and drainage
- Townscape and visual impact
- Ecology and nature conservation
- Socio economic impact
- Noise and vibration
- Air quality and dust
- Built cultural heritage
- Waste

- Climate change
- Human health

10.2 The site is allocated for major-scale leisure development. As set out above, a Supplementary Planning Document was produced in 2011 to guide development of the site and Policy CS20 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 specifically identifies the site as Blackpool's Leisure Quarter.

10.3 In light of the planning policy context and the nature of the application, site and location, the assessment section of this report will be structured as follows to address what are considered to be the main planning issues:

11.1 Principle

- Acceptability of the red edge
- Acceptability of the format of the application
- Acceptability of phased approach
- Acceptability of the proposed leisure uses
- Acceptability of the proposed hotel uses
- Acceptability of the associated retail, food and beverage offer
- Acceptability of the parking provision
- Other general considerations

11.2 Townscape and Visual Impacts

- Key considerations
- Overall townscape and visual impact assessment
- Multi-storey car park
- Heritage Corner
- Outline elements
- Overall visual impact

11.3 Heritage

- Impact on the settings of heritage assets
- Acceptability of works proposed to heritage assets

11.4 Amenity impacts

- Noise and vibration
- Odour
- Loss of light and privacy
- Microclimate/wind-tunnel effects

11.5 Transport and movement

- Highway capacity and function
- Access arrangements
- Parking provision
- Sustainable and inclusive travel promotion
- Pedestrian connectivity
- Overall impact

11.6 Flood risk and drainage.

11.7 Ecology and nature conservation.

- 11.8 Environmental impact
 - Land contamination
 - Air quality
 - Water quality
- 11.9 Climate change, waste and sustainable design considerations.
- 11.10 Community considerations
 - Employment and economic benefits
 - Human health
 - Crime and safety
 - Community considerations
- 11.11 Overall review of Environmental Impact Assessment.
- 11.12 Sustainability and planning balance appraisal.

11.0 ASSESSMENT

11.1 Principle

Acceptability of the red edge

- 11.1.1 Policy CS20 of the Core Strategy and the 2011 Leisure Quarter brief both relate to the application site and the buildings to the west fronting the Promenade. This boundary was intended to define a site that would benefit from a prime seafront location on the edge of the town centre and at the end of the main arrival corridor into the resort.
- 11.1.2 Policy CS20 promotes and encourages comprehensive redevelopment of the entire site. However, the policy goes on to state at point 4 that, where all reasonable measures have been taken to redevelop the entire site, but where it has not proved possible, the retention and improvement of existing buildings will be allowed. This is subject to the proviso that the scheme as a whole meets the development objectives of the Supplementary Planning Document.
- 11.1.3 The application submitted does not include the buildings to the west fronting the Promenade which are in several different ownerships. They fall outside of the red edge and so cannot form part of a comprehensive scheme. The information submitted fails to address this matter.
- 11.1.4 The key consideration, therefore, is whether or not the development as proposed, excluding the buildings fronting the Promenade, could meet the regeneration objectives of the Development Plan. This will be assessed in the remainder of this report.
- 11.1.5 The application site has long been identified for comprehensive redevelopment. The Council has spent well over 20 years attempting to attract investment, facilitate site assembly, and deliver new development on the site to drive its wider regeneration goals. To date, successive attempts, including planning applications in 2001 and 2006, and subsequent discussions with different operators have failed. The current proposal has progressed further

than any other to the point where contracts have been exchanged and completed meaning that, subject to planning permission being secured, there is now a greater likelihood than ever before that redevelopment of the site on a scale of strategic significance could take place.

- 11.1.6 Taking into account the timescales for the development and land assembly, and viability issue associated with acquiring the Promenade frontage buildings, this has precluded the inclusion of these properties within the proposal site boundary. However, as assessed later in the report, it is considered that the exclusion of the Promenade properties does not preclude the design and layout of the proposal from delivering development that would achieve appropriate physical and functional integration with the defined Resort Core and Town Centre in accordance with the requirements of the Supplementary Planning Document. Given the length of time the site has been allocated for redevelopment without success, there is a very real risk that resisting anything other than the site-wide development as required by policy could result in the site remaining in its current state to many years to come.
- 11.1.7 It should be noted that the existing buildings fronting the Promenade are predominantly in leisure use and include the SeaLife Centre and Madam Tussauds. These are two of the resort's best-known attractions. They, along with the other amusement arcades and supporting operations, remain active, viable and successful. Their existing character and function would therefore complement the proposed leisure use of the application site. The inclusion of these buildings within the allocation was intended to give the development a seafront presence. The application seeks to enhance New Bonny Street and Brunswick Street as pedestrian links from the Promenade through to the site, and proposes a way-finding feature in the north-eastern corner that would clearly identify the site from both the Town Centre and Promenade. Visitors would have a clear view of the leisure buildings and public realm down New Bonny Street. Many would inevitably be well aware of the attractions on offer having arrived via car from the M55 straight into the site. As such, the exclusion of the Promenade frontage and the retention of the existing uses is not in itself expected to preclude the proposal from delivering the necessary regeneration benefits.
- 11.1.8 The proposal would also include the retention of the Grade II Listed King Edward VII cinema and the locally listed King Edward VII pub and apartment buildings. However, the Supplementary Planning Document expects the retention of these buildings and would only permit their loss or harm if clearly justified. The buildings would all be significantly improved and fully redeveloped to provide hotel, retail, food and beverage floor space ancillary to the wider development. Together they would form a Heritage Corner on the site with a unique identity and character that would anchor the site to the south-east. Not only would this sustain and enhance the value of these buildings as heritage assets, it would enable a softer transition to the more traditional and smaller scale buildings fronting Central Drive and the corner of Chapel Street. The retention of these buildings would enable the development to respond well to Blackpool's historic townscape and character as required by Policy CS20. On this basis, the retention of the King Edward VII buildings is considered to be acceptable in principle.

Acceptability of the format of the application

- 11.1.9 The Leisure Quarter Supplementary Planning Document sets out an expectation that any application made in outline in respect of the site will seek approval for the matters of layout, scale and access as a minimum. The current application is made in outline with all matters reserved. However, the submitted parameters plans indicate maximum scale and broad

layout and clearly illustrate the vision for the wider site including circulation areas and public realm. The plans enable matters of both scale and broad layout to be conditioned at this stage. Whilst the application does not seek to agree these in detail, it shows what could be achieved and how the site could work and respond to the requirements of the Leisure Quarter Brief.

11.1.10 In addition to the indicative layout plans, the submitted information provides maximum heights for all of the different buildings identified. This gives an indication of the potential impact the development could have upon the townscape and the settings of the nearby heritage assets. The visuals submitted with the application suggest how the site would appear to visitors and users of the immediate area.

11.1.11 Submitting an application with all matters reserved maximises flexibility. Were the exact positions and heights of buildings to be confirmed at this stage, further planning applications would be required to make any substantive changes should the proposals evolve over time. This could result in delays to delivery. The Council could apply conditions at this stage to control the quantum of floor space or the maximum heights of buildings, and would retain control over these matters through future Reserved Matters applications. On this basis, given the amount of illustrative material provided, the format of the application is considered to be adequate to enable a sufficiently robust assessment of the way in which the scheme would comply with the Development Plan.

Acceptability of phased approach

11.1.12 As would be expected for any scheme of this scale, a phased approach is proposed. This is permitted under relevant planning policy. It is suggested that the development would be delivered as follows:

Enabling phase

- i. Multi-storey car park (enabling phase).

Phase 1 – northern half of the site between Bonny Street, New Bonny Street and Central Drive:

- ii. First indoor theme park on western boundary (to northern corner) (1a)
- iii. Public square (1b).
- iv. Hotel to north and north-west of car park (1c).

Phase 2 – to east of proposed car park fronting Central Drive and Chapel Street:

- v. Heritage Quarter.

Phase 3 – south-west corner of the site currently occupied in part by the Courts complex:

- vi. Extension first/second indoor theme park and public realm works (3a).
- vii. Second indoor theme park on western boundary (to southern corner) (3b).
- viii. Third indoor theme park to west of car park (3c).
- ix. Highway works to Seaside Way (3d).

11.1.13 It is necessary for the construction of the multi-storey car park to be the first phase of development, as loss of the existing parking on the site without replacement would have a significantly detrimental impact on the Town Centre and nearby Resort Core areas.

11.1.14 Whilst development of the northern half of the site has been termed phase 1, and the redevelopment of the Heritage Quarter phase 2, the latter element would actually likely be delivered before the former. The applicant has requested a condition that would require commencement of Heritage Quarter works and the submission of a Reserved Matters application in respect of phase 1 within 5 years of any permission granted. It is envisaged that the car park would be delivered by autumn 2022 with the Heritage Quarter following in spring 2024. Although preparatory work for phase 1 would start earlier, hence the numbering, the longer lead-in times would mean that phase 1 would not be operational until the spring/summer of 2025. Phase 3 would be dependent upon the relocation of the existing courts complex and so is unlikely to commence in any way before 2027. The applicant has requested that up to 10 years be allowed for the submission of reserved matters in respect of this element. A condition to require reserved matters applications to be submitted by certain dates would maintain momentum on site. The periods specified would reflect the phasing indicated but allow for significant additional flexibility.

11.1.15 This phasing plan is considered to reflect reasonably the constraints and priorities for the site. It would deliver a good mix of uses in the short to medium terms. The timescales are considered to be proportionate to the scale of development, particularly given the number of years it has taken to get to this point. Whilst planning policy seeks comprehensive development of the site for a scheme of national significance, it would be unrealistic to expect a development on this scale to be delivered as a single entity. Phased delivery is very different to piecemeal development and a phased approach is permitted by the Supplementary Planning Document. As such the phasing proposals are considered to be broadly acceptable.

Acceptability of the proposed leisure uses

11.1.16 The applicant has submitted a Leisure Market and Demand Study (hereafter referred to as the Leisure Study) and this has been independently reviewed on behalf of the Council. As the site is allocated for leisure development, the provision of such uses is appropriate in general terms. Policy CS21 relates to leisure and business tourism and seeks to strengthen the resort's appeal to attraction new audiences year-round. It notes that regeneration of the Resort Core and Town Centre will be achieved by supporting proposals for high-quality new tourism attractions in these areas, including major developments that have the potential to become wider catalysts for regeneration. Policy RR1 of the Local Plan is an older expression of policy but that too permits and encourages proposals for the development, extension or improvement of tourism attractions that draw large numbers of visitors. The first two criteria of this policy require such developments to make a strong positive contribution to regeneration and to increase the range and/or quality of facilities available and contribute to safeguarding and growing Blackpool's visitor market.

11.1.17 Policy CS20 of the Core Strategy relates specifically to the application site. This policy makes it clear that it should be developed for leisure uses of national significance that would provide a compelling new reason to visit Blackpool. Such uses must integrate with and support, but not undermine, the existing offer of the Resort Core. The Leisure Quarter Supplementary Planning Document also sets out the need for the development to be unique, of national significance, to widen the resort offer, attract new audiences and underpin a year-round economy. The Supplementary Planning Document expects the scheme to create a critical mass of attractions to assist resort regeneration.

11.1.18 The application proposes the development of three 'branded indoor theme parks'. The planning statement goes on to explain that this term describes indoor amusement parks, centres or complexes whose target market is families with small children and/or teenagers. A Statement of Intent has been provided to further illustrate the proposals, and explains that the development as a whole would be based on a central theme of "ancient discoveries, aliens, adventure and mystery". The various attractions would all relate to this core theme. It is envisaged that one of the three indoor theme parks would be the principal attraction for the site. The indoor theme parks would likely include a range of attractions including a flying theatre and virtual, white-knuckle and family rides. An indoor adventure sports hub would be included and would also incorporate ancillary retail and themed restaurants. Food and beverage uses are considered to be leisure uses in planning terms.

11.1.19 The comments submitted on behalf of the Pleasure Beach have been taken into account. This representation asserts that the proposal would bring nothing truly new or unique to Blackpool but would instead replicate the character of existing attractions. As a result, it is suggested that the proposal would draw trade from existing operations such as the Pleasure Beach and Piers and would therefore undermine these attractions. It is suggested that the duplication of existing elements in the resort offer would prevent the development from attracting the visitor numbers indicated and would fail to deliver the regeneration intended. As such the Pleasure Beach argues that the scheme would be contrary to Policy CS20 and the Development Plan as a whole.

Would the development proposed be a genuinely new offer in Blackpool?

11.1.20 In terms of compliance with policy, one of the key considerations is whether or not the proposal would complement or undermine the existing resort offer. This hinges largely on the extent to which the development would provide a new and unique attraction to supplement the existing Blackpool offer.

11.1.21 The description of development makes reference to the provision of three indoor theme park buildings. Relatively little information on the nature of the indoor theme parks has been provided or is capable of being secured at this stage. There is no established planning definition of a theme park. In general terms a theme park can be understood as a large area for public entertainment with entertaining activities. The submitted Planning Statement identifies the indoor theme parks as *sui generis* uses. This description of development allows for a very broad interpretation as would be the case if alternative, generalised descriptions such as indoor entertainment centre or indoor visitor attraction were utilised.

11.1.22 The Statement of Intent submitted with the application provides more detail on the character and imagery of the attractions and the way they would relate to existing attractions. A unifying theme of ancient discoveries, aliens, adventure and mystery is proposed across the site. A mix of rides, games, experienced and shows in a themed environment to generate an average stay of 4 hours is envisaged. Each theme park would have significant theming with a strong sense of adventure and storytelling.

11.1.23 On the understanding that the indoor theme parks would be high-quality, themed as indicated, branded, on a large scale, indoor and year-round, it is considered that they would be largely complementary. However, this would be dependent upon the imposition of conditions that would establish greater certainty of the nature of the use than that provided by the description of development. Such conditions could require the agreement of the fundamental aspects of the overall theme and the sub-themes for each indoor theme park,

to include concepts, characters, key colours, location settings and narrative. They could equally establish details of the individual attractions within each indoor theme parks and the way in which these would relate to one another and the theme. It should also be noted that the proposed height limitations on the buildings would prevent the provision of the kinds of rides that operations such as the Pleasure Beach are best known for.

11.1.24 The themed flying theatre is identified as being a genuinely new and unique attraction.

Although an artisan food/beverage market has recently been approved in the town centre, there is no such offer currently attached to a leisure use in Blackpool. The adventure sports hub is considered the most similar to existing Blackpool attractions, albeit not as part of a wider, themed experience.

11.1.25 When viewed as a whole on the scale proposed, the combination of uses under a unifying theme and the fact that they would be indoor is considered to provide a sufficiently unique offer to meet the requirements of policy. The conditions proposed would enable the Council to agree details beyond those which could be secured at reserved matters stage, such as internal design, fittings and appearance, that would ensure that the indoor theme parks are suitably complementary in nature to the existing resort offer.

Would the scheme generate the resort regeneration and growth required?

11.1.26 To answer this question, an understanding of the likely number of visitors that would be attracted to the development is required. It is also necessary to understand how many of these visitors would be new to Blackpool. The number of new visitors is important to enable an assessment of the potential impact on existing attractions in the resort. If Blackpool Central attracts a substantial number of new visitors to Blackpool, this would support the wider resort. If the development instead draws visitor numbers away from existing attractions rather than attracting new spend, this would not fulfil the objectives of planning policy.

How many visitors would the development attract?

11.1.27 It is acknowledged that predicting visitor numbers is challenging, particularly in the absence of a fully worked up scheme. This is because there are relatively few attractions that can be considered to be direct comparators, and those that do exist tend to be overseas or in city conurbations with wider catchment areas, meaning that the locations are not comparable. Furthermore, Blackpool can be considered to be a mature tourist destination with a substantial and well-established tourist offer. This makes it harder to predict the likelihood of linked trips, extended stays and displaced spend. The lack of detail submitted with the application in respect of the exact nature of the attractions has also made it difficult to fully predict visitor numbers, although the submission of the Statement of Intent has provided some more illustrative detail and clarity. Nevertheless, it is inherently difficult to predict outcomes for a unique attraction in a unique location.

11.1.28 The Leisure Study submitted identifies potential for 1.5 million annual individual visitor trips to Blackpool Central as a whole, with the key attractions drawing around 712,000 visitor trips annually. In the submitted Environmental Statement (technical paper 6 on socio-economic impact), the number of unique visitors to Blackpool Central, as opposed to visitor trips, is estimated at 620,000. Based on the information provided in the Environmental Statement, it is estimated that some 521,000 or 84% would be new visitors to the resort. This would represent an increase in visitor numbers of around 2.9% over the 18.2 million

visitors understood to come to Blackpool annually (based on the independent research carried out by STEAM in 2018).

11.1.29 The figure of 712,000 annual visitor trips to the three main attractions (indoor theme park 1, the Flying Theatre and the Adventure Park) has been based on an assessment of both the market and the visitor to figures to other attractions of similar type and scale. This approach is reasonable. Notwithstanding the inherent uncertainties involved in formulating predictions from this kind of information, as described in paragraph 11.1.26 above, the figure of 712,000 annual visits is considered to be plausible. The total number of visitors to the site based on the three key attractions, estimated at 620,000 has then been derived by making assumptions about the likely proportion of linked trips between these three elements. Again, given the unique nature of the development and location, these figures are based on informed estimations rather than clearly comparable data.

11.1.30 The total visitor numbers the site would attract is important for two reasons. Firstly, the number of new visitors to Blackpool cannot be established if the number of overall visitors is unknown, and secondly the likely demand for overnight accommodation cannot be estimated. However, and as set out above, assumptions have to be made to estimate the number of visits from the market data, and further assumptions are made to translate this into a visitor number. It is this layering of assumptions that generates the uncertainty, and it is unavoidable because there is no other way to arrive at a prediction of visitor numbers. Scenario testing could be carried out to understand the potential impact of each assumption, but so many are involved that the resultant range of potential outcomes would likely be meaningless. The consultants engaged by the Council have advised that the figure of 620,000 as an estimation of total visitor numbers to the key attractions is not intuitively unreasonable. As such, and on balance, the Council has accepted this figure as the baseline for further assessment.

Would these visitors be new to Blackpool or drawn from existing attractions?

11.1.31 Planning policy requires the development on the site to attract significant new visitors to Blackpool.

11.1.32 The information provided in the Environmental Statement by the applicant suggests that 84% or 521,000 of the 620,000 visitors to the site would be new to Blackpool. However, this figure assumes that all resident visits from the wider catchment area beyond the Fylde, and all tourist day-trip visits from this wider catchment would be 'new' visitors.

11.1.33 The consultants engaged by the Council to review the information submitted consider it would be prudent and realistic that scenarios whereby 40-60% of visitors to Blackpool Central are assumed to be new to the resort are considered to inform the Council's assessment. Scenario testing using 40% and 60% additionality rates has therefore been carried out.

Impact on overall visitor numbers to the resort

11.1.34 Using the 18.2million annual visitors recorded by STEAM in 2018 as the resort benchmark, and applying additionally rates of 40%, 60% and 84% would result in the new visitor numbers set out in table 1:

Table 1: New visitor numbers

<i>Additionality rate (the proportion of the total number of the 620,000 predicted visitors who would be new to the resort)</i>	<i>Number of new visitors attracted to the resort by Blackpool Central</i>	<i>Number of visitors displaced from existing attractions</i>	<i>Increase in total visitor numbers to the resort as a result of Blackpool Central</i>
40% - lower end of consultant prediction	248,000	372,000	1.4%
60% - higher end of consultant prediction	372,000	248,000	2.0%
84% - applicant prediction	512,000	108,000	2.8%

Implications

11.1.35 Planning policy does not stipulate a target in terms of visitor numbers. Instead, it aspires to a development of national significance that will provide a compelling new reason to visit Blackpool and support resort regeneration and growth.

11.1.36 As stated above, it is very difficult to benchmark a unique attraction in a unique location due to lack of comparators and lack of information available. However, the following attractions offer some comparison with the new visitor numbers in table 1 above, and the overall predicted visitor number of 620,000, in terms of their national significance:

- Sandcastle Waterworld – largest indoor water park in UK – 325,000 (2019)
- Blackpool Tower and circus – 480,000 (2009)
- Blackpool Pleasure Beach – 5.5 million (2007)
- Eden project – 1.0 million (2019)
- Thorpe Park – 1.9 million (2019)
- Legoland Windsor – 2.4 million (2019)
- Chessington World of Adventures 1.7 million (2019)
- Stonehenge – 1.6 million (2019)
- Tower of London – 3.0 million (2019)
- St. Paul’s Cathedral – 1.7 million (2019)
- Westminster Abbey – 1.6 million (2019)
- Blenheim Palace – 985,000 (2019)
- The Ice Cream Farm (leisure theme park in Chester) – 782,000 (2019)

11.1.37 Even in the most pessimistic scenario considered, assuming that the total visitor figure of 620,000 can be justified, the three key attractions would draw a quarter of a million new visitors to the resort. The Council is mindful that the figure of 620,000 does not account for any visitor numbers generated by phase 3 of the proposed development. This could indicate that 620,000 is an underestimation. However, it is equally noted that the submitted leisure study clearly considers the three key elements of phase 1 to be the main driver of the scheme in terms of generating visitor demand. Even if 620,000 is accepted as being a cautious prediction, this figure in relation to those cited above would indicate that, whilst the proposal would certainly be of regional significance, it is questionable whether or not it would, in itself, be of national significance. This would conflict with criteria 1 of Policy CS20 of the Core Strategy.

11.1.38 As stated above, Blackpool is an established tourist destination. As a resort it is unquestionable of national significance. On the understanding that the offer would be sufficiently different to that already available in the resort, the development would therefore provide a compelling new reason for visitors to come to Blackpool. Furthermore, the indoor nature of the attraction would help promote year-round visits to support a more stable visitor economy without such marked on seasonal peaks. The development may also widen the demographic of visitors by attracting more affluent visitors, including those from further afield. This would be supported by the inclusion of an artisan market. All of these considerations would underpin and support Blackpool's position as a destination of national importance, which is the fundamental objective of the Development Plan as reflected by goal 3 of the Core Strategy.

11.1.39 When considering the impact on existing attractions, it must be recognised that any major new attraction anywhere in Blackpool would have a competitive effect as visitors inevitably have a finite amount of time and money and therefore have to make choices about what to visit. Using the more pessimistic scenario presented by the Council's consultants, the development would draw 372,000 visitors away from existing attractions. However, these 'lost' trips would be spread between existing attractions and, based on the information available, would likely represent a limited proportion of the total visitor numbers they currently enjoy, particularly given the level of differentiation. The Pleasure Beach, for example, is estimated to attract over 5 million visitors each year and so would be unlikely to be unduly impacted by competition from Blackpool Central. Smaller scale attractions such as the Sandcastle Waterworld may be more affected, but the degree of differentiation would provide additional buffer. The competitive impact is also likely to peak in the short-term and then level in future years as the novelty value of the new attraction diminishes.

11.1.40 Overall, the proposal is anticipated to provide a compelling new reason to visit Blackpool that would complement rather than undermine existing resort attractions. Rather than discouraging investment in existing attractions, the proposal may force existing operators to invest in order to remain competitive. The development would generate potential for linked trips and extended visitors stays, and would improve the year-round offer and attract a new demographic of visitor. It would therefore have the ability to increase spend at other attractions to provide some off-set for any displacement. The scheme could reasonably be expected to improve investor confidence in the resort and act as a catalyst for further new development and regeneration.

11.1.41 In light of the above, it is considered that the leisure offer proposed would constitute a compelling new reason to visit Blackpool, deliver numerous benefits and support the regeneration and growth of the wider resort. It is further considered that it would not unduly undermine existing attractions. Whilst, based on the evidence currently available, it is not considered possible to conclude that Blackpool Central in itself would be necessarily be a leisure development of national significance as required by policy, it would nevertheless reinforce Blackpool's position as the nation's favourite seaside resort. The conflict with Policy CS20 must be viewed against conformity with the Development Plan as a whole. On balance and for the reasons set out above, the leisure provision proposed is considered to support the objectives of the Development Plan.

Acceptability of the proposed hotel uses

11.1.42 Policy CS20 is permissive of complementary hotel development that would add value and support major leisure development on the site. Policy CS21 supports provision of new visitor accommodation within the Town Centre and Resort Core. As such, holiday accommodation is an appropriate use on the site. The Leisure Quarter Supplementary Planning Document discusses hotel provision on site in more detail and suggests that such accommodation should be high-quality of 3-5* standard. In order for the development to support wider resort regeneration, hotel provision on site should meet no more than 60% of the demand for visitor accommodation generated by the scheme. The requirements set out in the Supplementary Planning Document are considered to be justified in order to ensure that the scheme delivers the regeneration benefits sought by the Development Plan.

Qualitative assessment

11.1.43 In terms of quality, whilst the aspiration of the Supplementary Planning Document is acknowledged, the planning system cannot reasonably require attainment of a particular accreditation standard of accommodation. Instead, it can ensure quality provision through agreement of layout and design. No details of the hotel accommodation proposed as part of the outline element of this application are available at this stage. However, the external appearance and internal layout of this element would be agreed through reserved matters and appropriate quality secured at that stage. It is understood that the applicant envisages the hotel being of 4* standard.

11.1.44 The application proposes use of the King Edward VII pub and apartment building as holiday accommodation in the form of an apart-hotel. Although the final details of the provision are unlikely to be known until an operator is identified, it is envisaged that each studio would provide en-suite facilities and provide for self-catering. The larger units would provide kitchen and lounge areas. Ordinarily the Council requires self-contained holiday accommodation to meet the same standards as permanent residential accommodation in order to ensure adequate quality and allow for future flexibility. However, this approach reflects the fact that the majority of proposals for self-contained holiday accommodation are small-scale and relate to individual, traditional properties. Typically, these smaller schemes do not include any communal facilities and could not be classified as apart-hotels. In contrast, whilst the accommodation proposed within the Heritage Quarter would fall significantly short of the Council's adopted standards, the accommodation would form part of a wider conversion scheme.

11.1.45 Both the pub and apartment buildings as converted are expected to include a range of food and beverage offers at ground floor level and the visitor accommodation would be accessed through these areas. Whilst final details of operation are unavailable this early in the development process, it is understood that uses would be run together with a degree of synergy between the different elements. As such, and in the context of the wider development, it is accepted that the accommodation proposed in the Heritage Quarter would function in the manner of apart-hotels. The studios vary in size to suit a range of visitor requirements and it is anticipated that the smaller rooms could be combined with adjoining units to form suites. All studios would have views out over Central Drive or Chapel Street and so would benefit from good levels of natural light and outlook. There is no reason to suppose that the units would not be fitted out and maintained to a high standard consistent with the overall ambition to deliver a high-quality visitor experience across the site. As such, and subject to final details of the provision being agreed through condition, the quality of the holiday accommodation proposed in the Heritage Quarter is considered to be acceptable to support the regeneration objectives for the site.

11.1.46 The details of the layout of the hotel accommodation proposed as part of the outline element of this application are not available at this stage. However, it is considered that an appropriate quality of provision could be secured at Reserved Matters stage.

Quantitative assessment

11.1.47 In terms of quantitative provision, a Hotel Demand Assessment Report (hereafter referred to as “the hotel study”) has been submitted. This has been independently assessed on behalf of the Council. Initially the hotel study made reference to 150 hotel bedrooms and assumed that 20% of visitors would stay overnight. The application proposes the creation of 47 apart-hotel bedrooms in the Heritage Quarter and up to 200 hotel bedrooms as part of the outline element of the scheme. As the existing King Edward apartment building currently contains 30 holiday bedrooms, this has been deducted from the total. As such, the hotel study has been amended to reflect the fact that the scheme would deliver up to 217 new holiday bedrooms. The calculations therein have also been revised to assume that 19% of visitors would stay over-night, as this is the proportion of overnight visitors identified in the 2019 Blackpool Visitor Economy data.

11.1.48 The demand for room nights generated by a development is calculated on the basis of the proportion of total visitors that stay overnight. If 19% of visitors stay overnight, and 620,000 visitors to the site are expected, then this would equate to a gross demand for 117,800 room nights generated by the development.

11.1.49 However, not all visitors staying overnight would require their own hotel/apart-hotel bedroom. It is reasonable to assume that couples, families and groups would share accommodation. As such, to understand the number of bedrooms that could be supported by the scheme, this figure of room nights must then be divided by an average room occupancy rate. The applicant has considered comparable hotel operations to that proposed and has indicated an anticipated average room occupancy rate of 1.7. This is based on 30% single occupancy and 70% double occupancy. This would appear to suggest that no family occupation has been taken into account. It has been explained that this would be balanced by occupation of double rooms by single travellers. This may be a reasonable assumption in many locations but, as Blackpool Central is stated to be aimed at families, it is unclear on what basis a significant number of solo stays would be generated. However, in the absence of other available evidence to the contrary, the occupancy rate presented by the applicant has been applied. Using the suggested occupancy rate of 1.7 to the gross demand of 117,800 room nights would generate a net demand for 69,294 room nights.

11.1.50 The total number of room nights provided by a scheme is calculated by multiplying the total number of rooms provided by the 365 nights in a year. A reasonable occupancy rate is then applied. In this case, the submitted hotel study has identified that an occupancy rating of 77% would be comparable with other hotels of a similar standard. However, information produced by CBRE and provided by the applicant identifies occupancy rates of 72.7%-74.3% to be more prudent with an initial occupancy rate of 68% for the first three years. For a development offering 217 new bedrooms, these various occupancy rates would produce room night numbers ranging from 53,859 to 60,988. If the initial occupancy rate of 68% is discounted, the range would be 57,820 to 60,988. However, it is important to note that the figure of 620,000 reflects visitor numbers based on phase 1 of the development proposed. Phase 1 would only provide up to 200 rooms in the proposed hotel. The remaining 17 additional rooms in the Heritage Quarter would be delivered under phase 2. The accommodation proposed under phase 1, 200 rooms, would generate room nights ranging from 53,071 to 56,210.

11.1.51 The figures above must be treated with caution. Firstly, they are based on predicted total visitor numbers which have been reached by making assumptions in relation to the market for the development and the attractiveness of the development. Secondly, they are based on a prediction of the proportion of visitors who would stay overnight, and thirdly they reflect assumptions relating to overall and individual room occupancy levels. As stated above, the layering of assumptions to reach a conclusion inevitably introduces an increasing level of uncertainty. It is known that the figure of 620,000 reflects visitors to the three key attractions rather than the scheme as a whole. Although these attractions are understood to be the key drivers of visitor numbers, the applicant has nevertheless suggested that total visitor numbers could be 800,000 for phases 1 and 2, and 1,000,000 for the development as a whole. The applicant has also suggested that the proportion of overnight stays at 19% could be an under-estimate, and that a figure of 25% may be more appropriate given the potential for the scheme to attract more affluent visitors and reinforce the existing critical mass of the visitor offer in Blackpool, thereby providing general resort uplift. The applicant has therefore presented scenario testing.

11.1.52 Working on the basis of 620,000 total visitors for phase 1 with 19% staying overnight, the accommodation proposed under phase 1 would meet between 77% and 81% of demand. If phase 1 of the scheme were successful in increasing the proportion of overnight stays to 25%, the hotel accommodation would meet 58%-62% of demand. These figures are based on occupancy rates of 72.7%-77%. As stated above, the applicant has suggested that an occupancy rate of 68% is more realistic in the first three years of operation whilst a hotel becomes established. Using an occupancy rate of 68%, and assuming that 19% of visitor stay overnight, phase 1 would meet 72% of demand generated. If 25% of visitors stayed overnight at this occupancy rate, this would drop to 54%.

11.1.53 Considering the later phases of development, if total visitor numbers for phases 1 and 2 reached 800,000, with 217 new bedrooms then available in the hotel and Heritage Quarter, assuming a 19% proportion of overnight stays would see the development meeting 64%-68% of the demand generated. If the proportion of overnight stays was successfully increased to 25%, this would drop to 49%-52%.

11.1.54 Looking long-term to a point at which the site is fully delivered and operational, if total visitor numbers reach 1,000,000, the scheme would meet 52%-55% of the demand it generates assuming that 19% of visitors stay overnight. If an overnight stay rate of 25% was achieved, this would drop to 39%-41%.

11.1.55 The numbers above suggest that phase 1 of the development would have to be successful in increasing the proportion of overnight stays to around 25% compared to the Blackpool average of 19% in order to comply with the objectives of the Supplementary Planning Document. Even if the lower initial-3yr occupancy rate of 68% is applied, compliance could only be achieved if more than 22% of visitors stayed overnight. An increase in over-night stays over the Blackpool average would also be required once the Heritage Quarter becomes operational for policy to be met, albeit to a lesser extent. Only when the scheme is fully developed and operational would policy be met without an uplift in over-night stays assuming a total visitor number of 1,000,000 can be achieved. In this circumstance, the objectives of the Supplementary Planning Document would be exceeded which would increase the benefits that would spill out into the wider, existing holiday accommodation sector.

11.1.56 The relevant planning policies for the site seek to achieve a development that provides a compelling new reason to visit Blackpool and thereby strengthens the existing resort. It is not unreasonable to assume that this enhancement of the critical mass of attractions could increase the proportion of visitors that stay overnight. As set out in paragraph 11.1.50 a number of assumptions have had to be made to enable any kind of meaningful quantification of supply and demand. These assumptions introduce uncertainty and this requires the numbers set out above to be treated with caution. What can be said with some confidence is that the development would generate some demand for over-night stays that could not be met on site. This surplus demand could be absorbed by existing holiday accommodation provision creating wider benefit. This is the fundamental aim of the requirement set out in the Supplementary Planning Document. As such, and whilst there is uncertainty as to whether or not the Supplementary Planning Document limit of 60% maximum provision would be met, on balance the hotel provision proposed is considered to sufficiently align with the provisions of the Development Plan.

Acceptability of the associated retail offer

11.1.57 The National Planning Policy Framework defines 'main town centre uses' as including, amongst others, retail, leisure and entertainment uses, restaurants, bars and pubs. The Framework makes it clear that main town centre uses should be located in town centres, then in edge-of-centre locations and then in out-of-centre locations subject to the sequential test. When considering edge-of-centre locations, preference should be given to sites that are well connected to the town centre.

11.1.58 The adopted Development Plan for Blackpool defines a Town Centre boundary and a Principle Retail Core within the town centre. Paragraph 5.52 of the Local Plan states that "the Principle Retail Core of Blackpool Town Centre contains the main shopping streets and the majority of the large multiple retailers...". At Annex 2 the National Planning Policy Framework identifies that a Primary Shopping Area is the defined area where retail uses are concentrated. Although the terminology used is different, officers consider that the Principle Retail Core identified in the Development Plan represents the Primary Shopping Area of Blackpool Town Centre as defined in the National Planning Policy Framework as they have the same purpose. In this regard, the National Planning Policy Framework is clear that the boundary of the Principal Retail Core / Primary Shopping Area acts as the defined centre for retail purposes, with the Town Centre boundary representing the defined centre for leisure purposes. This means that the site is in a town centre location in terms of the food, beverage, hotel and leisure components of the application, but an edge-of-centre location in respect of retail.

11.1.59 The National Planning Policy Framework requires applications that are not in a town centre, or within the Primary Shopping Area of a town centre where one is defined, and that are not in accordance with an up-to-date Development Plan, to be subject to a proportionate impact assessment. This requirement is subject to a floorspace threshold. Where there is no local threshold in place, the national threshold of 2,500sqm applies. Emerging Policy DM15 proposes local thresholds and, as this site is within 800m of the Central Drive local centre, and as the application proposes more than 200sqm of retail floorspace, this emerging policy would require an assessment. As no objections have been received in relation to draft Policy DM15, it can be afforded reasonable weight in accordance with paragraph 48 of the National Planning Policy Framework.

- 11.1.60 Policy CS20 is permissive of complementary ancillary retail on the site that would add value and support major leisure development. Neither the policy nor the supporting text makes specific reference to food and beverage uses, but these are considered to be leisure uses in planning terms as set out at Annex 2 of the National Planning Policy Framework. Furthermore, the Leisure Quarter Supplementary Planning Document identifies ancillary retail development and food and drink uses in the form of shops, cafes and restaurants as being appropriate uses on the site. In this document there is no reference to drinking establishments, but again they are now considered to be leisure uses. The Supplementary Planning Document also requires town centre uses on the site to be positioned in such a way as to provide a transition between the site and the Town Centre but without continuous retail frontages.
- 11.1.61 Policy CS4 of the Core Strategy states that within the town centre, retail and other town centre uses will be supported where they are appropriate to the scale, role and function of the centre. As stated, the application site falls within the defined Town Centre boundary but outside of the Principal Retail Core.
- 11.1.62 As the site is located 'in-centre' as far as the proposed food and beverage offer is concerned, the key consideration is the acceptability of the proposed retail uses on what is an edge-of-centre site relative to the primary shopping area of the town centre and the nearby local centre. No sequential appraisal or impact assessment has been submitted with the application. The applicant has, however, submitted a Retail Compliance Statement in support of their application and this has been independently assessed on behalf of the Council.
- 11.1.63 The existing site is stated to offer 1,850sqm of retail floor space in Bonny Street Market and 850sqm in the King Edward VII apartment building at ground floor level. This amounts to some 2,700sqm. Under the scheme proposed, independent retail floor space would be limited to around 226sqm within the King Edward VII apartment building, and 234sqm in the proposed free-standing building in the north-eastern corner of the site. This detached unit could equally be used for a food and/or beverage offer. As such the maximum independent provision would be 460sqm. Whilst the amount of existing floor space within the market which is used for the sale of retail goods is considered to be less than that stated, it is still accepted that the proposal would represent a significant reduction in independent retail floor space relative to the existing situation. Nevertheless, the scheme would include provision of new retail floor space of up to 460sqm and must be assessed on that basis.
- 11.1.64 In terms of the sequential test, the relevant policies support the provision of ancillary retail on the site. Independent retail units would not ordinarily be considered to be ancillary to a leisure-led development. Of the 226sqm retail floor space proposed in the King Edward VII apartment building, 53sqm is existing. The remaining 173sqm would be new floor space created in the extension and so the applicant should demonstrate compliance with the sequential test. The most recent Council survey of the Town Centre undertaken in August 2021 noted 28 vacant units of various sizes within the Principal Retail Core of the Town Centre. Amongst these are units that would be comparable in size to the two new retail units proposed in the apartment building which would measure 59sqm and 114sqm. On this basis, this element of the proposal fails the sequential test. Paragraph 91 of the National Planning Policy Framework states that, where an application fails to satisfy the sequential test, it should be refused. However, the purpose of the sequential test is to safeguard the vitality and viability of the defined Town Centre and Principal Retail Core. In this case, as set out above, the proposal as a whole would see a significant reduction in the amount of retail

floor space on the site. On this basis, whilst the sequential test is not satisfied, no substantive impact upon the health of the Town Centre is anticipated. The conflict with the sequential test therefore does not weigh against the application.

11.1.65 The 234sqm free-standing unit proposed in the north-eastern corner of the site would also provide new floor space and would appear to be independent from the rest of the development. However, this building is intended to function as a link between the site and the town centre both visually and in terms of providing a focus of activity. A tall, architectural way-finding feature is proposed as part of the building design to reinforce this role. On this basis, whilst the unit may not be ancillary to the wider development in terms of goods sold, it would nevertheless function in an ancillary manner to the overall scheme. As such, this element is considered to be sequentially acceptable.

11.1.66 In terms of the requirement for a retail impact assessment, as set out above, the floor space proposed would be within 800m of the Central Drive local centre and would surpass the threshold of 200sqm gross floor space in emerging Policy DM15 for submission of an impact assessment. Although no such assessment has been provided, it is, nevertheless reasonable to assume that the retail proposed on the application site would be aimed at a very different market to that of the existing Central Drive local centre shopping provision. Local centres are primarily intended to meet the day-to-day needs of the immediate walk-in catchment. The retail proposed on site would primarily be aimed at visitors to the Blackpool Central development. On this basis, the retail floor space proposed on site would not be expected to have a significant adverse impact upon the vitality and viability of the nearby Central Drive local centre.

11.1.67 The scheme also proposes ancillary retail floor space within the indoor theme parks. This has not been quantified. An ancillary use is generally taken to be one that is subordinate to and closely related to the main use, and which could be included in a scheme without it resulting in a significantly greater impact on the environment. It is typically accepted that ancillary elements can take up to 20% of overall floor space. As some 23,000sqm of leisure floor space is proposed, this could equate to up to 4,600sqm of retail floor space. This matter has been discussed with the applicant and it has been agreed that a condition should be imposed on any permission granted to restrict retail sales to no more than 20% of the floor space of each indoor theme park, and to limit the goods sold to merchandise and souvenirs relating to the indoor theme park theme. As this would ensure that the retail sales within the indoor theme parks would be truly ancillary and directly linked to their wider leisure function through the associated controls imposed by conditions, the sequential test is satisfied and it is unlikely to have a significant adverse impact on the vitality and viability of the town centre.

11.1.68 In light of the above, no unacceptable conflict with the aims of the sequential test is identified and no unacceptable impact upon the health of the Town Centre is anticipated. The retail provision proposed on site is therefore considered to accord satisfactorily with the objectives of the Development Plan.

Acceptability of the car parking provision

11.1.69 The multi-storey car park would provide around 1,300 parking spaces. This would form phase 1 of the development. A future phase would provide around 400 additional spaces beneath one of the proposed indoor theme parks alongside a coach station with stands for 8 coaches to be loaded or unloaded with the use of longer duration layover parking spaces off-

site, potentially on Central Corridor between Princess Street and Rigby Road.

11.1.70 Policy CS20 of the Core Strategy requires any development of the site to provide adequate parking facilities to serve both the development and the town centre. This replicates the objective set out in the Leisure Quarter Supplementary Planning Document for any scheme to provide a suitable level of convenient town centre parking in addition to car and coach parking requirements for the development. Page 28 of the Supplementary Planning Document indicates that around 800 parking spaces should be provided on site to meet town centre demand. This figure roughly equated to 80% of on-site provision at the time and was based on data from 2007/2008 that found that 81% of visits to Central Car Park were short stay and therefore likely to be linked with town centre use.

11.1.71 The existing car parks on site are recorded in the information submitted as providing 1057 spaces. An internal review of Council car parks in May 2021 found Central car park to have 748 car spaces and 8 coach bays, Bonny Street car park to offer 142 spaces and Chapel Street surface car park to provide 217 spaces. This gives an existing total provision of 1,107 spaces.

11.1.72 In light of the above, when considering the acceptability of the quantum of parking proposed, there are two key issues: firstly, what parking demand would be generated by the development and, secondly, what would constitute reasonable provision for the town centre.

11.1.73 The applicant proposes a range of uses on site and a schedule is provided within the submitted Planning Statement. This is summarised in table 1 below along with the parking demand that would be generated. This demand has been calculated in respect of both the existing maximum standards as set out in the saved Local Plan, and the emerging standards proposed in Part 2.

11.1.74 The standards set out in the saved Local Plan are maximum standards that take into account the accessibility of the site. In this case the accessibility of the site has been deemed to fall into the high accessibility bracket, albeit at the bottom end of that range. It should be noted that emerging Policy DM41 that relates to parking has not been subject to substantive objection and so weight can be attached to these standards.

Table 2: Parking demand generated by the development using Local Plan standards

<i>Element</i>	<i>Floor space</i>	<i>Applicable Local Plan parking standard</i>	<i>Parking demand - saved Local Plan</i>	<i>Applicable Part 2 parking standard</i>	<i>Parking demand - emerging Part 2</i>
Use of King Edward VII picture house for food and drink uses, formerly classes A3/A4	635sqm	1:9.5-12	53-67 spaces	1:9	71 spaces
Use of part of King Edward VII pub for food and drink uses,	552sqm	1:9.5-12	46-58 spaces	1:9	62 spaces

formerly classes A3/A4					
<i>Element</i>	<i>Floor space</i>	<i>Applicable Local Plan parking standard</i>	<i>Parking demand - saved Local Plan</i>	<i>Applicable Part 2 parking standard</i>	<i>Parking demand - emerging Part 2</i>
Use of part of King Edward VII pub as apart-hotel	10 bedrooms/studios	65% - 85% bedroom nos.	7-9 spaces	1 per bedroom	10 spaces
<i>Element</i>	<i>Floor space</i>	<i>Applicable Local Plan parking standard</i>	<i>Parking demand - saved Local Plan</i>	<i>Applicable Part 2 parking standard</i>	<i>Parking demand - emerging Part 2</i>
Use of part of King Edward VII apartments for retail, formerly class A1	112sqm	1:26-33	3-4 spaces	1:23	5 spaces
Use of King Edward VII picture house for food and drink uses, formerly classes A3/A4	277sqm	1:9.5-12	23-29 spaces	1:9	31 spaces
Use of part of King Edward VII apartments as apart-hotel	37 bedrooms/studios	65% - 85% bedroom nos.	24-31 spaces	1 per bedroom	37 spaces
Total for full element of the development(Heritage Quarter)		156 - 198 spaces		216 spaces	
Proposed leisure buildings x 3	22,962	1:29-38 plus coach space for 2,500sqm +	604-792 spaces	1:26	884 spaces
<i>Above including indoor theme park 1 and associated themed restaurant as estimated by applicant</i>	<i>10,340</i>		<i>272-357 spaces</i>		<i>398 spaces</i>
New hotel	200 bedrooms	65% - 85% bedroom nos. plus coach if 30+	130-170 spaces + coach bay	1 per bedroom plus coach if 30+	200 spaces + coach bay
New food and drink uses within hotel building	1,920sqm	1:9.5-12	160-202 spaces	1:9	213

New unit to north of public square for retail/food/drink, formerly A1/A3/A4	234sqm	1:26-33 for A1 1:9.5-12 for A3/A4 1:18-22 on averages	11-13 parking spaces	1:9	26
Total for outline element of the development		905 - 1,177 spaces		1323 spaces	
Total parking requirement for scheme		Saved Local Plan: 1,061 – 1,375 spaces		Emerging Part 2: 1,539 spaces	

11.1.75 As the application site has been calculated to fall at the bottom end of the 'high' accessibility grade, it could be considered reasonable to conclude that parking should be provided at the top end of the saved Local Plan range indicated; 1,375 spaces. However, it must also be considered that the saved standards are maximum standards, introduced as such in order to prevent excessive parking provision and encourage travel by other modes. As such, and given the present-day focus on climate change and sustainability, use of the lower figure could be justified. Both figures are clearly lower than what would be required by Part 2, but Appendix D1 to Part 2 indicates that a flexible approach to parking provision should be applied, particularly in highly accessible locations such as the town centre.

11.1.76 The applicant has used an alternative method to calculate car parking demand. The submitted Transport Assessment identifies a predicted Friday peak of 700 cars and a Saturday peak of 1094 cars. Averaged they would give a maximum parking demand of around 900 spaces. This figure is for the scheme as a whole. For phases 1 and 2, the figures are 688 on a Friday and 964 on a Saturday. This would give an averaged maximum parking demand for phases 1 and 2 of 826 spaces.

11.1.77 The figures above would appear to establish an overall parking demand for the completed development of 900-1536 spaces.

11.1.78 Turning to the town centre requirement, it is acknowledged that the Supplementary Planning Document is now ten years old and that the research justifying the figure of 800 spaces was carried out 14 years ago. Assessment of ticket sales between April 2019 and March 2020 reveals that some 72% of car park use was short stay, and it is reasonable to assume that this relates to town centre use. Applying this percentage to the existing parking provision of 1,107 gives a figure of 797 spaces that the development should provide in order to meet town centre needs. On this basis, whilst the underlying figures have changed, the requirement of 800 as set out in the Supplementary Planning Document would appear to be reasonable.

11.1.79 Based on the figures above, the parking requirement for the site for the development as a whole including the provision of town centre parking would likely be in the region of 1700-2336 spaces.

11.1.80 As stated above, the proposal would create 1700 parking spaces in total. Some 1300 of these would be created in the enabling phase in the multi-storey car park with 400 delivered as part of phase 3. It is intended that the car park would be operational in spring 2023 and this would give a short-term increase of around 200 spaces over existing provision.

- 11.1.81 Looking at the medium term, it is proposed through condition that the Heritage Quarter would be commenced and reserved matters applications submitted in respect of phase 1 within 5 years of any permission granted. Together the phase 1 and 2 elements would generate demand for 729-1053 spaces. This range is based purely on planning policy as the data submitted by the applicant would suggest an average maximum demand of 826 spaces. Added to the town centre demand, this would suggest a total parking demand for phases 1 and 2 of around 1530-1850.
- 11.1.82 At first glance, the parking provision proposed in the multi-storey car park would seem to be insufficient to meet the needs of the development in the medium term. Long-term, the scheme has been designed to meet the lowest predicted level of parking demand.
- 11.1.83 Predicting car-parking demand is not an exact science. Both the Council's parking standards and the figures used by the applicant to estimate parking demand are based on Trip Rate Information Computer System (TRICS) data. This is an industry standard that is extrapolated using accepted and robust techniques. However, TRICS data is formulated on empirical data from schemes elsewhere. Such schemes may be similar in size but equally unique in nature and in a very different location. As such, the figures can, at best, provide a guide. It is further acknowledged that traffic levels can vary by 20% over the course of a year.
- 11.1.84 There are currently around 4,000 parking spaces in the Town Centre and the Council is in the process of implementing a Town Centre Parking Strategy. The increase in parking provision in the short term would provide a buffer to assist with this process. The Leisure Quarter Supplementary Planning Document seeks any development on site to improve modal share for coaches. As such a condition would be attached to any permission granted to require measures to encourage and support coach travel to be explored and implemented, and this could reduce private car travel. Saturation days when the site cannot cope with parking demand already occur and it is inevitable that this would occur as part of any future development. On such days demand is managed elsewhere either in the Town Centre for shoppers or on Central Corridor for tourists or by means of Park and Ride provision.
- 11.1.85 The development proposed is within the defined Town Centre boundary and Resort Core of an established tourist destination, and it would sit alongside numerous tourist attractions. As such it is reasonable to assume a significant amount of linked trips. Furthermore, as the scheme is intended as a comprehensive development, the total figures in table 2 will potentially incorporate a significant degree of double counting. In addition, it must be remembered that the existing parking provision under the courts complex, amounting to some 208 spaces, would be retained on site for use until such a time as phase 3 progresses. This could help to meet parking demand generated by phases 1 and 2 and the town centre requirement.
- 11.1.86 Alongside the consideration of parking provision on site, it should be noted that the Council's Executive authorised expenditure of up to £16m from the Council's Capital Programme in February 2019 to provide additional town centre parking. The parking proposed on Blackpool Central, therefore, would be part of a wider strategy for parking delivery to meet both Town Centre and Resort Core requirements.
- 11.1.87 It is reasonable to assume that the scheme would bring new visitors to Blackpool, that patronage could be predicted and modal split estimated using established methodologies. However, given the potential for linked trips and the, as yet unknown, future consequences of Covid, Brexit and climate-change, great caution should be exercised when assessing exact

figures. It is not considered reasonable to plan to accommodate the peaks as this would result in an inefficient use of land. The quantum of parking provision proposed has been considered by the Head of Highways and Traffic Management Services who has raised no objection. As such and on balance, the amount of parking proposed is considered to be acceptable.

- 11.1.88 A condition could be applied to any permission granted to require a review of parking pressures on the site at an appropriate time and ensure that the second and third indoor theme parks are not brought into use until the final 400 spaces are available if this is deemed to be necessary based on the information presented.

Acceptability of the coach parking provision

- 11.1.89 The parking standards set out above in table 2 would indicate a requirement for 1 or 2 coach parking bays on site. No coach parking provision is proposed within the multi-storey car park. Blackpool generates a significant amount of coach traffic and so established provisions are already in place for coach parking. There is an existing coach station on Central car park and, in time, it is intended that this would be replaced by a new coach station under indoor theme park 3. However, coach parking to serve this area of the Resort Core would continue to be based on Central Corridor between Princess Street and Rigby Road. It is considered that this would be sufficient to meet the demand generated by the development although improvements, such as the provision of adequate shelter, may be needed. As such, the lack of dedicated coach parking on site is considered to be acceptable.

11.2 Townscape and visual impacts

Key considerations

- 11.2.1 The site itself is not designated as protected landscape or townscape. It does, however, form part of the setting for the Town Centre Conservation Area, the Foxhall Conservation Area, and a number of statutorily and locally listed buildings. The Huntsman building, the Pump and Truncheon/Number 13 pub, the Stanley Arms and the former Methodist church on Chapel Street all face onto the site and all are locally listed. In addition, the King Edward VII pub and apartment buildings are both locally listed and the former King Edward VII cinema is Grade II listed. The Town Centre Conservation Area to the north includes a number of key listed buildings including St. John's Church, the Winter Gardens complex and the iconic Blackpool Tower. The site is therefore considered to be visually sensitive.
- 11.2.2 The potential visual impact of the development on Blackpool Tower is an important consideration. The Tower is central to the town's identity and is a renowned feature on the skyline. It is visible from the M55 motorway and views of it are of strategic significance. Policy LQ7 of the Local Plan stipulates that development which would have a detrimental impact on strategic views will not be permitted, and stipulates views of the Tower from along the main transport corridors into the town centre as being of strategic importance. This protection would be continued under emerging Policy DM19 of Part 2.
- 11.2.3 Paragraph 126 of the National Planning Policy Framework states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development. Paragraph 130 explains that developments should function well and add to the overall quality of an area; be visually attractive and sympathetic to local character and

history; should establish a strong sense of place and optimise the potential of a site; and should create places that are safe, inclusive and accessible that promote health and well-being and a high standard of amenity without fear of crime. The importance of landscaping is emphasised in paragraph 131. Paragraph 134 states clearly that development that is not well-designed should be refused.

- 11.2.4 Policy CS7 of the Core Strategy relates to quality of design and expects new development to be appropriate in terms of scale, mass, height, layout, density, appearance, materials and relationship to other buildings. Schemes are expected to be safe, accessible, green, adaptive and well-integrated and should not compromise amenity. This policy continues the requirements of Policies LQ1, LQ2, LQ3 and LQ4 of the Local Plan which set out more detailed expectations. Again, these requirements are encapsulated in emerging Policy DM17 of Part 2. Policy LQ4 expects tall buildings to create a landmark where one is required without detracting from views of existing landmarks. It also expects facades to be appropriately detailed, address the street and human scale at base level, and incorporate definite rhythm, proportions and patterns at upper floor level. Profile should be used to add depth and texture and high-quality, durable materials that reflect local context are required.
- 11.2.5 The National Design Guide identifies ten characteristics of good design. These relate to context, identity, built form, movement, nature, public spaces, uses, building details, resources and lifespan. Paragraph 129 of the National Planning Policy Framework states that the National Design Guide should be used to guide planning decisions where no local design guides are in place.

Townscape and visual impact assessment

- 11.2.6 The Blackpool Central development as a whole has been designed around the need to maintain the iconic and strategic views of Blackpool Tower on the way in from Seaside Way and the indicative layout plans reflect this.
- 11.2.7 As part of their Environmental Statement, the applicant has submitted a technical chapter on townscape and visual impact. This has been reviewed and is considered to meet the relevant Environmental Impact Assessment regulations. The submitted Townscape and Visual Assessment considers a range of receptors and impacts on view-points. It assesses the impact during the construction and operational phases and includes a night-time assessment. The Townscape and Visual Assessment takes into account the existing character and quality of the townscape and visual environment. The sensitivity of the identified receptors is graded in the Townscape and Visual Assessment and the magnitude of change or effect assessed. The significance of any impact is then calculated using a matrix. Eight Townscape Character Areas are identified and these cover areas immediately adjacent to the site and at distance. Impact on short, medium and long views are all considered. The Townscape and Visual Assessment has been carried out on the basis of a 'worst-case' scenario and so all impacts have been judged on the maximum building heights specified taking into account proposed land levels.
- 11.2.8 The construction phase of any development of this scale would inevitably have a significant townscape and visual impact. In the case of Blackpool Central, construction is expected to last for around a decade. However, as the existing built form around the site will offer some screening, the effects are likely to be very localised. Nevertheless, it would have a moderate adverse impact on the closest character areas. It would also have a moderate to high adverse impact on visitors to Blackpool Tower, nearby leisure attractions and the

Promenade, and on local residents. Users of affected transport routes, the adjacent Conservation Areas and nearby listed/locally listed heritage assets would experience a moderate adverse effect. These levels of impact would be dependent upon agreement of a Construction Environmental Management Plan through condition as mitigation. This could make provision for work to be limited to daylight hours to avoid light pollution; for materials to be stored in locations that would not impact on views; and for traffic diversions to be minimised. Attractive and engaging hoarding panels should be used to provide screening and this could also be secured through condition. Nevertheless, the inevitable impact during construction weighs somewhat against the application.

11.2.9 The overall impact of the operational phase is somewhat harder to assess at this stage given that much of the proposal is in outline with all matters reserved. The assessment is therefore based on the full elements and the parameters information provided. It is assumed that the different elements of the outline application are appropriately designed and considers the full elements as submitted. The scheme as proposed is expected to result in a moderate benefit in townscape and visual terms to the nearby Promenade, Town Centre and residential character areas and on the approach along Seaside Way. The effect on the other character areas would be neutral or of negligible/minor benefit because of intervening features and the fact that it would sit within the wider skyline. Visitors to Blackpool Tower and the Promenade are expected to experience high/substantial townscape and visual benefits because the nature of the site would reinforce their expectations of the resort and form part of their strategic view. Nearby residents and users of the surrounding shops and leisure uses would benefit moderately. Users of the listed and locally listed buildings on and around the site and in the Town Centre and Foxhall Conservation Areas would experience minor benefit. Transient users on the local transport networks including Seaside Way would also experience a minor benefit. These anticipated positive townscape and visual impacts weigh notably in favour of the scheme.

11.2.10 With regard to the detailed design of the scheme, the Townscape and Visual Assessment notes that the playful, bold or brash appearance of many amusement centres in Blackpool is an intrinsic part of the resorts character, and that new materials and unique design features can be appropriate. The façade of Coral Island including the parrot are an example. The focus must therefore be on quality. Public realm and landscaping design, quality and maintenance would also be key and a conditions to require agreement of a Public Realm Management Plan and landscaping strategy are recommended. It is suggested that artwork be provided along Seaside Way to reinforce the sense of arrival and this could be secured through condition.

11.2.11 As the Townscape and Visual Assessment conclusions assume appropriate design meeting the relevant objectives, the acceptability of the detailed design proposed is considered below.

Multi-storey car park

11.2.12 The proposed multi-storey car park would be set over seven levels and would be a maximum of 22m high. The basic footprint would be 48.9m x 103.2m. It would have four stair cores, one of which would sit on the northern elevation, one to the west and two on the eastern side. The vehicular circulation core would also sit on the eastern side of the building. Internally this circulation area would comprise two adjacent 'D' shapes producing a long, shallow projection of 6.2m x 47.4m. This projection would be flanked on either side by the two eastern stair cores. These would be between 9.7m and 12.8m in length and L-shaped with the lift element projecting around 4m and the stairwells about 2.5m. The northern

stair-core would also be L-shaped and 16.3m in length. This would project between 3.8m and 4.8m from the main face of the building but would also form a corner feature by projecting 0.9m beyond the western elevation. The fourth stair core to the west would be rectangular measuring 12.2m in length with a 3.2m projection. These projecting circulation elements would help to break up the massing of the elevations by creating visual depth. At the southern end of the building, the top floor would be set back by 5m.

11.2.13 As set out in the description of the proposal, the main body of the building would be finished in silver anodised aluminium panels. These would be perforated, with two levels of perforation proposed. The elevations would be made up of rectangular panels in a grid formation but this pattern would be broken up by diagonal gaps in the cladding which would delineate between the two varieties of perforation.

11.2.14 The car park would be a large building that would inevitably have a significant visual impact on the street scene and townscape. The impact on the strategic view from Seaside Way will be discussed further into this assessment. From Chapel Street the car park would be viewed against the backdrop of the Heritage Quarter on the approach from the west but would nevertheless occupy a space that is currently open. The most significant impact would be on the area around the junctions with Kay Street and Kent Road which currently has an open feel. The car park would entirely obscure views of Blackpool Tower from here and would establish a more urbanised character. Chapel Street is used by both tourist and resident traffic but it is not a strategic route. Kay Street and Kent Road in particular are primarily local thoroughfares. Glimpses of the Tower through the urban fabric can be found across Blackpool and are a part of its character that local residents are accustomed to. Consequently the loss of view from these secondary areas would not be significant.

11.2.15 The building would also have a significant impact on the street scene for road users travelling south on Central Drive. Here the building would replace open surface car parking and again be an imposing presence. It must be acknowledged that this site has long been allocated for major-scale development. It sits in the heart of the urban area and was formerly occupied by Central train station. As such, whilst a significant impact is inevitable, development of the scale proposed is considered to be appropriate. The acceptability in visual terms therefore rests on the quality of design.

11.2.16 The southern elevation of the car park would be the first seen by visitors to the site. At lower ground floor level there would be vehicular access and egress points onto Chapel Street, but this would not be particularly visible on the approach from Seaside Way. The set back of the top floor would help to lessen the massing of the building on the approach and overall the elevation would have identifiable bottom, middle and top sections. Signage is indicated within the middle section, although this would be subject to separate Advertisement Consent, and lighting is proposed. Nevertheless, overall the elevation would include relatively little of architectural interest to excite or engage visitors on their way in to the site.

11.2.17 The eastern elevation would include two stair cores and the projection housing the vehicular circulation. This would help to break up the massing. The diagonal separations and varied perforations would extend from first floor up to roof level. The eastern elevation would largely only be visible from the properties forming the Heritage Quarter and from the outdoor space between the buildings. At such proximity, users would struggle to read the elevation as a whole. The top of the elevation would be visible from Central Drive over the existing roofs of the buildings forming the Heritage Quarter, and this would be most appreciable along Reads Avenue which offers the longest view. Overall, however, the design

of this elevation is considered to be acceptable in the context.

11.2.18 The northern elevation would face onto the existing surface car park in the short term. In time it is envisaged that the northern elevation would be largely concealed by the proposed hotel that would have a maximum height of 25m. However, based on the phasing condition requested it may take seven years or more for construction of the hotel to commence. The northern elevation would include a prominent, projecting stair core in at the western corner clad in gold to contrast with the rest of the elevation. Otherwise the remainder of the elevation would be very blank with little to break up the massing. Given the long term intention to develop to the front, the applicant is unwilling to incorporate additional detailing to provide visual interest.

11.2.19 The western elevation would arguable be the most engaging as it would include two stair cores, one finished in gold on the north-western corner, and one breaking up the massing of the elevation. The western elevation would also include the primary vehicle access egress point and an area of landscaping sufficient to accommodate trees is indicated to the front. This would again help to break up the massing. The elevation would also be reasonably well detailed in terms of varied perforation and diagonal breaks. It is anticipated that the former police headquarters building will be demolished in spring 2025. Thereafter and until any development of phase 3, the western elevation would be highly visible on the approach along Chapel Street.

11.2.20 Policy CS20 of the Core Strategy requires development on the site to demonstrate the highest quality of design. It is recognised that a multi-storey car park by its nature, scale and functional requirements presents a significant design challenge. Nevertheless, it must be acknowledged that the design presented is fairly standardised in appearance and offers little in terms of innovation. The use of diagonal detailing makes some reference to the structure of Blackpool Tower but otherwise the building would not particularly reflect its context or establish a sense of place. The access cores would break up the massing to some extent but otherwise little visual depth would be created and the limited variety and relatively straightforward application of materials would prevent the elevations from being truly engaging. Although the cladding would establish a degree of rhythm, the building would not address the human scale particularly effectively. It is accepted that use of lighting is proposed to create visual interest and this could help to overcome the concerns raised, particularly in hours of darkness or low-light. Overall, the design is considered to be acceptable in general terms but not of the highest quality as expected by planning policy.

11.2.21 Turning to the materials, the use of metallic finishes is supported, particularly the use of contrasting tones, although the use of only two shades would limit the degree of visual interest generated. The metal panels would reflect light well and change in appearance as the sun tracks around the building. They would also provide a good base for light displays and general illumination. Metallic finishes can convey a sense of excitement and dynamism which is appropriate for the wider use of the site. The use of perforation would be an effective way to vary the appearance of the panels to create a sense of movement and give some contrast and visual interest. Overall the materials proposed are considered to be visually acceptable.

Heritage Quarter

- 11.2.22 As stated above, the retention of the existing Heritage Quarter buildings fronting Central Drive and Chapel Street is considered to be positive. These buildings are all either statutorily or locally listed to reflect their heritage and architectural value and they make a strong, positive contribution to the character and quality of the street scene. They would also help transition between the more traditional scale of development to the east and south and the larger scale formats proposed on the site. The priority, therefore, must be to enhance the value of these buildings with any alterations to be incorporated sensitively and thoroughly justified.
- 11.2.23 The former King Edward VII picture house (“the picture house”) is a grade II Listed Building. The application proposes to retain and repair all original features on the frontage wherever possible. The stonework would be cleaned and made good. The existing and unsympathetic extension to the northern side would be removed and replaced with a lightweight glazed covering over a walkway to the open space to the rear of the Heritage Quarter. This covering would have a zigzag design and would sit just behind the frontages of the buildings on either side. It would not seek to replicate any architectural features but would clearly present contrasting modern element. This obvious and intentional juxtaposition between old and new is an appropriate architectural approach that makes the evolution of the building legible. At the rear of the building a non-original single-storey extension would be removed and replaced with a flat-roofed projection. The form, materials, glazing and design is considered to be acceptable in the context. Roof-lights would be inserted to either side of the main roof. These alterations would not be easily visible from public vantage points other than the surrounding buildings and would have little impact on the appearance of the street scene and limited impact on that of the building. Overall, the design of the picture house is considered to be high quality and the resulting building would make a strong, positive contribution to the appearance and quality of the locality in line with the requirements of planning policy.
- 11.2.24 The King Edward VII public house (“the pub”) is a locally listed building. Again the application proposes to retain and repair all original features where possible. Stone façade detailing would be restored. The existing dormer would be rebuilt to better reflect the design and detailing of the original building. A non-original extension would be removed to the rear and a doorway to the west would be replaced with a window to match those existing. On the Chapel Street elevation, a ground floor window would be reinstated to match those that are original and a new ground floor shop-front would be installed at the western end. This would be centralised beneath the first floor windows and would otherwise be well designed. Overall the alterations proposed to the pub would be of a good quality that would be sympathetic to the original form and design of the building. The result would again make a positive contribution to the appearance and quality of the locality in line with the requirements of planning policy.
- 11.2.25 The most significant alterations to the Heritage Quarter would relate to the former King Edward VII apartment building (“the apartment building”). The single-storey retail units to the north would be demolished as would the two storey extension to the rear. A new single-storey extension would be provided to the rear along with a five-storey high rear extension that would house the stair core and lift-shaft. Most significantly, a five-storey extension with rear projecting stair core would be erected to the north to continue the building. This extension would increase the length of the building by over 40%. A set back fourth floor would also be added in place of the mansard roof that forms a fourth floor at present.

11.2.26 By virtue of its scale, the extension would have a significant impact on the appearance of the Central Drive street scene. At present this part of the site is occupied by a single storey building that is book-ended to the north by a gable wall that is around two-storeys in height. The frontage is dominated by solid roller-shutters and the building has a tired appearance that detracts from the quality of the area. The extension would increase the overall massing of the building on the approach from both directions. The properties on the eastern side of Central Drive at this point are three-storey giving the street a relatively tight character. The extension would continue this character and the feel of dense urban form but would also draw the eye forwards towards Blackpool Tower. The impact on Havelock Street would likely be more significant although it would affect fewer users. At present the street enjoys a relatively open aspect over the single-storey element and the open car park. The proposal would see half of this aspect taken up by a five-storey building. However, given the nature of the area and the spacing, this would not appear unduly incongruous or over-bearing. On the approach from the north, the extension would be viewed alongside the multi-storey car park which would be the more substantial element. Against this context it would read well and would not have an incongruous, over-bearing or otherwise unacceptable visual impact.

11.2.27 The side extension would comprise a recessed section directly adjoining the existing building that would be clad in a dark grey material. The northern part of the extension would then step forward again to be level with the main building and this would be faced in brick to match what is existing. This grey section would not only help to break up the massing of the frontage, it would clearly articulate the divide between old and new. Again this is an appropriate architectural approach. The grey cladding would be carried up to face the new top floor which would be set back by 1.3m from the front and by between 3-3.6m at either end. This set back would prevent the building from appearing unacceptably over-dominant and would provide a sense of proportion. A glazed balustrade would sit behind the existing parapet. The stair cores at the rear would rise above the main part of the building but this would not be easily visible other than at distance and would, in any event, step the building up to the car park. At upper floor level, the new extension would continue the proportions of the existing windows. The spacing of the existing fenestration is not consistent whereas a more regular grid pattern is proposed on the extension. Overall the result would be suitably balanced. The extensions to the rear would be relatively functional in design but would be appropriate in the context.

11.2.28 At ground floor level, new shop-fronts are proposed along the Central Drive frontage. Again these would be well-designed. At the rear, the modern zigzag roofed canopy coming in from Central Drive would be continued. This would read as a distinct and modern element and would create coherence between the different elements of the Heritage Quarter and the space to the rear. Taken as a whole, the alterations proposed to the apartment building are considered to be good quality and appropriate in the setting. The resulting building would make a strong, positive contribution to the quality and appearance of the street scene and would accord with the requirements of policy.

Outline elements

11.2.29 In respect of the outline element of this hybrid application, issues of scale, layout and appearance are not matters for consideration at this stage. Nevertheless, maximum parameters of scale have been identified and indicative layout plans have been provided.

11.2.30 By virtue of their intended scales, the outline elements of the proposal would inevitably have a significant visual impact upon existing street scenes and views. Blackpool Tower would be further obscured from Cragg Street, Singleton Street and Coop Street, for example,

but, as these are again local roads, local residents would not be unacceptably affected by the impact on these passing glimpses. The scale of development would not appear unduly incongruous from these points. From Chapel Street and Central Drive, the outline elements would be viewed against the overall context of the site and the scale of development indicated would again be appropriate in this urban setting. The proposed public realm would help to retain the existing open character of the north-eastern corner. The inclusion of a 6m high building incorporating a taller way-finding feature would not appear unduly incongruous in the setting.

11.2.31 The characters of Bonny Street and New Bonny Street would change significantly as these are largely open at present on the side of the application site. Nevertheless, the form and nature of the proposed development would fit well with, and continue, the character of the surrounding uses. Bonny Street would become far more visually enclosed but this is very much a secondary route and so no undue harm is anticipated. Overall, given the long-standing allocation of the site and the character of the surrounding area, it is considered that the indicated scale and position of the buildings would be acceptable subject to the details of design. Suitable solutions for the outline elements of the scheme could be secured at reserved matters stage.

Night-time appearance

11.2.32 As a significant amount of illumination would be expected on site, consideration has been given to the night-time appearance of the development. Both operational and 'experience' lighting has been evaluated. It is recognised that agreement of a detailed lighting scheme would be required through condition. It is understood that lighting would be provided to all external areas but that it could be designed to avoid excessive energy use or light pollution. Lighting to the multi-storey car park would follow highway standards and design and would de-activate when the car park is not in use. The Heritage Quarter would be illuminated in a way to encourage use of the outdoor space, highlight entrances and aid wayfinding.

11.2.33 The most significant contributor to light spill and sky glow would be the experience lighting. This would come from façade lighting, signage and amenity lighting to the public realm areas. There would be potential to extend the illuminations experience into the site. Light projections and interactive installations could also be provided through a scheme to be agreed through condition, as could the potential for lighting to be embedded in the perforated structure of the multi-storey car park.

11.2.34 The illumination of the site is anticipated to have a minor adverse impact upon the immediate Promenade character area through increase in light-spill and skyline glare, although this is considered to be characteristic of this area. The Town Centre would experience minor-moderate adverse impact as would the nearby residential areas. Again this impact is considered to be characteristic of the wider area albeit that the light sources would be brought closer. The impact on more distant character areas is considered to be neutral or negligible. Minor adverse impacts are also expected for users of Blackpool Tower and the Promenade through observable change. Nearby residents would experience moderate adverse impact as would users of the site. Users of the nearby Conservation Areas and listed and locally listed buildings would see a moderate-minor adverse impact with shoppers and leisure visitors experiencing a minor adverse effect. For all users, however, the impact would be characteristic of the setting. As appropriate lighting strategies could be agreed through condition, and given the surrounding context and the desire for development on site to be exciting and engaging year-round including into the evening, the adverse impacts identified

are not considered to weigh materially against the application.

Overall visual impact

- 11.2.35 The Townscape and Visual Impact Assessment also considers residual and cumulative impact. As you would expect from the above, it concludes that the construction phase would have an adverse impact, which could be high for users of the Tower and the immediate vicinity, but that would generally range from negligible to moderate elsewhere. This would be temporary. The operational phase in contrast would deliver permanent benefits that would be neutral, minor or moderate for more distant receptors but substantial for visitors to the Tower and nearby Promenade. Where cumulative effects are anticipated, they would generally be positive with no unacceptable impacts identified.
- 11.2.36 Overall the indicative parameters of scale and layout are considered to be acceptable. The arrangement of the site to maintain strategic views of Blackpool Tower is strongly supported, as is the intention to provide an architectural way-finding feature in the north-east corner to visually link the site to the Town Centre and Promenade. It is considered that an acceptable design to meet the expectations of planning policy could be secured for the outline elements at reserved matters stage. The works to the Heritage Quarter are considered to represent a significant visual improvement that would support the regeneration objectives for the site. This weighs clearly in favour of the scheme. The design of the multi-storey car park is considered to be acceptable in itself but not of the high-quality hoped for in this location. As stated, this weighs notably against the proposal.

11.3 Heritage Impact

- 11.3.1 The National Planning Policy Framework recognises the importance of heritage assets and stipulates that great weight must be given to their conservation. The greater the importance of the asset, the greater the weight to be applied. Any harm to or loss of an asset requires clear and convincing justification. Substantial harm to a designated asset can only be permitted if certain criteria can be met, less than substantial harm must be weighed against the public benefits of the proposal. A balanced judgement must be applied to schemes affecting non-designated heritage assets.
- 11.3.2 Policy CS8 of the Core Strategy relates to heritage and supports proposals that retain and reuse assets whilst conserving and enhancing their significance and setting. The policy equally seeks to enhance the setting and views of heritage assets and strengthen existing townscape character. Policies LQ9 and LQ10 of the Local Plan relate to Listed Buildings and Conservation Areas respectively. They again expect development to be appropriate and preserve or enhance heritage assets. Emerging Policies DM26, DM27 and DM28 of Part 2 relate to Listed Buildings, Conservation Areas and Non-Designated (locally listed) Heritage Assets and would also continue the requirements of the National Planning Policy Framework.
- 11.3.3 As part of their Environmental Statement the applicant has submitted a Built Cultural Heritage Technical paper. This is considered to meet the Environmental Impact Assessment requirements.
- 11.3.4 The Built Cultural Heritage paper considers the impact of the various aspects of the development on heritage assets. The construction phase is anticipated to have a moderate to high adverse effect on the settings of Listed Buildings. In relation to the Conservation

Areas and the locally listed buildings, the residual adverse construction work impacts are expected to range from negligible to minor/moderate. Again it must be noted that these negative effects would be temporary and subject to the agreement of an appropriate Construction Environmental Management Plan to provide mitigation. It is also recommended that a condition be imposed on any permission granted to secure an appropriate recording of the buildings of the Heritage Quarter prior to the commencement of works.

- 11.3.5 The operational phase would have a largely neutral residual impact other than the reuse of the former picture house which would have high/substantial benefit, and the reuse of the other Heritage Quarter buildings which would have minor benefit. These benefits would be permanent. No cumulative impacts are identified. Members should note that a separate, parallel Listed Building Consent application has been submitted in respect of the proposed works to the former King Edward VII cinema.
- 11.3.6 The Built Cultural Heritage paper concludes that the works to the former picture house would deliver high/substantial heritage benefit and that the works to the former pub and apartment building would be of minor heritage benefit. The impact of the change to the setting of these buildings would be neutral, as would the impact on the setting of wider heritage assets such as Blackpool Tower. This is because the strategic views of the Tower as a landmark would be retained and because the buildings proposed would be of similar scale to others in the townscape. The site also enjoys reasonable separation to the surrounding heritage assets. The multi-storey car park would be similar in height to the apartment building and the space it would occupy makes limited contribution to the significance of these assets.
- 11.3.7 It is recognised that the former picture house has been empty for many years and is in a dilapidated state. The King Edward VII apartment building is the last remaining structure from the Central Station complex. As such the retention and reuse of the Heritage Quarter buildings is welcomed. The buildings as proposed would make a strong, positive contribution to the quality, character and appearance of the street scene and are important assets for the local community. It has been agreed that all original features such as windows, tiles, fireplaces, plasterwork and joinery should be repaired and retained wherever practicable, and this would be secured through condition. Whilst views of the Tower and the settings of various heritage assets would be affected, the impact of the scheme would be positive as the current setting is poor.
- 11.3.8 Archaeological potential for the site is very low but some domestic housing remains may survive and so a watching brief should be secured through condition. Experience lighting has the potential to impact upon heritage assets and so a condition should be imposed to require agreement of this, including a full assessment of effect. Rendered CGIs should also be secured to illustrate future phases of the scheme.
- 11.3.9 Whilst views of the Tower would be blocked in some places, the setting of the Tower has changed over time and new glimpsed views would be created. The Tower would remain as the dominant landmark and key views would be unaffected.
- 11.3.10 Overall, the proposed use is considered to be appropriate given the history of the site and its place and function within the resort. Where a development would result in less than substantial harm to a heritage asset, paragraph 202 of the National Planning Policy Framework requires that harm to be weighed against the public benefits. In this case the

harm arising would be less than substantial. The scheme would, however, deliver very significant public benefits as discussed elsewhere in this report. Furthermore, the proposal would have a beneficial effect on the setting of existing heritage assets, and would secure an appropriate, viable future for the buildings of the Heritage Quarter. On this basis the proposal is considered to be in accordance with the provisions of section 16 of the National Planning Policy Framework and Policy CS8 of the Core Strategy. The resulting heritage benefits weigh in favour of the scheme.

11.4 Amenity impacts

Noise and vibration

- 11.4.1 As part of their Environmental Statement, the applicant has provided a technical paper in respect of noise and vibration. This document is considered to comply with the relevant Environmental Impact Assessment requirements. There is potential for noise and vibration from fixed and mobile plant during demolition and construction and also for noise from construction traffic. During the operational phase, increased traffic and servicing could be sources of noise, as could amplified music from the uses and general activity of patrons. Nearby residents are considered to be highly sensitive receptors as is the existing Courts complex and the proposed hotel accommodation. Other receptors are considered to have low or no sensitivity. The nearby heritage assets will have higher sensitivity to vibration. The significance of impacts is assessed on a worst case scenario basis.
- 11.4.2 The proposed hotel would suffer high/substantial adverse noise impact from the demolition of the courts. The construction phase is anticipated to have a moderate/high adverse noise impact on nearby residents, the courts complex and all other receptors except the apart-hotel in the apartment building which would be minor/moderate adverse. In terms of vibration, people in the area would experience a minor adverse impact and nearby heritage assets would experience a substantial adverse effect. Operational noise, regardless of source, is anticipated to result in no more than a minor adverse impact. Residual noise impact from the development following mitigation would not exceed minor adverse level and cumulative impact with other developments has been considered.
- 11.4.3 In terms of mitigation, the agreement of a Construction Environmental Management Plan would minimise impacts as far as is reasonable by stipulating working hours, standards and methods. Implementation of vibration monitoring at sensitive receptors could be secured through condition, as could agreement of appropriate working methods through the Construction Environmental Management Plan. During the operational phase, mitigation could be achieved by installing quiet items of plant that are screened to minimise noise and that only operate when necessary. Double door-sets could be used to prevent noise leakage along with noise limiting sound systems and considerate working practices, e.g. no disposal of bottles during unsociable hours. The construction techniques, materials and window fittings used on the proposed hotel and apart-hotels would need to be designed to protect against noise. It is recommended that a condition be attached to any permission granted to require an assessment of potential noise impact including any necessary mitigation for each phase of development. Use of the public realm for open air concerts clearly has potential to generate noise but such events would be subject to a licence requirement.
- 11.4.4 The representation submitted on behalf of the Courts is noted and it is acknowledged that it is essential that justice delivery is not unduly compromised by the development. It is understood that the applicant has liaised with the Courts over this matter and is prepared to work with them as far as is reasonable to minimise impact. This could be achieved through

regular meetings during construction to schedule specific works and providing a main point of contact for issues. Construction traffic would be routed to avoid the main Courts access and monitoring could be carried out to ensure that any risk from vibration could be identified early and a solution agreed. Revised comments from the Courts are anticipated in advance of the Committee meeting and will be reported through the update note.

- 11.4.5 Overall, and subject to the imposition of appropriately worded conditions, no significant impacts arising from noise or vibration that would weigh notably against the application are anticipated.

Odour and dust

- 11.4.6 The applicant has submitted a technical paper on air quality, odour and dust as part of their Environmental Statement, and this is considered to be compliant with Environmental Impact Assessment regulations. Air quality will be considered in more detail within section 11.8 on Environmental Quality.

- 11.4.7 The construction phase clearly has the potential to generate dust but this would not be expected during the operational phase. Dust can impact upon human health and create issues through soiling. Overall, the demolition, earthworks and construction activities would be expected to have a minor to moderate adverse impact. A range of mitigation measures relating to the storage of materials and cleaning, as well as the agreement of a Dust Management Plan are recommended to limit impact and could be secured through condition.

- 11.4.8 The operational phase could introduce new sources of odour and future users could be susceptible to off-site odours sources. Odour is not anticipated to be an issue during the construction phase. Overall odour nuisance is anticipated to have a minor adverse impact on sensitive receptors. Use of appropriate kitchen ventilation systems for catering uses on site would mitigate impact and this could again be secured through condition.

- 11.4.9 The residual effects of both the construction and operational phases following mitigation are considered to be negligible and, as with all parts of the Environmental Statement, potential cumulative impact with other developments has been taken into account. Overall and subject to the imposition of appropriate conditions, no significant issues relating to dust and odour are identified.

Loss of light and privacy

- 11.4.10 As much of the northern part of the site is currently used as surface car-parking, the development would result in some loss of light to the properties on the western side of Bonny Street. However, all of these with the exception of the Number 13 pub front onto the Promenade and so would not be unduly affected. The pub currently faces the side of the existing police garage which is around two storeys in height. Whilst some loss of light would occur, this is considered to be acceptable given the commercial use of the premises and the separation distance involved across Bonny Street. The development would sit to the north of the properties facing the site across Chapel Street and so would result in no undue loss of light. The scheme would equally have no undue over-shadowing impact on the Coral Island complex to the north given its commercial character.

11.4.11 The proposed hotel building would sit to the south-west of the properties fronting Central Drive between Hornby Road and Havelock Street. At present this area is clear. The extension to the apartment block would also sit to the west of properties fronting Central Drive to the south of Havelock, and would replace existing structures that are one/two storeys in height. This would result in some over-shadowing. No details of the hotel layout are currently available to enable an assessment of impact on privacy but this could be adequately safeguarded against if appropriate at reserved matters stage. The apart-hotel, however, would overlook the properties on the opposite side of the road. The Central Drive properties include residential uses at upper floor level. At the closest point the separation distance to the hotel, which would be up to six-storeys high, would be just under 16m. The five-storey apart-hotel would be around 18m distant from the affected properties.

11.4.12 The Council usually requires separation distances of at least 21m between the habitable room windows of two-storey properties. Clearly these typical requirements would not be met. However, the increased impact would affect only a few properties and this would be the case for any development of scale on the site that continued the established building lines of the Heritage Quarter frontage. Occupants of the holiday accommodation would not be expected to spend significant amounts of time in their rooms and it is likely that overlooking would be passive and limited. Overshadowing would be limited towards the end of the day. Nevertheless, whilst the impact would be limited, it does weigh somewhat against the proposal in the planning balance.

Impact of wind on pedestrians

11.4.13 The applicant has submitted a Pedestrian Level Wind Microclimate Assessment. This assessment unsurprisingly notes that the site is generally windy with prevailing winds blowing from the west and south-west. This is in part because of proximity to the Irish Sea but also reflects the open nature of the site at present. The study concludes that the proposed development would improve wind impact by introducing blocks and reducing wind speeds. However, some isolated areas, would get windier. These would include the northern side of New Bonny Street and the area along the existing retail units on Central Drive to the east of the proposed hotel. The assessment takes no account of landscaping or mitigation measures.

11.4.14 To reduce the potential impact, a number of mitigation measures are recommended. These include setting the most northerly leisure building further south or stepping sections of the northern frontage. Planting deciduous trees along either side of Bonny Street would also reduce local wind speeds. Introducing a building undercut or stepping the northern elevation of the proposed hotel would also assist the situation on Central Drive as would tree planting around that corner. The outline elements of the proposal should be designed with these issues in mind, and it is recommended that a condition be attached to any permission granted to require a further wind assessment to be carried out concurrent with the submission of a reserved matters application to ensure no unacceptable impact would result.

11.4.15 The report also notes that wind levels would prevent roofs from being used as amenity spaces unless appropriate mitigation were implemented. The full element of the application proposes outdoor amenity space at roof level to serve the apart-hotel rooms proposed in the apartment building. A condition is therefore recommended to require provision of 1.5m high balustrades to be provided to ensure that these areas are usable.

11.5 Transport and movement

Highway capacity and function

- 11.5.1 A Traffic and Transportation technical paper has been submitted as part of the Environmental Statement and a Transport Assessment and Framework Travel Plan are appended to this. The information is considered to be compliant with the relevant Environmental Impact Assessment requirements and has been assessed by the Head of Highways and Traffic Management Services. The Traffic Assessment is considered to be based on appropriate data in terms of predicted visitor numbers. The assessment of likely impact considers factors such as severance, driver delay, pedestrian amenity, fear and intimidation and accidents/safety.
- 11.5.2 During the construction period, severance is not considered to be an issue and driver delay would be negligible. Equally the implications for pedestrians and cyclists would be negligible as would fear of traffic. Highway safety is not identified as a concern. Coach users, however, would be majorly affected as routes and stops could change for over three years. Bus users would only be negligibly affected. Dust and dirt effects would be expected to be negligible/minor. The Construction Environmental Management Plan agreed through condition would provide some mitigation. Appropriate signage to inform drivers and pedestrians would also be required through condition.
- 11.5.3 The operational phase would have a minor impact on Chapel Street through severance but the scheme would generally result in negligible driver delay. Impact on pedestrian/cyclist amenity would be negligible but there would be a minor adverse impact on fear of traffic and on accidents/road safety. The impact on public transport users would be neutral and there would be no expectation of dirt or dust. Agreement and implementation of a Travel Plan would provide mitigation to the impacts of the operational phase as would appropriate signage and the provision of cycle/motorcycle/electric-charging parking spaces. The creation of a link road from Seasiders Way to Chapel Street and a new covered coach station would provide long-term benefits.
- 11.5.4 Again, residual and cumulative impacts have been considered. Subject to the mitigation measures identified, the residual impact of construction would be neutral or negligible adverse with the exception of the impact on coach users who would experience a minor adverse effect. Operationally the scheme would have a minor positive benefit on pedestrian/cyclist amenity and public transport users, but a minor adverse effect on fear of traffic and road safety. Potential cumulative impact with other committed developments in the town has been taken into account and overall these conclusions are agreed.
- 11.5.5 The over-arching requirement is that the transportation network remains legible, effective and resilient through the development process.
- 11.5.6 The commencement of construction of the multi-storey car park would sever the link between Seasiders Way and the existing parking provision on site. This would mean that car and coach traffic would have to leave Seasiders Way at Bloomfield Road to progress north of that point. Similarly, traffic looking to get back to the M55 would only be able to access Seasiders Way/Yeadon Way from Bloomfield Road or Waterloo Road. It will be necessary for diversion routes to be established. Officers are confident that this is possible, but it will require a range of intervention measures including signage and alterations the operation of signalised junctions. The extent and nature of intervention would depend upon the level of

traffic that would need to be diverted. It must be acknowledged that the potential diversion routes may not offer an intuitive solution for motorists and could result in longer journey times and a perception that the resort is challenging to access by car.

- 11.5.7 The number of people for whom the site is the end-destination can be calculated from parking figures. However, because Covid-19 has prevented normal survey work, it is not known how much traffic uses the site as a through route, i.e. how many cars travel down Seaside Way and then use the site to access the wider local network, either to park in other Town Centre car parks such as Houndhill, or to reach other final destinations. This unknown prevents the Council from fully identifying at this stage the necessary diversion routes and the intervention measures that would be required.
- 11.5.8 In addition to the above, the Leisure Quarter Supplementary Planning Document establishes an aspiration for improved modal share of coach travel. It is acknowledged that residual concerns relating to Covid and a corresponding reluctance for communal travel may now make this aspiration more challenging. An assessment of a realistic modal share objective for coach travel should be carried out and measures to achieve the identified target should be presented. This could be secured through condition. This information could impact upon the expected level of traffic that would seek access to the site and therefore needs to be taken into account as part of the wider work to understand traffic levels and flows.
- 11.5.9 The Department for Transport has announced that road traffic levels are now back to more or less normal conditions. As such, it would be possible for appropriate survey work to be carried out now. Ordinarily this would be requested of the applicant. However, and as Members will be aware, construction costs are rising rapidly and this having a recognised impact on the development sector. To delay the current application in order to obtain the necessary traffic information prior to determination would increase financial pressures on the scheme. Ultimately this could impact adversely upon the benefits the scheme could provide.
- 11.5.10 Officers are confident that a solution to the severance of the connection between Seaside Way and the existing car parks in terms of diversion routes can be found without this having an unacceptable impact upon the highway network. As such, and mindful of the need to progress the application, officers are content for pre-commencement conditions to be applied to any permission granted to require the assessment work outlined above to be provided, and the necessary range of diversion implementation measures to be agreed and delivered. The cost of these works would be borne by the applicant and this would be secured through a S278 agreement under the Highways Act.
- 11.5.11 If permission is granted, and once the multi-storey car park is operational, it is not considered acceptable for existing through-traffic using the site to be routed through the car park. A link road between Seaside Way and Chapel Street is proposed as part of phase 3 but this might not be delivered for twelve years or more from the date of decision (ten years to submit for reserved matters approval as requested by the applicant plus two to commence works). It would be undesirable to continue to require through-traffic to access/egress Seaside Way at Bloomfield Road if another solution can be found. It is possible that the Courts building could be reconfigured in such a way as to enable the link road to be delivered earlier in the process. This would naturally require the agreement of HMCTS but should be investigated. A condition is therefore recommended that would require the applicant to consider alternative options to provide a link between Seaside Way and Chapel Street as soon as is practicable.

11.5.12 Coaches currently use the coach station on the application site to drop-off and collect passengers. Access to this direct from Seaside Way would be lost once construction commences and, as with car traffic, diversion routes would need to be found between Bloomfield Road and the site. The development of phase 1 of the application scheme, which is the phase providing the hotel and first indoor theme park after the development of the multi-storey car park, would necessarily result in the loss of the existing coach station. This would need to be relocated on an interim basis until the new coach station on site, proposed as part of phase 3, could be delivered. It is envisaged that an existing parking area to the west of Seaside Way on Central Corridor would be given over entirely to coach parking. A scheme to agree and implement the details of this would be secured through condition. This would displace the existing car parking bring more cars onto the local network, and this would also have to be factored in to the design of diversion routes.

11.5.13 It is envisaged ultimately that, if permission is granted and once the outline element of the scheme comes online, New Bonny Street and the northern end of Central Drive would be restricted to pedestrian, cyclist, bus and taxi traffic only. This would make the area around the northern end of the site more pedestrian friendly and would improve pedestrian connectivity between the site and Town Centre. Car traffic seeking to access the main parts of the Town Centre such as Houndshill would be redirected along Hornby Road, Reads Avenue and Coronation Street. As such, a comprehensive scheme of off-site highway improvement works would need to be agreed and implementation secured through condition.

11.5.14 In addition to the above, further assessment of the peak periods that would exceed parking capacity is required to understand the impact in terms of additional vehicles on the network and parking demand that would be displaced elsewhere. An associated management strategy, to include technology such as variable message signs, would be required and this should be secured through condition. As part of this, full consideration should be given to the creation of a park and ride facility on Central Corridor to meet the displaced parking demand.

Access arrangements

11.5.15 Vehicular access to the areas of the site subject to the full planning application would be taken from Seaside Way into the multi-storey car park, and from Chapel Street and Central Drive to provide servicing for the Heritage Quarter uses. Interim reconfiguration of the existing junctions between the surface car parking and Central Drive and Chapel Street would also be required. The detailed design and delivery of these access points could be secured through condition.

11.5.16 Access is not a matter for consideration at this stage in respect of the outline elements of the proposal, but it is anticipated that points of access would be taken from Chapel Street and Bonny Street. Details could be satisfactorily agreed at reserved matters stage.

11.5.17 With regard to the proposed positions of the access points, national guidance exists in relation to junction spacing. Neither Central Drive nor Chapel Street would comply with this guidance as a result of the development proposed. Officers are confident that overall highway safety could be adequately maintained but this would require the agreement and implementation of a scheme of highway works to these routes. This could be secured through condition.

11.5.18 As such and on balance, the access arrangements proposed are considered to be acceptable.

Parking provision

11.5.19 The acceptability of the parking provision proposed in terms of compliance with planning policy expectations is discussed in section 11.1 above.

11.5.20 The Head of Highways and Traffic Management Services has confirmed that the anticipated loss of car parking on Central Corridor to accommodate the interim relocation of the existing coach park is not a significant concern.

11.5.21 It is inevitable that the construction of the multi-storey car park would result in some loss of car parking on the site. It is estimated that this would be in the region of 150 parking spaces. In the short-term this would increase pressure on existing provision elsewhere which is known to be already in high demand. The impact of this could be alleviated to some extent through provision of signage to inform and guide drivers, but the short-term loss of car parking would nevertheless weigh to some extent against the scheme.

11.5.22 As set out above in paragraph 11.6.8, the Supplementary Planning Document aims to increase the proportion of visitors arrive to the site by coach. If achieved, this would increase demand for coach parking. It is considered that the suggested extension of the coach park into the existing car park on Central Corridor between Princess Street and Rigby Road could accommodate any resultant increase in coach parking demand.

11.5.23 The multi-storey car park is to be operated by Blackpool Council. The layout proposed is considered to be acceptable and to meet general safety and manoeuvrability standards. However, a number of amendments are required to ensure that adequate provision exists for all users and so it is recommended that the final layout of the car park be agreed through condition.

Sustainable and inclusive travel promotion

11.5.24 At least 10% of parking spaces within the multi-storey car park should have appropriate infrastructure and be dedicated for use by electric vehicles. A further 10% should be designated as accessible and/or parent and child spaces. This provision could be secured through condition. Appropriate motorcycle provision would also be required and again a condition is recommended.

11.5.25 Whilst cycle storage is proposed within the multi-storey car park this is currently considered to be inadequate to meet the needs of the scheme as a whole as cycle parking should be dispersed through the development. Ordinarily, cycle parking provision should equate to 10% of total car parking provision which would generate a requirement for around 130 cycle spaces. A mix of long and short-stay cycle parking is required. Long-stay provision should take the form of a secure enclosure or individual bike lockers. Short-stay provision should still be secure but could take the form of cycle stands. All cycle parking should be covered. Short-stay cycle parking should be located close to the main entrances of buildings and be well-lit with a safe, clear route to facilities. The provision of long-stay cycle parking within the multi-storey car park is considered to be acceptable. For long-stay parking, primarily aimed at staff, associated facilities such as lockers, changing rooms and showers should be provided. A condition should be attached to any permission granted to require the quantum of cycle parking for the development to be justified and agreed, and to require the agreement and implementation of a scheme of cycle parking to include details of design and

location.

11.5.26 A Framework Travel Plan has been submitted as part of the application but further work is required. Separate strategies for staff and visitors as well as targets for modal share should be developed. As set out above, a strategy to encourage coach travel should be agreed and implemented and this could be secured through condition. Further consideration of car sharing, public transport discounts and free taxi provision for staff along with arrangements for staff car parking is required as are additional details of implementation and monitoring. A condition should be attached to any permission granted to secure this additional work.

11.5.27 It is recognised that some disruption to bus services may result during construction through delay and relocation of stops or diversion of routes, but this is not considered to weigh notably against the application. Measures would be included as part of the agreed scheme of off-site highway works to minimise this impact.

Pedestrian Connectivity

11.5.28 The Supplementary Planning Document expects the site to have safe and convenient access for all, with strong pedestrian connectivity between the Town Centre, Retail Core and the seaward side of the Promenade. Routes must be attractive and should follow desire lines linking into the holiday streets to the east, Central Drive, Chapel Street and Foxhall village.

11.5.29 The interim relocation of the coach station to Central Corridor would result in passengers being dropped-off or collected to the south of Chapel Street. Those wishing to access the Promenade could do so via the southern side of Chapel Street, but those wishing to access the Town Centre would need to cross Chapel Street and progress northwards. The various options to provide an attractive link between Chapel Street and the Town Centre need to be explored. It may be most appropriate to prevent relocation of the coach station until the multi-storey car park is operational and the former police headquarters building has been demolished. This would enable the creation of a pedestrian route through the site. Such a route could be enclosed by hoardings carrying visuals that promote the development and Blackpool as a whole to make the route inviting and exciting. The hoardings and the exact position of the route could vary over time to accommodate the development of phase 1 in the northern part of the site. It will nevertheless be the case, however, that coach travellers wishing to access the Town Centre will need to cross Chapel Street. A condition should be attached to any permission granted to require agreement of a safe and attractive pedestrian link between the interim coach station and the Town Centre.

11.5.30 The scheme proposes to improve pedestrian connectivity by enhancing Brunswick Street as a physical link between the site and the Promenade. The indicative site layout plans provided show Brunswick Street connecting into an elongated area of public realm between the two indoor theme parks that would sit against the western boundary. This east-west connection would link into a north-south pedestrian thoroughfare running between Chapel Street and the public realm space to the north of the site. This would effectively integrate the site and the areas beyond with both the Promenade and the Town Centre. The proposed improvements to the Central Drive frontage would also improve the eastern boundary as a pedestrian route into town. Long-term, the intended works to make the area around the north of the site more pedestrian friendly would support this improved connectivity, and the way-finding feature proposed in the north-east corner would provide a visual focus for pedestrians. As such it is considered that the final scheme would have a positive impact on pedestrian movement and encourage better integration between the key areas.

11.5.31 These improvements in pedestrian connectivity would also improve accessibility by bus and tram.

Overall impact

11.5.32 The impact of the proposal on the highway network and general accessibility would inevitably vary over time as the development progresses and different elements become operational. Officers have a strong understanding of these various issues and the types of mitigation that would be required to address them. These various mitigation measures would be secured through condition. The conditions would also necessarily require the submission of a significant level of additional information to inform the detailed design of these measures. Ordinarily, this information would be sought prior to determination. However, in this case, as a result of familiarity with the operation of the existing network and the confidence that officers have in the potential for an acceptable solution to be agreed and delivered, it is felt that use of conditions would not prejudice the robustness of the decision-making process.

11.5.33 It is acknowledged that as a consequence of its scale, the construction phase for this development would be lengthy. It is inevitable that a project of this significance would cause a degree of delay, diversion and disruption. This has the potential to cause frustration for local residents and visitors alike, and potentially create a negative perception of Blackpool as a challenging destination to navigate. However, this must be weighed in the planning balance. Once fully operational, the site would be highly accessible by all forms of transport and would link well with the surrounding highway network and key attractions and local destinations. As set out in the preceding sections, it would generate multiple benefits for the resort. On this basis, and as it is considered that adequate solutions can be identified and delivered, the highway and access issues identified are not considered to preclude the development from according with the overall aims and objectives of the Development Plan.

11.6 Flood risk and drainage

11.6.1 A technical paper on flood risk and drainage has been submitted as part of the Environmental Statement and this is considered to comply with Environmental Impact Assessment requirements. The paper notes the existing uses on the site and the fact that land levels increase by approximately 2m from west to east and by a maximum of around 3m from south to north. A swathe of land running across the site from north-west to south-east falls within flood zone 3. The applicant has provided a site-specific flood risk assessment and a drainage strategy as appendices to the Environmental Statement chapter.

11.6.2 During construction, minor adverse impacts would be anticipated from ground and storm water ponding in excavations, potential increase in impermeable areas, excessive ponding leading to increased infiltration to ground, groundworks diverting existing flood routes, and phasing of works and measures. A moderate adverse impact would be expected from pollution through spills or storm water. A Construction Environmental Management Plan to be secured through condition could mitigate impacts by stipulating specific measures to be implemented, and agreement of appropriate surface water drainage and management would also assist. Subject to this mitigation, impact on all counts would be negligible.

11.6.3 Once the development was operational, minor adverse impacts would be expected from overland flows from off-site, the increased development on site and level alterations.

Moderate adverse impacts would result from climate change, increased storm and foul water flow, and pollutant discharge from storm or foul water into the receiving environment including the underlying aquifer. Appropriate mitigation measures are recommended in the submitted flood risk assessment and drainage strategy and these should be secured through condition. The buildings affected by tidal floodwater would either have raised floor levels or would incorporate flood resilient construction and design at ground floor level. Further investigation would be required to safeguard against contamination and again this could be covered by condition. Detailed drainage strategies would need to be agreed through condition for all phases of the development as will use of pollution protection features such as petrol interceptors from parking areas. These mitigation measures would ensure that the development would have a neutral, negligible or minor/moderate beneficial impact on drainage and flood risk once operational. As with the other sections of the Environmental Statement, potential cumulative impacts have been taken into account and no undue issues are identified.

- 11.6.4 In terms of flood risk, as the site is allocated for major leisure and mixed use development through the Core Strategy, and as this document has been subject to a strategic flood risk assessment, the principle of developing on the site is accepted in flood risk terms. Within the site, the hotel accommodation would be positioned so as to avoid flood zone 3. The apart-hotel uses within the Heritage Quarter would also fall outside of flood zone 3. These are the most vulnerable elements of the proposal. It would be possible for the proposed leisure uses to be located to the north-east of the site with the area falling within flood zone 3 primarily used as public realm. However, this would compromise pedestrian flow between the site and the town centre. The location of the leisure uses to the west would reinforce the existing concentration of tourist attractions on the Promenade and accords with the overall character of this area. As such and on balance, it is considered that the sequential test has been sufficiently met.
- 11.6.5 As the application indicates that drinking establishments would be located within flood zone 3, the exceptions test must be passed because these are classified as more vulnerable uses. It is suggested that these uses could be located at upper floor level to lessen flood risk. Further mitigation measures, such as a flood evacuation plan, are proposed in the flood risk assessment and overall it is considered that the development could be made suitably safe from flood risk. Nevertheless, the risk from flooding must be outweighed by wider community sustainability benefits. In this case the site has long been promoted for major redevelopment to drive regeneration and growth of the resort. The development would attract a significant number of new visitors to Blackpool and would generate employment. As such, the wider sustainability benefits are considered sufficient to outweigh the residual flood risk and so the exceptions test is passed.
- 11.6.6 The information submitted, including the detailed drainage plans provided in respect of the full element of the application, has been considered and found to be acceptable by the Council as Lead Local Flood Authority. Proposed land levels would be taken into account as part of the agreement of the drainage strategies for future phases. As such, and subject to conditions that require adherence to the approved plans and the agreement of flood risk and drainage information for future phases, no unacceptable impacts are anticipated.

11.7 Ecology and nature conservation

- 11.7.1 The applicant has submitted a paper on Ecology and Nature Conservation as part of their Environmental Statement. This has been assessed and is considered to comply with the Environmental Impact Assessment requirements. The document has taken into account the

internationally, nationally and county designated sites of ecological importance that could be impacted upon by the development. It has also reviewed the site and concluded that, aside from an area of poor semi-improved grassland which is of local importance, the site is of negligible importance as habitat. The site is, of course, dominated by hard surfaces and is in a busy, central location.

- 11.7.2 Surveys have been conducted in respect of potential for the site to support badgers, bats, nesting birds, otters, great crested newts and other amphibians. The site is considered to be of negligible importance for badgers, otters, water vole, reptiles, great crested newts and other amphibians. The tree/shrubs and buildings on site may offer nesting and foraging habitats for birds and are therefore of local importance. The site does not, however, support any of the species for which the nearby protected sites are designated for. The buildings could be of local importance for bats but the trees/shrubs have negligible potential. A preliminary bat survey has therefore been provided. This concludes that the buildings provide low bat roost potential.
- 11.7.3 The construction phase could have a temporary substantial adverse effect on the Liverpool Bay Special Protection Area through dust impact on water quality. It could also have a permanent minor adverse impact on the semi-improved grassland on site, and on bats and birds through loss of habitat. The Construction Environmental Management Plan to be secured through condition could minimise dust release. The provision of bat boxes and introduction of native species-rich planting and grass verges could off-set the habitat impact. Again this could be secured by condition. Demolition should be over-seen by an ecologist and construction workers should be given a 'toolbox' talk. Demolition/renovation works and vegetation clearance should start in September/October or the absence of nesting birds should be confirmed by an ecologist. Provision of bird boxes should be secured through condition.
- 11.7.4 The operational phase would be anticipated to have a permanent minor adverse impact on habitats, bats and birds. Recommended mitigation would include a habitat management regime to be secured through condition and appropriate positioning of the bat and bird boxes proposed.
- 11.7.5 Subject to the mitigation measures recommended, the residual impacts of construction are generally anticipated to be neutral or negligible, except for on the semi-improved grassland habitat and bats and birds where the impact would be minor beneficial. For the operational phase the residual impacts would also be neutral or negligible. Potential cumulative impact has been taken into account.
- 11.7.6 Natural England has been consulted on the proposal and Greater Manchester Ecology Unit (GMEU) has reviewed the application on behalf of the Council. A Habitats Regulations Assessment to the stage of Appropriate Assessment was requested on the basis that the proposals could affect the Liverpool Bay Special Protection Area, the Ribble and Alt Estuaries Special Protection Area and RAMSAR, and the Ribble Estuary Site of Special Scientific Interest through recreational disturbance. The Habitats Regulations Assessment subsequently submitted is considered to be acceptable and it is recommended that the Council as Competent Authority adopts this assessment. Natural England has been consulted on this information and has confirmed that it has no objection to the grant of planning permission subject to the imposition of appropriate conditions to secure the mitigation identified.

11.7.7 In light of the above, and subject to the imposition of suitable conditions to require agreement of a Construction Environmental Management Plan for each stage of development; impose demolition restrictions; secure bat and bird boxes; secure provision and appropriate maintenance of landscaping and habitat; agree sustainable drainage features; and secure the provision of interpretation boards and information packs for visitors, no ecological impacts that would weigh against the application are anticipated.

11.8 Environmental Quality Impact

Land contamination

11.8.1 A technical paper on ground conditions and contamination has been submitted as part of the Environmental Statement and this is considered to comply with the relevant Environmental Impact Assessment requirements. As the site was previously occupied by the Blackpool Central train station with associated infrastructure, there is potential for land contamination.

11.8.2 The construction process has the potential to cause contamination through fuel storage/spillage and excavation, and place workers at risk of released contamination through contact or inhalation. The agreement of a remediation strategy through condition would provide mitigation, as would the agreement of a Construction Environmental Management Plan to manage the construction process. Subject to these mitigation measures the residual effect of land contamination during construction is anticipated to be negligible.

11.8.3 Once the development is operational the site will be largely hard-surfaced which would significantly reduce potential for contaminant transmission. Gas protection measures may also need to be incorporated and this would be informed by gas monitoring secured through condition. Again, subject to the mitigation measures identified, negligible impact from land contamination is expected.

11.8.4 As with all elements of the Environmental Statement, potential cumulative impacts have been taken into account. Subject to the imposition of appropriate conditions, no negative impacts arising from land contamination either on environmental quality or human health are anticipated.

Air quality

11.8.5 As stated above, a technical statement relating to air quality, odour and dust has been submitted. This is considered to be in accordance with relevant Environmental Impact Assessment requirements. Use of construction machinery, demolition, earthworks, construction activities and traffic exhaust emissions all have the potential to impact on air quality.

11.8.6 During the construction phase the impacts on air quality could be expected to be minor to moderate adverse. However, subject to the development proceeding in line with an agreed Construction Environmental Management Plan, the residual effect would be negligible. The Plan would essentially ensure that best practice methods are followed during construction.

11.8.7 The operational phase of development would be expected to have a minor to moderate adverse impact from on-site combustion plant emissions and a negligible impact from traffic. This could be mitigated against through the agreement of plant details through condition. As a result, the residual effect is anticipated to be negligible. Potential cumulative impacts with other developments have been taken into account.

Water quality

11.8.8 There is an undifferentiated aquifer overlying a secondary aquifer beneath the site but no groundwater abstractions are recorded within 1km. There is shallow groundwater in three locations on the site and Irish Sea is approximately 310m distant. There are no main rivers or other surface water bodies in sufficiently close proximity as to be at risk from contamination.

11.8.9 The potential for pollutant discharge has been considered in the technical paper on drainage and flood risk submitted as part of the Environmental Statement. This is summarised in section 11.6 above. Subject to the imposition of appropriate conditions to require drainage and pollution prevention measures to be agreed and implemented, no undue negative impacts on water quality are anticipated.

11.9 Climate change, waste and sustainable design considerations

Climate change

11.9.1 A technical paper on climate change has been submitted as part of the Environmental Statement. This is considered to comply with the relevant Environmental Impact Assessment requirements. As with all sections of the Environmental Statement, potential cumulative impacts have been taken into account.

11.9.2 During the construction phase, moderate adverse impacts would be expected as a result of carbon emission relating to the removal of raw materials, transport of materials to manufacturing sites, the manufacturing process, transport to the site and works on site. A range of carbon reduction options have been proposed as mitigation. Subject to this mitigation, the residual effects are anticipated to be minor adverse.

11.9.3 The operational phase of development has potential to have high/substantial adverse effects by virtue of on-site energy consumption and life-cycle maintenance. Negligible to minor adverse effects would be expected from reduction in the capacity and energy consumption of heating systems, increase in cooling energy use, increase in drought, resilience of utility infrastructure, instability and drainage system failure. As mitigation, the buildings on site have and can be designed to limit energy use and adapt to changing climatic conditions. Building Energy Management Systems could be secured through condition. A condition could also be imposed to require renewable energy systems to be explored for future phases of the development. Incorporation of green infrastructure and sustainable urban drainage systems could also help to mitigate impacts. Subject to the mitigation measures proposed, residual benefits would range from minor adverse to potential minor benefit if less energy consumption is required for heating, although this would be balanced by a minor adverse impact if more energy were required for cooling.

Waste

- 11.9.4 A technical paper on waste has been submitted as part of the Environmental Statement and this is considered to meet the relevant Environmental Impact Assessment requirements. Potential cumulative impacts have been assessed.
- 11.9.5 It has been estimated that some 33,000 tonnes of waste material would be created during demolition on site. A further 21,000 tonnes of waste would be generated during construction. Some 5,000 tonnes of this would be sent to landfill. Without mitigation, this would have a moderate adverse impact on waste management infrastructure, a minor adverse effect on treatability, a moderate adverse impact on the ability to meet international waste policies/targets, and a minor adverse impact on the ability to conform to local waste policy. A Framework Waste Management Plan should be secured through condition along with Site Waste Management Plans for individual phases. Waste materials should be separated and materials re-used wherever practicable. Subject to this mitigation, residual environmental effects are expected to be negligible.
- 11.9.6 The operational phase of development is anticipated to generate somewhere in the region of 19,600 tonnes of waste per year. This would be expected to have a moderate adverse impact on waste management infrastructure and compliance with international waste targets, and a minor adverse impact on treatability and local waste policy. An Operational Waste Management Strategy should be secured by condition. Again, subject to this mitigation, residual environmental effects are expected to be negligible.

Sustainable design considerations

- 11.9.7 Policy CS10 of the Core Strategy echoes many of the considerations addressed in the Environmental Statement. It expects developments to be designed to reduce energy demand and to incorporate energy efficiency measures and renewable/low carbon energy provision where practical. The policy goes on to require all non-residential developments over 1,000sqm in area to achieve a Building Research Establishment's Environmental Assessment Method (BREEAM) rating of 'very good'.
- 11.9.8 The applicant has submitted an Energy Statement, a BREEAM Site Strategy and a Whole Life Carbon Assessment in support of their application and these are appended to the Environmental Statement Technical Paper 11 on Climate Change. These documents state that at least 15 % of the development's energy requirement would be generated on site through renewable technologies such as air source heat pumps and photovoltaics. Buildings would be designed to allow natural ventilation and have high thermal performance and a framework Travel Plan would be implemented to encourage sustainable travel. The three indoor theme park buildings and the hotel would be expected to reach a BREEAM rating of 'very good' and this could be secured through condition. In total the development is anticipated to emit 45,372 tonnes of carbon dioxide equivalent over its lifetime. This is understood to be around 50% lower than the adopted GLA (Greater London Authority) benchmark.
- 11.9.9 The applicant does not propose to undertake a BREEAM review or rating in respect of the multi-storey car park. This is because the BREEAM rating regime is only intended to apply to occupied buildings. However, consideration has been given to the environmental footprint of the multi-storey car park. The materials proposed would have a long design life and be

recyclable. The entire car park would benefit from natural ventilation. The stair cores would also benefit from natural light and ventilation and artificial lighting would operate on motion sensors to minimise energy use. Electric vehicle charging points are proposed and the building would be designed to accommodate more electric vehicle provision in the future. The structure of the building has been designed to reduce steel use and carbon dioxide production. Green walls were considered but rejected because they are combustible and therefore unsuitable for a multi-storey car park.

Use of brownfield land

11.9.10 The site constitutes brownfield land. Chapter 11 of the National Planning Policy Framework expects the planning system to make effective use of land, and paragraph 120 states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements to meet identified needs. Whilst the application site is allocated in the Local Plan for development, the scheme proposed could not be said to meet an identified social need. Nevertheless, the redevelopment and effective reuse of brownfield land, particularly in such a prominent, central location, weighs clearly in favour of the application.

11.9.11 In light of the above, and subject to the imposition of appropriate conditions, the proposal is considered to be acceptable in relation to climate change, waste and sustainable design.

11.10 Community Considerations

Employment and economic benefits

11.10.1 A technical paper complying with Environmental Impact Assessment requirements on socio-economic impact has been submitted as part of the Environmental Statement. With regard to predicted visitor information, the Environmental Statement has appropriately considered a worst-case scenario to ensure a robust assessment.

11.10.2 It is noted that the construction phase would generate short-term employment and that this would increase economic output (GVA - gross added value) in the short-term. Training and apprenticeship opportunities would be created. In total the construction could generate 51 full-time-equivalent jobs. Indirect and multiplier benefits could increase this to 64 jobs. Of these, 28 are anticipated to be new jobs. This would deliver a net additional GVA of £4.5m per annum. These would all provide minor benefits. The construction phase would also be expected to have a minor positive impact on the local labour market and could reduce the need for commuting. Impact on local services and facilities and wider socio-economic considerations are anticipated to be negligible.

11.10.3 The operational phase would also deliver high socio-economic benefits by increasing visitor numbers and generating both direct employment on site, and indirect employment through visitor spent off site. Supply chain and employee expenditure would also generate employment. In total the scheme is expected to create 474 new full-time equivalent jobs. This would equate to a moderate positive impact. The scheme would also result in a net additional GVA of £27.4m once the site is fully occupied which would deliver a high positive benefit. Moderate positive impacts would accrue from increased business rates revenue and the effect on the local labour market. Minor benefits would be realised through training and apprenticeships and on commuting and migration. There would be a negligible effect on local services and facilities. The scheme would also deliver high wider socio-economic

benefits by improving the image and perceptions of the area, and by attracting new visitors and supporting a year-round economy.

11.10.4 Potential cumulative impact has been taken into account. At construction stage this is anticipated to deliver a minor/moderate benefit at local level through creation of employment, economic output and training. Once operational the cumulative impact has the potential to deliver moderate/high benefit. Overall the scheme is anticipated to generate moderate to major socio-economic benefits. The 2019 Indices of Multiple Deprivation ranked Blackpool as the most deprived local authority area for employment based on rank of average score. The town is third worst in respect of income and ninth worst in relation to education, skills and training. The socio-economic benefits that would be provided by the scheme are therefore considered to weigh significantly in favour of the application.

Human health

11.10.5 A technical paper relating to human health has been submitted as part of the Environmental Statement and this has been judged to comply with relevant Environmental Impact Assessment requirements. Potential cumulative impacts with other developments have been taken into account.

11.10.6 During construction the scheme would have a minor positive benefit by improving employment and economic output and by providing training opportunities. This would also reduce social exclusion which would itself deliver a minor positive benefit. Impact on air quality would be anticipated to have a minor negative effect. The impact on access to open/green/landscaped space would be negligible. The stress that could arise through traffic disruption and delay and impact on public transport access could have a minor adverse impact. The effect of noise and vibration could be negligible/minor adverse, as could impact on emergency services responses and a potential increase in crime such as vandalism. Exposure to workers to nearby hot-food takeaways could also have a negligible/minor adverse health impact. The mitigation measures proposed including the agreement of a Construction Environmental Management Plan would reduce the potentially negative impacts to a negligible residual effect.

11.10.7 The operational phase would also deliver at least moderate health benefits by creating employment, economic output, job security and training; by reducing social exclusion; and through wider benefits on the local economy. The improvement to Blackpool's leisure and recreational activity offer would equally have a moderate/high benefit. The scheme would deliver a moderate benefit by improving access to open/green/landscaped space. Improvements to accessibility would also deliver minor benefit. Impact on public transport access would be neutral. Negligible/minor adverse effects could result from loss of air quality and from odours, noise and vibration generated on site, but this would become neutral subject to the mitigation measures outlined previously in this report. The visual improvements and opportunities for social congregation would deliver moderate health benefits. Potential delay to emergency services response could have a negligible/minor adverse impact, although the increase in natural surveillance to deter crime could result in a negligible/minor benefit. The provision of a high-quality food and beverage offer rather than hot-food takeaways could have a minor benefit.

11.10.8 Overall, at worst the scheme is anticipated to have negligible or minor adverse impacts on human health with negligible environmental impact. The 2019 Indices of Multiple

Deprivation ranked Blackpool as the most deprived local authority area nationwide for health based on rank of average score. As such, any potentially negative impact on health would weigh against the proposal in the planning balance. However, the Environmental Statement considers the worst case scenario. As such, and given the limited extent of adverse impact, this reduces the weight to be attached to this consideration.

Crime and safety

- 11.10.9 The development would generate risks of crime and anti-social behaviour that must be mitigated against. A condition should be attached to any permission granted to require a security strategy to be agreed for each phase of development. This would need to cover provision of CCTV, security lighting, signage, alarms, appropriate materials and access controls. It should also set out measures to prevent anti-social behaviour such as use of anti-graffiti paint and features to discourage skateboarders and rough-sleepers. The strategy must also set out how threat of suicide attempt would be minimised, particularly for the multi-storey car park which would be publicly accessible to all levels. This should be achieved through installation of a 2.5m high anti-climb barrier.
- 11.10.10 The scale and nature of the use, and the intention to use the public realm area for events would make the site a potential target for terrorism. Anti-terrorism measures for each phase of development would need to be secured by condition. These should include street furniture designed to withstand vehicle strike whilst being of a high standard of design to enhancing the appearance of the site.

Community considerations

- 11.10.11 The severance of the connection between Seaside Way and the application site would mean that all vehicular traffic would have to access/egress Seaside Way at Bloomfield Road or Waterloo Road and use local routes to access their destinations. This has the potential to introduce new traffic, congestion and noise into some of the most deprived areas of the town. However, this negative impact is likely to be balanced by benefits to local shops and services from increased through-traffic.
- 11.10.12 The proposal would retain use of the ground floor of the King Edward VII public house as a drinking establishment, although it may change in character and operation and include a greater element of food. Nevertheless, this would not raise a conflict with Policy BH19 of the Local Plan.

11.11 Overall review of Environmental Impact Assessment

- 11.11.1 The Environmental Statement has been reviewed in terms of compliance with the relevant regulations by a consultant on behalf of the Council. Each technical chapter covers the requirements set out in the scoping opinion issued by the Council. Appropriate methodologies have been used in accordance with industry best practice. The geographical and topical extent of consideration on all topics reasonable. The significance of each impact has been calculated with due consideration to magnitude of effect, likelihood of impact, the sensitivity of the receptor and the confidence level informing the conclusion. Each section considers alternative options and potential cumulative impacts with other developments.

11.11.2 The majority of potential environmental impacts and their effects following mitigation are assessed as neutral, negligible or minor adverse. As such they are not significant. The likely environmental effects during construction would be temporary and could be suitably mitigated, principally through the agreement of a Construction Environmental Management Plan. Subject to mitigation, the vast majority of effects of the operational phase would not be significant in Environmental Impact Assessment terms. Some would be major beneficial effects such as job creation and economic output, and the significant number of new visitors that would be attracted to the resort. This is considered to carry particular weight given the deprivation levels in Blackpool.

11.11.3 Overall, the conclusion of the Environmental Statement is agreed and, subject to the mitigation identified, none of the effects identified should prevent planning permission from being granted.

11.12 Overall sustainability and planning balance appraisal

11.12.1 Sustainability comprises economic, environmental and social components.

Economic considerations

11.12.2 Economically, the scheme would redevelop and regenerate a strategically important site in the middle of the resort within the defined Town Centre and Resort Core. It would attract a substantial number of visitors, including a significant number of new visitors to Blackpool. Given its scale and the fact that it would be an indoor attraction, the development would be expected to deliver a more year-round tourist attraction that would help stabilise current seasonal peaks. In addition, the mix and nature of uses proposed would potentially attract a new demographic of more affluent visitors to Blackpool. Officers are satisfied that, subject to the imposition of conditions to require details to be agreed, the proposal would be sufficiently different to the existing resort offer to be a complementary attraction that would not undermine existing operations. The leisure elements of the scheme would increase spend in the resort and, overall, would have a significantly beneficial impact. Although the development itself would likely be of more regional than national significance, it would nevertheless enhance and support the role of the wider resort as a tourist destination of national importance.

11.12.3 Relevant planning policy aspires to a development of national importance on the wider, allocated Leisure Quarter site. Additionally, Policy CS20 is only permissive of partial development of the allocation where the scheme proposed would meet the objectives of the Supplementary Planning Document. The regional rather than national significance of the development would therefore conflict to some extent with adopted policy. However, this concern must be balanced against the acknowledged challenges to site assembly and the recognition that the Council has been trying to deliver this site for redevelopment for well over 20 years without success. The scheme as a whole would deliver significant benefits that would have a knock-on effect to existing attractions and accommodation, attract new visitors and improve perceptions of the resort. It could reasonably be expected to act as a catalyst for further investment and development. This would support the Council's aim to re-establish Blackpool as the nation's premier seaside tourist destination. These benefits weigh significantly in favour of the proposal.

11.12.4 Subject to the imposition of appropriate conditions, it is considered that the quantum and quality of hotel accommodation on site could be controlled sufficiently to meet the

requirements of policy. Again, subject to conditions, the retail floor space proposed on site is considered to be justified and no significant adverse impacts on the vitality and viability of the defined Town Centre Principal Retail Core or the Central Drive Local Centre are anticipated. Sufficient car parking would be provided on site to help meet the requirements of the Town Centre.

11.12.5 A significant number of new jobs and skills would be generated during both construction and operational phases. This would support increased spend in the town and generate economic output. This weighs significantly in favour of the scheme.

Environmental considerations

11.12.6 Environmentally, it is considered that biodiversity value and environmental quality could be adequately safeguarded through use of conditions. A suitable drainage solution for the site could equally be developed and implemented. The scheme would make efficient and beneficial use of brownfield land and this weighs notably in favour of the scheme.

11.12.7 With regard to impact on climate change, it is acknowledged that this is a relatively new topic area and that it is inherently difficult to predict likely effects because of the uncertainties involved in forecasting. Any detrimental impact on climate change is significant, but it is likely that any development of the scale proposed, that met the brief for the site, would have a comparable impact on climate change. Nevertheless, this impact must weigh negatively in the planning balance. The scheme has been designed to minimise waste as much as is practicable and use recycled or recyclable materials wherever possible. Subject to conditions, the approach to waste on site is considered to be acceptable.

11.12.8 A sustainable design approach has been taken in respect of the development which would make best use of natural light and ventilation in the multi-storey car park. The historic nature of the Heritage Quarter buildings would preclude significant adaptation to minimise environmental footprint. The buildings proposed as part of the outline element would also be expected to incorporate sustainable features and use of low energy or renewable energy technologies would be secured through condition if found to be practicable. It is likely that the scheme would be largely dependent upon private car use. However, electric vehicle charging points and a Framework Travel Plan would also be secured to limit environmental impact. The applicant will also be required to explore options to increase the modal share of coach travel. Together these measures and this approach are considered to weigh in favour of the scheme.

11.12.9 In terms of visual impact, the scheme has been designed to maintain and enhance strategic views of our iconic Blackpool Tower. On the proviso that the development would achieve the high standards assumed in the application and indicated in the Statement of Intent, it would have an overall positive visual impact on the townscape and on key views including those from the Tower and Promenade, and on the approach in from Seaside Way. It is considered that an appropriately high-standard of design for those elements covered by the outline application could be secured at reserved matters stage. The alterations proposed to the Heritage Quarter building are welcomed and would significantly improve the appearance of these buildings which would make a strong, positive contribution to the immediate street scene. The opportunities to extend the illuminations into the scheme and incorporate 'experience' lighting such as light projections and interactive installations would create an exciting and engaging environment for users. These positive visual impacts weigh significantly in favour of the application.

11.12.10 The multi-storey car park is, by its nature, a large, functional building of bulky massing. Whilst some effort has been made to introduce visual interest through material detailing, the building would not meet the high standard of design sought by planning policy. The northern elevation in particular would be largely blank although it is acknowledged that the proposed hotel development would provide screening in future years. The southern elevation is the first element of the Blackpool Central scheme that visitors would encounter on their approach into the site. The design offers little to excite or engage other than signage. Despite the potential for lighting to introduce visual interest during hours of darkness or low-light, the design of the multi-storey car park is nevertheless considered to weigh notably against the application.

Social considerations

- 11.12.11 Socially, the scheme would generate a significant number of jobs and improve skills. Furthermore, given the year-round nature of the attraction, these jobs are likely to be more stable than those typically generated in the tourism sector. Given deprivation levels related to skills, employment and income in Blackpool, this consideration weighs strongly in favour of the application.
- 11.12.12 In terms of health, it is acknowledged that some detrimental impacts could result, but that these could be largely balanced by benefits derived through economic prosperity. The submitted Environmental Statement is required to consider impact on a worst-case scenario and so has identified a negligible or minor adverse impact overall. In terms of planning balance, this must weigh negatively but to a limited extent.
- 11.12.13 Despite mitigation, noise and vibration are anticipated to have a moderate to high adverse impact during construction. Odour during construction could also have a detrimental impact and dust is likely to have a minor to moderate impact. This is to be expected with a development of this scale given the activities on site. It would be limited to the construction period but, as this is a phased development, this could last for a number of years. These impacts weigh notably against the application. During the operational phase of development it is anticipated that unacceptable impacts could be avoided subject to conditions. The mitigation measures proposed would also prevent wind from having an undue impact on users of the site and immediate vicinity. Overshadowing and loss of privacy for the residential accommodation fronting Central Drive to the east of the site would further weigh against the proposal once the development were delivered.
- 11.12.14 Subject to the imposition of appropriate conditions, it is considered that the development can be made suitably safe from crime, anti-social behaviour and terrorist attack. Measures could be secured to minimise risk of suicide attempt. Whilst there may be some inconvenience to the local community through works on site and diversion of traffic, this is not considered to weigh substantively in the planning balance.
- 11.12.15 The challenges of adequately assessing the likely impact of the proposal due to the impact of Covid on data collection mean that a significant amount of work remains to be done in order to ensure that the function and safety of the local highway network could be maintained. However, officers are of the view that a suite of adequate solutions can be identified in order to safeguard highway safety and function. These solutions would be secured through condition. As set out above, given officer confidence, it is not considered that this intended approach would undermine the robustness of the decision-making

process. Flood risk has been appropriately addressed through the application and the imposition of conditions is considered to be sufficient to safeguard future users and prevent an increase in flood risk off-site.

11.12.16 The scheme would bring the former King Edward VII picture house back into beneficial use and, in doing so, would restore and safeguard this Grade II Listed Building. As this building is currently in a state of disrepair and at risk of further deterioration, and as its statutory listing establishes it as an asset of national significance, this weighs significantly in favour of the scheme. The improvement and re-use of the remaining Heritage Quarter buildings which are locally listed heritage assets of local importance also weighs in favour of the application.

Overall planning balance appraisal

11.12.17 The assessment set out above has sought to discuss and evaluate the various aspects of the scheme and the impacts that would arise. It is, inevitably, a summary of the most pertinent considerations. Any scheme of this scale, which comprises a range of different uses, on a site of strategic importance that is subject to a long-standing planning allocation, will present a range of beneficial and adverse impacts. It is for the decision-maker to assess these impacts, assign weight to the different competing material planning considerations, and thereby come to a reasonable overall assessment of the planning balance.

11.12.18 The allocated site is in a key location at the end of the main arterial route into the town. It is the southernmost part of the defined Town Centre and fronts onto the 'Golden Mile' stretch of the Promenade which represents Blackpool's shop window. Consequently, the planning policy relating to the site is rightly ambitious in its aims and objectives. However, given the various challenges at play, the Council has been striving to secure redevelopment of the site without success for over 20 years. This is the only scheme to have reached the point at which contracts have been exchanged and signed to secure development subject to planning permission being granted.

11.12.19 It is considered that, on the available evidence, the benefits that would be delivered by the proposal would be considerable in terms of increased visitor numbers, job creation and enhanced economic output. The scheme has the potential to significantly uplift perceptions of the resort and act as a catalyst for further investment and development. It would help to consolidate Blackpool's position as the nation's premier holiday destination. As such, it meets the fundamental objectives of the Development Plan to support wider resort regeneration and growth. Whilst the proposal may in itself fall short of national significance, and may not secure redevelopment of the entire allocated site, these shortcomings are considered to be demonstrably outweighed by the benefits that would accrue.

11.12.20 The detrimental impacts of the scheme that cannot be overcome through mitigation principally relate to climate change; health; noise, vibration and dust, and overshadowing. Although these concerns must be duly weighed in the planning balance, it is highly likely that any scheme of the scale proposed would result in similar adverse impacts, particularly during construction. The suite of conditions that are proposed to be attached to any permission granted would secure a range of mitigation measures that would prevent or minimise the majority of potential negative impacts identified in the assessment above.

11.12.21 Based on the information submitted, and subject to details being agreed at reserved matters stage, it is considered that the development overall would have a positive visual impact. It would safeguard strategic views of the iconic Blackpool Tower and present an

exciting arrival point for visitors. The site would likely be the first point of contact for many visitors with the resort and scheme proposed should establish a strong, positive perception of the town as a tourist destination. The proposed retention, refurbishment and reuse of the Heritage Quarter buildings equally weighs positively in the planning balance.

11.12.22 The design of the proposed multi-storey car park falls short of the expectations for the site. Whilst the unavoidable constraints presented by the use and nature of the building are accepted, the scheme submitted fails to fully take advantage of the opportunities available to deliver a high quality building that engages and excites the viewer and sets the standard for future development. Landscaping, illumination and the approach taken to future phases could offset this impact but it nevertheless weighs against the scheme. However, this detrimental impact is considered to be outweighed by the benefits identified.

11.12.23 In light of the above, and on balance, the scheme is considered to represent sustainable development and be sufficiently in accordance with the aims and objectives of the Development Plan for planning permission to be granted.

11.13 Other considerations

11.13.1 The application has been considered in the context of the Council's general duty in all its functions to have regard to community safety issues as required by section 17 of the Crime and Disorder Act 1998 (as amended).

11.13.2 Under Article 8 and Article 1 of the first protocol to the Convention on Human Rights, a person is entitled to the right to respect for private and family life, and the peaceful enjoyment of his/her property. However, these rights are qualified in that they must be set against the general interest and the protection of the rights and freedoms of others. This application does not raise any specific human rights issues in this regard.

11.13.3 Article 14 states that all of the rights and freedoms contained in the Human Rights Act must be protected and applied without discrimination. Article 14 requires there be no discrimination in the application of human rights on any ground.

11.13.4 Through the assessment of this application, Blackpool Council as a public authority has had due regard to the Public Sector Equality Duty ("PSED") under s.149 of the Equality Act and the need to eliminate unlawful discrimination, advance equality of opportunity between people who share a protected characteristic and those who do not, and to foster or encourage good relations between people who share a protected characteristic and those who do not. The Council does not consider that the development proposed would result in discrimination or inequitable access or treatment on the basis of the protected characteristics of any category of person. Paying due regard to the Public Sector Equality Duty, the Council does not consider that the grant of planning permission would breach its duty.

12.0 LEGAL AGREEMENTS

12.1 An agreement under section 278 of the Highways Act would be required in order to secure necessary off-site highway works including the provision of a signage strategy to mitigate the closure of the link between Seasiders Way and the site. Conditions would be attached to any permission granted to establish what this agreement would need to secure.

13.0 FINANCIAL CONSIDERATIONS

- 13.0 The scheme would generate business rates income but this is not a planning consideration and should be afforded no weight in the planning balance.

14.0 CONCLUSION

- 15.1 The development proposed is considered to represent sustainable development. On balance the scheme is considered to comply with the overall aims and objectives of the Development Plan. No other material considerations have been identified that would outweigh this view. As such, planning permission should be granted.

15.0 RECOMMENDATION

- 15.1 In light of the above, Members are respectfully recommended to adopt the Habitats Regulations Assessment (HRA) prepared in respect of the proposal. Subject to the adoption of the Habitats Regulations Assessment, Members are further recommended to support the proposal and grant planning permission for the development both in full and in outline as appropriate for the relevant elements of the application.
- 15.2 It is recommended that any planning permission granted be subject to a suite of conditions that will be provided as part of the update note prior to the Committee meeting.