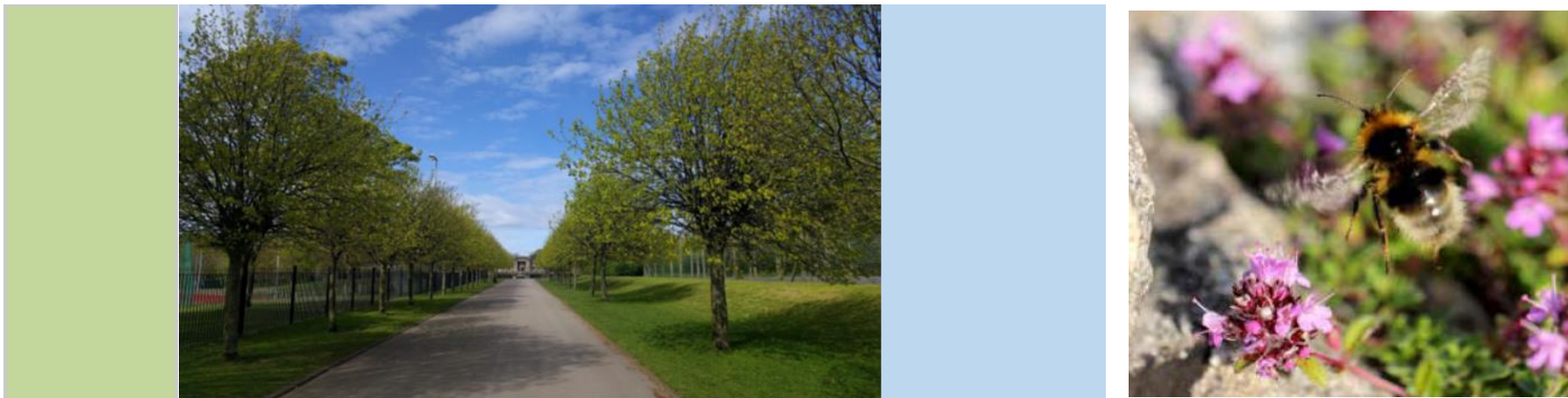


Greening Blackpool

Supplementary Planning Document

Consultation Statement

March 2022



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1.0 Introduction

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

2.0 Overview of the Consultation Responses

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

Table 1: List of Respondents

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

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

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

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

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

Table 2 - Representations received during consultation September – October 2021

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix A: Consultation Material

Figure 1: Social media notices



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

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

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

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Be the first to comment on this

Figure 2: Webpage

The screenshot shows the Blackpool Council website. At the top, there is a dark blue navigation bar with links for Accessibility, Sitemap, Contact us, A to Z, and Keep updated. A 'listen' button is on the right. Below this is a purple header with the Blackpool Council logo and navigation links for Residents, Business, The council, and Visitors. A search bar is also present. The main content area has a breadcrumb trail: Home > Residents > Planning environment and community > Planning > Planning policy > Greening Blackpool. A house icon with dimensions is on the left. The title 'Greening Blackpool' is in large purple font, with 'Last Modified September 09, 2021' below it. To the right are social media and print icons. The 'Current Consultation' section states that consultation on the Greening Blackpool SPD commenced on 6 September 2021 and ends on 18 October 2021, 5.00pm. The 'Background' section explains that green infrastructure is a network of multifunctional green space and that Blackpool has a shortage of it, particularly in the Inner Area and Town Centre. It also mentions that the Greening Blackpool SPD provides direction on the importance of fully considering landscaping and green infrastructure in new development. At the bottom, there are links for 'Greening Blackpool SPD Consultation Draft (September 2021) [PDF 0.85MB]' and 'Comments Form [PDF 0.35MB]'. A 'Back to top' link is at the bottom right.

Figure 3: Comments Form

Draft Greening Blackpool SPD
Comments Form –September 2021



Draft Greening Blackpool SPD – Consultation Comments Form

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

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

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

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

Contact Information

You must provide a contact name and address.

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

1

Draft Greening Blackpool SPD
Comments Form –September 2021

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

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

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

Continue on a separate sheet/expand box if necessary

2

Draft Greening Blackpool SPD
Comments Form –September 2021

Draft Greening Blackpool SPD
Comments Form –September 2021

Declaration

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

Signature:	Date:
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[Email Form](#)

Figure 4: Email sent to consultees

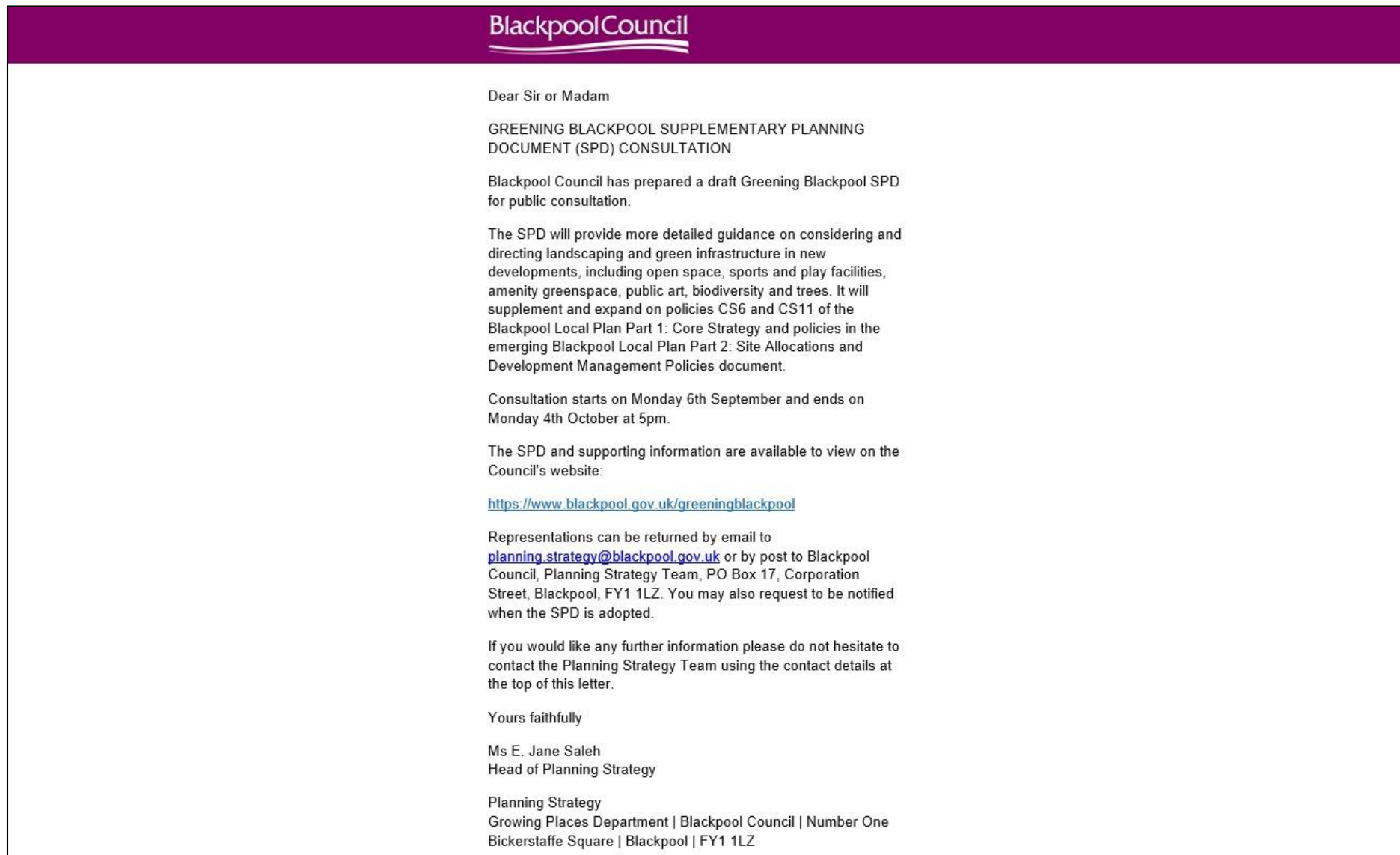


Figure 5: Letter sent to consultees without an email address



Appendix B: Specific (Statutory) and General Consultees notified

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

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

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

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

