

# Public Document Pack

# Blackpool Council

27 October 2023

To: Councillors Benson, N Brookes, Burdess, Farrell, Hobson, Hugo, M Smith, Taylor and Williams

The above members are requested to attend the:

## EXECUTIVE

Monday, 6 November 2023 at 6.00 pm  
in Committee Room A, Town Hall, Blackpool

## A G E N D A

### 1 DECLARATIONS OF INTEREST

Members are asked to declare any interests in the items under consideration and in doing so state:

(1) the type of interest concerned either a

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

and

(2) the nature of the interest concerned

If any member requires advice on declarations of interests, they are advised to contact the Head of Democratic Governance in advance of the meeting.

### 2 FINANCIAL PERFORMANCE MONITORING AS AT MONTH 5 2023/24 AND MEDIUM TERM FINANCIAL PLAN 2024/25 - 2026/27 (Pages 1 - 68)

To report the level of spending and exposure against the Council's Revenue budgets and reserves and balances for the first 5 months to 31 August 2023. The report also includes an update on the Medium Term Financial Plan 2024/25 – 2026/27.

### 3 TREASURY MANAGEMENT HALF-YEARLY PROGRESS REPORT TO THE 30 SEPTEMBER 2023 (Pages 69 - 92)

The Treasury Management Half-Yearly Progress Report for the six months to 30 September 2023.

**4 MARTON MOSS NEIGHBOURHOOD DEVELOPMENT PLAN - ADOPTION (MAKING) OF THE NEIGHBOURHOOD PLAN** (Pages 93 - 180)

To note the outcome of the Referendum on the Marton Moss Neighbourhood Plan and recommend to Council to adopt the Marton Moss Neighbourhood Plan.

**5 ELECTRIC VEHICLE CHARGING IN BLACKPOOL - FUNDING SUBMISSION**

To present a potential submission for Local Electric Vehicle Infrastructure funding for approval.

**Venue information:**

First floor meeting room (lift available), accessible toilets (ground floor), no-smoking building.

**Other information:**

For queries regarding this agenda please contact Lennox Beattie, Executive and Regulatory Manager, Tel: (01253) 477157, e-mail [lennox.beattie@blackpool.gov.uk](mailto:lennox.beattie@blackpool.gov.uk)

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<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Steve Thompson, Director of Resources
<b>Relevant Cabinet Member:</b>	Councillor Lynn Williams, Leader of the Council
<b>Date of Meeting:</b>	6 November 2023

## **FINANCIAL PERFORMANCE MONITORING AS AT MONTH 5 2023/24 AND MEDIUM TERM FINANCIAL PLAN 2024/25 – 2026/27**

### **1.0 Purpose of the report:**

1.1 To report the level of spending and exposure against the Council’s Revenue budgets and reserves and balances for the first 5 months to 31 August 2023. The report also includes an update on the Medium Term Financial Plan 2024/25 – 2026/27.

### **2.0 Recommendation(s):**

2.1 To note the report.

2.2 To require the respective directors, Chief Executive and Director of Resources to continue to closely monitor and manage service financial and operational performances, specifically the social care services.

2.3 To prompt the Scrutiny Leadership Board to continue to independently review the financial and operational performances of Council services.

2.4 To continue to lobby central government (Department for Levelling Up, Housing and Communities, Department for Health and Social Care and Department for Education in particular) along with local authority peers and networks and the Local Government Association for the funding necessary to cope with the burdens and demands presenting as a result of exceptional inflationary pressures and demographic demands upon statutory services.

2.5 To continue to work towards target working balances of £6m by 31 March 2024 rising to £8m by 31 March 2025.

**3.0 Reasons for recommendation(s):**

3.1 To ensure financial performance against the Council’s Revenue Budget and its reserves and balances is kept under timely review by members.

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

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

4.0 Other alternative options to be considered:

None.

**5.0 Council Priority:**

5.1 The relevant Council Priority is: “The economy: Maximising growth and opportunity across Blackpool”.

**6.0 Background Information**

**6.1 Introduction and Context**

Over the 13-year period 2011/12 – 2023/24 cumulative Revenue Budget savings amounting to £218.0m have been required to be made by Blackpool Council in order to balance its Revenue Budget each year. This is greater than the Council’s current annual Net Requirement Budget of £176.2m and even more starkly the compound effect over the same period amounts to nearly £1.6bn of resource that has been removed from the Blackpool economy. This reflects one of the highest reductions per head of population across local authorities in England and in an environment of growing demand upon services as befalling an authority with such recognised pockets of significant deprivation.

The principles of the Medium-Term Financial Sustainability Strategies 2016/17 - 2021/22 and 2021/22 - 2026/27 have been used to successfully keep pace with and deliver budget savings plans year after year. However, in tandem the soaring demand for child protection services and adult social care provision plus the rising costs of providing such care are still creating a burden that current levels of local taxation and Government funding struggle to meet. In addition, the financial consequences of Covid have been material (£3.16m in 2020/21 and £2.59m in 2021/22 both net of Government grants) with little prospect now of any further Government financial support.

The last 13 years have seen unprecedented volatility within local government finance: 9 years of successive central government funding cuts between 2011/12 – 2019/20 were followed by the United Kingdom’s exit from the European Union, 2 years of a global pandemic with legacy consequences and a war within the European continent whilst a promised Fair Funding Review has now been delayed by a decade. Indeed the most favourable social care grants currently receivable are based on a relative needs formula of 2013 which themselves are based on 2001 census data. This has all conspired to produce a perfect storm of labour and supply shortages, pay demands, excessive inflation, continually rising interest rates in the Bank of England’s attempt to stem the pressure and a central government funding system that is decades out of synchronisation. During this period the Council has strived to i) deliver its annual budget in line with statutory requirements; ii) maintain its reserves and balances at stable and appropriate levels that reflect the risk environment; iii) consistently fund and deliver the ambitions of successive administrations; and iv) deliver for the people of Blackpool. However, here in the present, sector experts and economic commentators cannot agree how and when these key drivers of the economy will land, which makes medium-term financial planning and financial management extremely challenging.

When the Revenue Budget for 2023/24 was approved by Council on 22 February 2023, realistic service budgets had been agreed and set, an achievable budget savings plan was in place, reasonable levels of working balances and earmarked reserves were available and the medium-term outlook was as favourable as it had been for some time with additional Government support for social care funding having been announced. However, within weeks local government employers had made a pay offer at nearly three times that provided within the Budget, non-pay inflation remained stubbornly high with June CPI at 7.9% and RPI at 10.7% though welcome reductions being seen in electricity and gas costs, the more costlier social care cases experiencing growing demand, the base rate increasing (for the 14th consecutive time in August) and inevitable consequential pressures emerging from some of the Council’s capital schemes.

- 6.2 This report sets out the summary revenue budget position for the Council and its individual directorates for the first 5 months of 2023/24, i.e. the period to 31 August 2023, together with an outlook for the remainder of the year. The report is complemented with an assessment of performance to date of balances and reserves, income collection, the Council’s latest Capital Programme and statements relating to Cash Flow Summary and Balance Sheet Summary. It also incorporates the impact of the Council’s wholly-owned companies for which the Council is parent company and underwriter.

Separate reports have been prepared for each of the Council’s core areas of responsibility:

- Appendix 2b - Chief Executive
- Appendix 2c - Governance and Partnership Services
- Appendices 2c/d - Ward Budgets
- Appendix 2e - Resources
- Appendix 2f - Communications and Regeneration
- Appendix 2g - Strategic Leisure Assets
- Appendix 2h - Growth and Prosperity
- Appendix 2i - Community and Environmental Services
- Appendix 2j - Adult Services
- Appendix 2k - Children's Services
- Appendix 2l - Public Health
- Appendix 2m - Budgets Outside the Cash Limit
- Appendix 2n - Housing Revenue Account
- Appendix 2o - Wholly-owned Companies

These incorporate summary financial statements which continue to be prepared on a full accruals basis and focus on the forecast revenue outturns for 2023/24. There is an accompanying narrative to explain any areas of significant variance from budget and to highlight any areas of potential pressure along with action plans agreed with service managers to address them.

The combined effect of the directorates' financial performances is aggregated in a summary financial statement at Appendix 2a which mirrors the Council's Revenue Budget Book. This summary allows proactive month-on-month monitoring of the Council's forecast working balances to be undertaken to ensure appropriate and prudent levels are maintained.

### 6.3 **Budget Performance**

At its meeting on 8 November 2021 the Executive approved the Medium-Term Financial Sustainability Strategy for 2021/22 to 2026/27. As part of the Strategy it was agreed that due to the current level of financial risk and volatility the roll forward of service budget under and overspends is suspended in order that finances can be managed more strategically at corporate level. The exception to this related to any underspend in respect of the scheme commitments on Ward Budgets, however because 2023/24 is an election year there will be no carry-forward in accordance with an earlier overriding Executive decision.

The full-year forecast position at this stage of 2023/24 shows a deterioration in the Council's financial standing when compared with the estimated draft unaudited position as at the close of 2022/23 which showed working balances of £2,459k. Working balances are expected to fall to a surplus of **£1,931k** by the end of 2023/24 after taking account of the budgeted transfer of £4,335k to working balances. Plans are being developed to address the in-year pressures identified in this report with

fortnightly meetings held between the Chief Executive, Director of Resources and respective directors of the more pressured services.

The Council’s Revenue Budget for 2023/24 set a target level of General Fund working balances of around £6m. It is deemed appropriate to maintain this target level of £6m for working balances for the medium term and to continue to work towards target working balances of £6m by 31 March 2024 rising to £8m by 31 March 2025.

The impacts of directorates’ revenue budget performance and progress in achieving planned savings fall upon the Council’s working balances. The main areas accounting for the month 5 forecast overspend of **£4,863k** for 2023/24 are summarised below:

Directorate	Service	Forecast Variance £000
Children’s Services	<p>An overspend of £6,002k is forecast. The full-year impact of the Children’s Social Care pressures as at M7 2022/23 has been rightsized as part of the Corporate Medium Term Financial Plan, equating to an additional budget of £5,221k allocated in 2023/24. However, Children’s Social Care Placements is forecasting an overspend against this increased budget of £5,243k, mainly due to new-to-care placements being higher than those exiting care and the additional support required following the breakdown of high-cost placements. The actual number of residential placements as at 31 August 2023 is 74 with this forecast to reduce to 68 by 31 March 2024, whereas the plan suggested there would be 69 as at 31 August 2023 reducing to 60 by the end of March 2024. There was also an additional savings target of £1,924k, of which only £1,165k is anticipated to be met this financial year, leaving a further budget gap of £759k.</p> <p>However, the number of Children in Care continues to reduce and currently sits at 541 children. This brings Blackpool from a rate of 218 per 0-17 10,000 population to 194. The ambition is to bring ourselves in line with comparator Local Authorities over the next couple of years and we are confident that this ambition will be realised. Officers have seen this reduction as a result of reduced entry into care, and increased numbers exiting our care system. Within the cohort of Children Looked After, the Council has had a higher than national average</p>	6,002

	<p>of children in residential placements. Residential settings, for most children, are not the optimum placement and these children do not usually have the same degree of positive outcomes as children in foster placements, or family placements for example. Residential placements are costly, with unit costs rising year on year by 14.1%. We have seen movement in the numbers of residential placements, from 84 to 74 because of a focused, ongoing piece of work led by our newly recruited Head of Service for Supporting our Children. We have reviewed a number of care plans and as a result children have been moved from residential settings to settings that better meet their needs, always ensuring their safety and individual needs are at the forefront when planning.</p> <p>The service has additionally seen a reduction in agency social work staff during the last 12-18 months. In 2021/22 the service had rates of up to 40% agency staff in some teams. A refreshed Workforce Strategy, overseen by a Workforce Board, chaired monthly by the Director of Childrens Services, has seen a reduction of agency staff to under 15% across the social care teams. The national average is now 17% and regionally the rate is much higher. The last set of regional data put Blackpool at the lowest for agency rates. Officers continue to monitor this closely in a challenging and competitive market.</p>	
Adult Services	<p>An overspend of £3,490k is forecast. Adult Commissioning Placements is forecasting an overspend of £3,574k. There are savings shortfalls of £1,012k from the proposal in which the Integrated Care Board (ICB) were expected to provide additional income of £1.6m into the Better Care Fund (BCF) and a further shortfall on additional funding streams of £337K. There is a pressure of £1,313k in Supported Living due to additional packages of care including children’s transitions, along with £521k of pressures due to additional packages of short-term care linked to hospital discharge. An increased number of complex case packages have also created a pressure of £64k. £439k pressures relates to Out of Area Residential and Nursing Placements fee uplifts being significantly greater than forecast offset by £213k additional client</p>	3,490



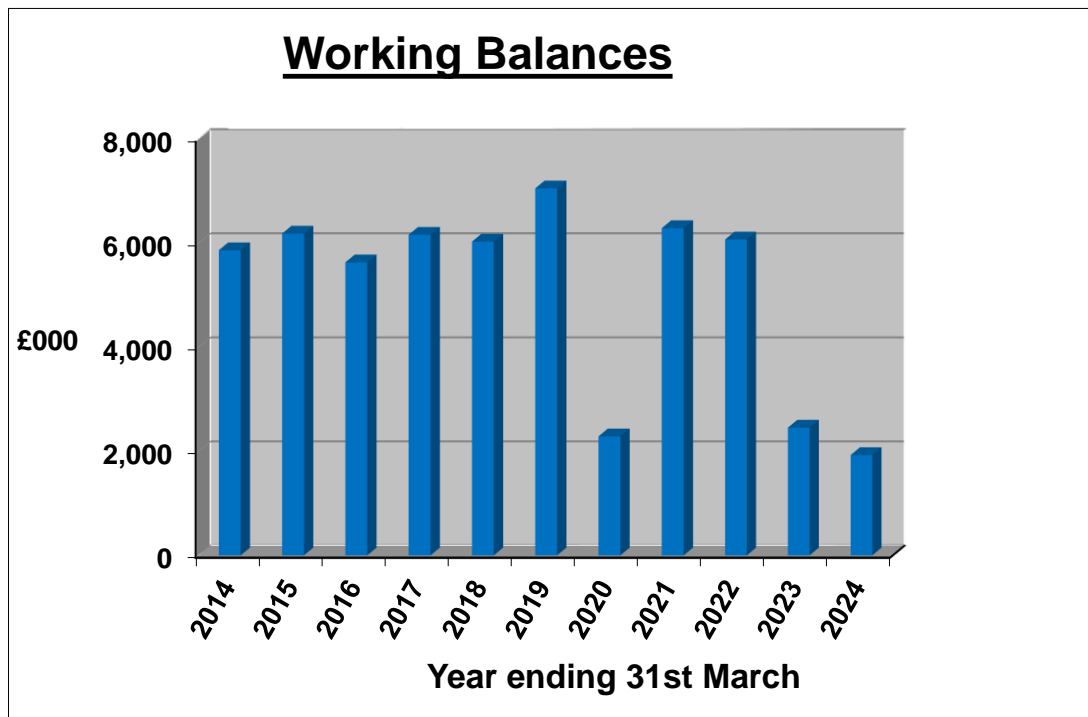
	<p>contributions. There is a £286k pressure on Homecare whereby the current commissioned hours exceeds budget. Direct payment pressures of £417k are resulting from a forecasted reduction in claw-backs based on year-to-date actuals and a number of ad-hoc payments being made outside of the Mosaic Interface. There is £602k in the forecast relating to the recently announced Market Sustainability and Improvement Fund which is being used to offset the residential/nursing top-ups and Out of Area fee rates. Adult Social Care and Care and Support are forecasting an underspend of £84k due to a high volume of vacant positions.</p>	
Community and Environmental Services	<p>An overspend of £500k is forecast. Children’s Transport Services is reporting an overspend of £500k due to a combination of increased demand pressures and historic savings targets which have not been able to be achieved. Waste Services are reporting a break-even position. There are forecast pressures within Street Cleansing and within Public Conveniences, where an inflationary uplift has been applied to the contract. Trade Waste income, however, is forecasting an increase against budget to offset these pressures. There are pressures in other services of the Directorate but these are expected to be covered by other savings and income generation.</p>	500
Communications and Regeneration	<p>An overspend of £10k is forecast. Tourism and Communications is forecasting a pressure of £50k due to increased costs in Visit Blackpool. There are also risks around income generation as a result of the cost of living crisis and increased costs in relation to the Illuminations extension that will be quantified later in the year. Economic Development and Cultural Services is currently forecasting an underspend of £40k due to vacant posts.</p>	10
Strategic Leisure Assets	<p>Strategic Leisure Assets is forecasting an underspend of £854k due to a reduction in the forecast repair spend and a release from reserves no longer expected to be required. In accordance with the original decision for this programme by the Executive on 7 February 2011 any under or overspend on Strategic Leisure Assets will be transferred to an Earmarked Reserve. The cumulative deficit as at March 2022/23 was £10,690k. In 2023/24 a transfer of £1,420k has been made to Contributions to</p>	Nil

	Reserves reducing this deficit balance to £9,270k. This transfer is in line with the budget. The above underspend will further reduce this deficit to £8,416k. The latest Leisure Assets medium-term financial plan currently expects the service to break-even, in-year, from 2023/24 and cumulatively by 2034/35.	
Growth and Prosperity	An underspend of £3,600k is forecast. This is due to the expectation of proceeds raised from the current work programme exceeding costs including prudential borrowing. The Executive at its meeting on 8 November 2021 agreed to the approach to transition out the Growth and Prosperity net revenue budget target over a 2-year period, 2022/23-23/24, with any proceeds subsequently realised from the existing work programme being directed to bolstering reserves and any new proceeds being retained by Growth and Prosperity for re-investment. This surplus will be transferred to Earmarked Reserves to go against the current balance. The cumulative deficit as at March 2022/23 was £10,125k and it is therefore expected that the balance at the end of 2023/24 will be £6,525k.	Nil
Public Health	A break-even position is forecast. The Public Health Directorate is forecasting spending the full grant of £19,858,394 in the financial year to March 2024.	Nil
Governance and Partnership Services	An underspend of £12k is forecast. Corporate Legal Services is forecasting a £50k overspend due to additional staffing costs. Information Governance is forecasting an underspend of £37k due to increased income and a release of reserves that is now deemed as no longer required and Life Events is forecasting an underspend of £25k due to staff turnover.	(12)
Resources	An underspend of £180k is forecast. Savings across the Directorate relate to staff vacancies, dis-establishment of posts, additional income from HMRC, other income generation opportunities and the receipt of New Burdens funding for the Covid-19 business support grant post-assurance work.	(180)

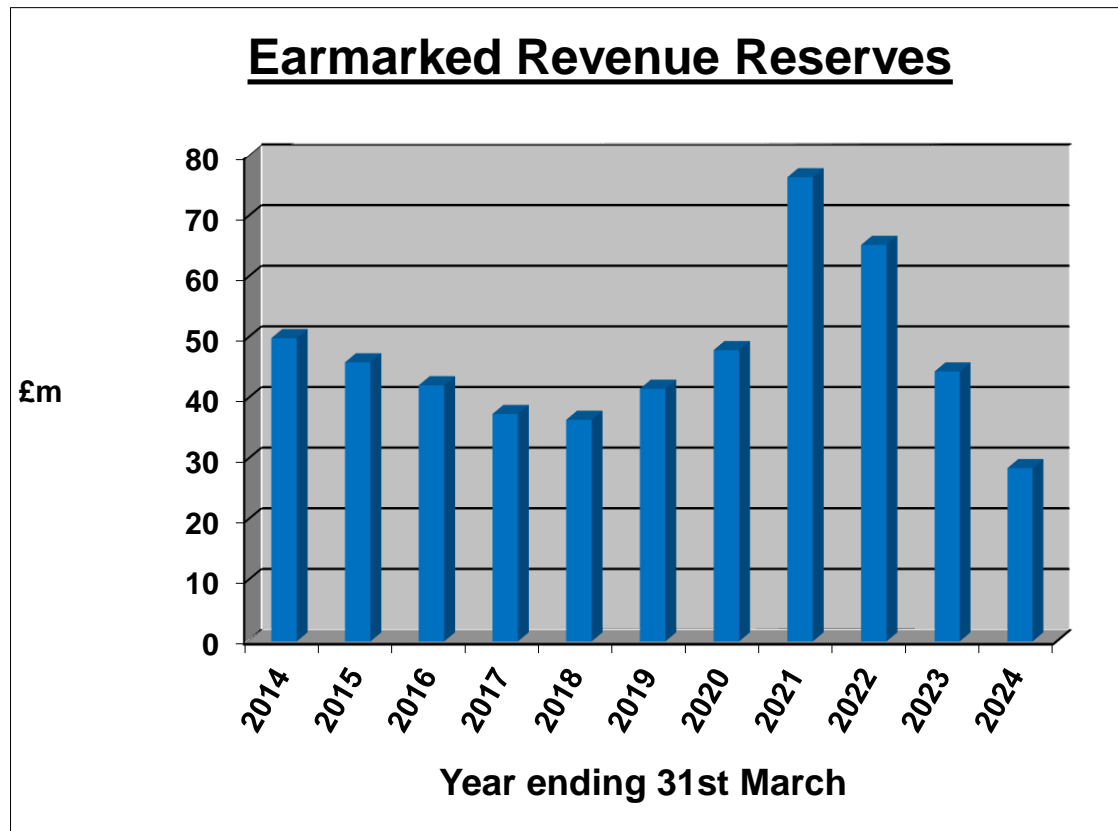
Chief Executive	An underspend of £200k is forecast due to a release of a reserve now deemed as no longer required.	(200)
Budgets Outside the Cash Limit	An underspend of £1,520k is forecast. Parking Services is currently forecasting a £100k overspend due to lower than budgeted income. The ability to maintain this position depends on the impact of the cost of living crisis, the quality of the October holiday season and the availability of parking due to regeneration projects within the town. Treasury Management is forecasting an underspend of £1,466k, which includes £2,184k of prudential recharges to services and means that the £150k savings target will be met in 2023/24 and an increase in interest received from investments providing additional income of £191k. Offset against this is £844k pressure relating to higher interest rates on temporary borrowing and a reduction in the interest charge to the Housing Revenue Account as less borrowing is required in 2023/24 than originally budgeted. However, interest rates are predicated to increase further over the duration of the financial year and these increases are likely to have a negative impact on the current position of the service. The Council is currently using 50:50 temporary and long-term borrowing to finance prudentially-funded capital expenditure and this gearing is under continual review by the Treasury Management Panel. The Business Loans Fund has a savings target of £154k and is forecasting a surplus of £119k as new business loans have been awarded at higher repayment rates than originally forecast for 2023/24. This underspend has reduced from M4 as interest rates have been increased from 4.5% to 5% in the forecast. Following a review of the Minimum Revenue Provision (MRP), which was approved by the Executive on 8 February 2021, a saving of £5,158k is forecast to be achieved in 2023/24. Subsidiary Companies is forecasting a £35k saving due to reduction in charges, mainly relating to debt management. All other services within the Budgets Outside the Cash Limit are forecasting no in-year pressures in 2023/24.	(1,520)
Contingencies and Reserves	The original Contingencies Cash Limited Budget was £7,722k. Movements out of Contingencies since the beginning of the financial year have been reflected in services' Cash Limited Budgets. Services will be	(3,227)

	<p>experiencing both pay and non-pay pressures during the year. The cost of the pending pay award (based on the initial pay offer which has been rejected) is estimated at £4,829k compared to the provision in Contingencies for a 2% pay award of £1,686k resulting in an initial pressure of £3,143k. However, energy is currently forecast to cost £5,110k compared to the provision in Contingences of £8,699k resulting in a saving of £3,589k. Adult Services have updated the Adults Reserve forecast and this is reflected in the Reserve tables below. This has also improved the Contingencies position by £1,000k. There is an additional Public Health saving of £200k and a Business Rate refund relating to Central Car Park of £505k. A further improvement of £1,076k is due to budgeted Transfers to Reserves that are no longer required. The overall net impact is therefore an underspend of £3,227k.</p>	
<b>Total</b>		<b>4,863</b>

The graph below shows the stark impact on the level of Council working balances in year together with the last 10 years' year-end balances for comparison:



Whilst the Council maintains working balances to address any in-year volatilities, it also maintains a number of Earmarked Revenue Reserves (ERR) for such longer-term commitments as future Private Finance Initiative payments, uncertainties within the Localised Business Rate system and self-insured risks and insurance excesses. In order to present a complete picture of the Council's financial standing an equivalent graph to that of working balances, including a projection to 31 March 2024, is shown below:



Provisional Available Earmarked Reserves	£m
Provisional Balance at 1 April 2023	44.511
Less: Savings target	(9.946)
Add: Growth and Prosperity Reserve	3.600
Add: Strategic Leisure Assets Underspend	0.854
Less: Savings targets in services to be transferred from reserves	(0.440)
Less: Estimated other movements in 2023/24	<u>(10.004)</u>
Forecast Available Earmarked Revenue Reserves as at 31 March 2024	<u>28.575</u>

## 6.4 Budget Savings

Appendix 2p comprises a summary schedule showing the progress made by directorates in achieving their revenue budget savings targets for 2023/24 which total £23,395k. As at 31 August 2023 61% of the 2023/24 recurrent savings target has been delivered. The full-year forecast predicts that 90% will be achieved by the year-end. Currently 45% of the saving has been found recurrently.

## 6.5 Collection Rates

### Council Tax

Being the most deprived local authority in England per the Office for National Statistics, collection of Council Tax is a challenge but 2022/23 saw an improvement in collection rate to 5<sup>th</sup> lowest and this progress has continued with the amount collected for Council Tax (excluding Police and Fire precepts) being £29.2m and the collection rate **42.0%** at the end of month 5. This compares to £27.4m and 42.2% at the same point in 2022/23. The amount collected has risen by £1.8m, which is mainly due to increases in both the Council Tax rate and base.

In the light of the reductions in discount and the introduction of the Local Council Tax Reduction Scheme the target collection rate is still 97.5% over a 4-year collection period as approved on 31 January 2023 as part of the setting of the Council Tax Base for 2023/24.

### Council Tax Reduction Scheme (CTRS)

The Council Tax Reduction Scheme was introduced on 1 April 2013. It is approved annually to ensure that a local Council Tax Reduction Scheme is in place by the start of the following financial year thereby avoiding the financial risks associated with the Government imposing a default scheme. The current 2023/24 Scheme was approved by the Executive on 23 January 2023 to ensure that Council Tax support is available to pensioners and the working aged based upon a means test.

At the end of month 5 the amount collected (excluding Police and Fire precepts) in respect of the Council Tax Reduction Scheme and Council Tax for those who have to pay CTRS either for the first time or in addition to a proportion of their Council Tax was £1.08m and the collection rate was **31.4%**. This compares to £1.3m and 31.5% at the same point in 2022/23.

The likely impact for 2023/24 is that the underlying rate of collection of Council Tax Reduction Scheme will be under similar pressure to 2022/23 due to accumulated arrears, limits on the amount that can be recovered from Attachment of Benefits and the impact of the cost of living crisis on disposable household income.

## Business Rates

Prior to 1 April 2013 Business Rate income was collected by billing authorities on behalf of central government and then redistributed among all local authorities and police authorities as part of Formula Grant. Since then the income relating to Blackpool is shared between central government (50%), the Council (49%) and the Fire Authority (1%) other than for an intermittent period when Blackpool Council participated in a Lancashire-wide pooling arrangement.

During 2022/23 Blackpool's collection rate rose significantly from 21<sup>st</sup> lowest in England to 32<sup>nd</sup> lowest and this progress has continued with the amount collected for Business Rates being £16.8m and the collection rate **44.4%** at the end of month 5. This compares to £18.8m and 43.7% at the same point in 2022/23. 2022/23 excludes the s31 Extended Retail/Nurseries, etc. relief provided by central government which reduced to 50% in 2022/23. This will have a slight impact on future collection rates.

From April 2014 Business Ratepayers have been entitled to elect to pay by 12 monthly instalments instead of over 10 months which has allowed businesses more time to pay.

In the 5 months to the end of August 2023 - 391 business rate summonses were issued.

## 6.6 Capital Monitoring Performance

All active capital schemes have been included within Appendix 2q. The purpose is to present the overall position of capital spend. The schemes are shown individually where total scheme budget is greater than £500k and grouped as "other schemes" otherwise. As in previous financial years, the emphasis regarding capital monitoring will be on scheme variance rather than in-year progress since many schemes cross financial years such as the major housing developments. Therefore, some degree of flexibility for the management of slippage is necessary in order to balance the overall capital programme each year to the funding allocations available.

The report includes the capital programme as approved by the Executive on 6 February 2023. The month 5 report includes this data for comparative purposes. Future reports may show further changes in the Capital Programme, representing schemes that were approved after submission of the 2023/24 capital programme.

The economic climate remains challenging. High inflation, rising interest rates, supply chain issues (particularly in relation to steel) and a lack of labour are leading to increased costs, primarily on capital schemes that are likely to span a number of years. An ongoing review of capital schemes is therefore being undertaken to establish any schemes where approved budgets may become insufficient and

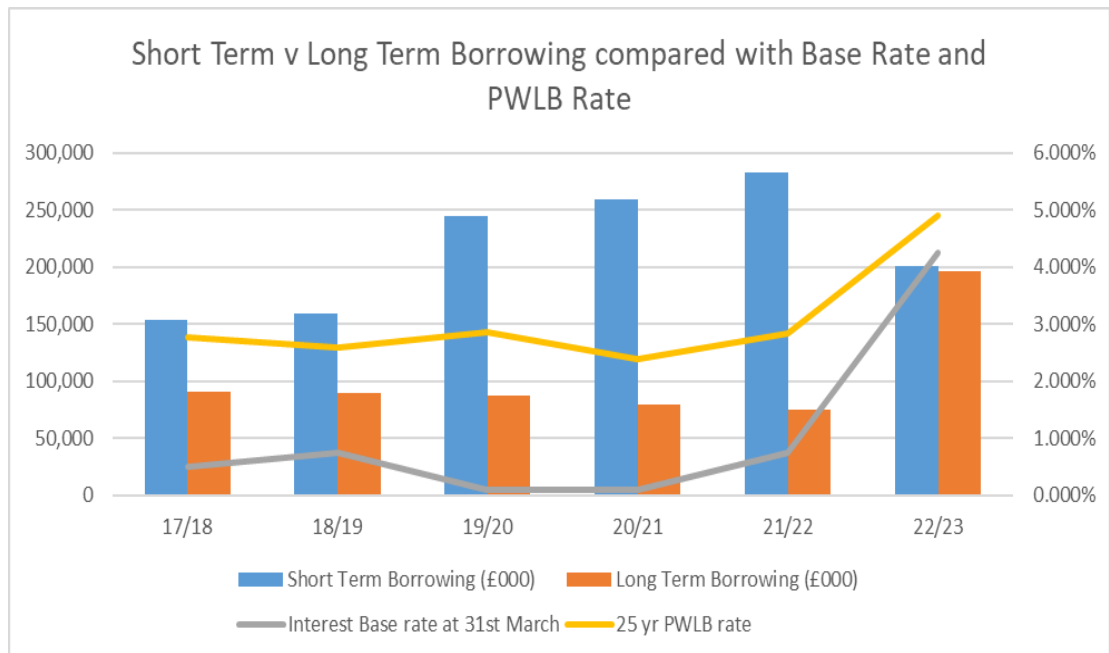
potential overspendings identified. Therefore, in tandem an asset disposal plan is being developed to generate capital receipts that may be applied to offset any such pressures. In some cases where appropriate, legal challenge/adjudication will be considered to redress the position. Where uncertainties of outcomes (adverse or favourable) still exist, scheme forecast variances are shown as break-even but highlighted as amber.

## 6.7 Summary Cash Flow Statement

As part of the reporting format for this financial year a summary cash flow statement is included at Appendix 2r. This provides a comparison of the actual cash receipts and payments compared to forecast for 2023/24.

During the first 5 months of the year the Council’s net cashflow has resulted in fluctuations in short-term net investment/borrowing balances due to the receipt of up-front grant income in this financial year. The Council fixed £125m of temporary loans in August 2022 at around 3.0%, which resulted in an increase in investment balances and over the next few months short-term borrowing will be repaid using the fixed-term borrowing taken.

The graph below demonstrates the changes in the profile of the Council’s borrowings over the last 6 years. It shows that Council borrowing has increased from less than £250m at the end of 2017/18 to nearly £400m at the end of 2022/23. The profile of this borrowing has also changed as we now have a 50:50 split between long-term and short-term borrowing as interest rates have rapidly risen with uncertainties on where they will land and with consequences of increased borrowing costs.





## 6.8 **Summary Balance Sheet**

In order to provide a complete picture of the Council's financial performance Appendix 2s provides a snapshot of the General Fund balance sheet as at the end of month 5. The key areas of focus are any significant movements in debtors, cash and cash equivalents, bank overdraft and creditors as these impact upon the Council's performance in the critical areas of debt recovery, treasury management and Public Sector Payment Policy.

The balance sheet has been prepared under International Financial Reporting Standards (IFRS/IASs). Each year an accounting adjustment under IAS 19 is made for the value of the pension fund at year-end. In 2022/23, for the first time, this produced a pension asset rather than a pension liability. Based on the latest advice from the Pension Fund the Council has not recognised the pension asset. However this is currently under review and therefore the figure is subject to change. Any change will also affect the unusable reserves. Usable reserves include unallocated General Fund reserves and revenue reserves. Unusable reserves are those that the Council is not able to use to provide services. This category includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets were sold.

Due to statutory changes regarding the accounting treatment of infrastructure assets which were approved in Parliament in late November 2022, the 2020/21 and 2021/22 accounts have not yet been signed off by the Council's external auditor. The audits are still ongoing and as soon as they are completed the 2022/23 balance sheet may require amendment, therefore the figures should be treated as draft.

Over the 5-month period there has been an increase in Property, Plant and Equipment of £33.4m due to capital expenditure which is in line with the Council's approved capital programme for 2023/24. Short-term borrowing has reduced by £9.1m due to the timing of capital and revenue grants.

## 6.9 **Medium-Term Financial Plan Update and Earmarked Reserves Forecast**

The 6-year Medium-Term Financial Sustainability Strategy (MTFSS) covering 2021/22 – 2026/27 was approved by the Executive on 8 November 2021 and whilst the principles still stand the current economic climate has had a significant impact on the supporting Medium Term Financial Plan (MTFP).

Officers are meeting regularly to review and continuously update the Medium Term Financial Plan and the Corporate Leadership Team were meeting on 26 September 2023 and fortnightly thereafter as part of the budget planning process for 2024/25.

An updated position will be reported to a future Executive as part of the financial monitoring, but a latest indication of future Budget gaps based on current information is given below:

Medium Term Financial Plan v1.4		
2024/25	Budget Gap 2025/26	2026/27
£m	£m	£m
<b>22.8</b>	<b>7.3</b>	<b>7.9</b>

As part of this budget planning process which consolidates the individual MTFPs of the Children’s, Adult and Growth and Prosperity services, a detailed exercise has also been undertaken on their consequences upon Earmarked Revenue Reserves to check the validity of amounts held and a forecast of when funds will be drawn down over the same period as the latest MTFSS. A summary table is shown below:

Reserves Summary						
Directorate	Draft 31/03/22	Est Balance 31/03/23	Est Balance 31/03/24	Est Balance 31/03/25	Est Balance 31/03/26	Est Balance 31/03/27
	£m	£m	£m	£m	£m	£m
<b>Total</b>	<b>(65.4)</b>	<b>(44.5)</b>	<b>(28.6)</b>	<b>(24.9)</b>	<b>(26.2)</b>	<b>(28.6)</b>

In addition to General Fund Earmarked Revenue Reserves the Council holds a Dedicated Schools Grant (DSG) Reserve to manage the Schools, High Needs and Early Years Blocks of grant. Under a Statutory Override to 2025/26 this reserve is maintained separately from the Council’s portfolio of revenue reserves as many local authorities are in significant deficit and their consolidation could tip their overall financial standing into deficit. In Blackpool’s case the DSG Reserve stood at a deficit of £2,784k as at 31 March 2023 but with the support of the Department for Education’s Safety Valve Programme this reserve is planned to return to surplus in 2024/25.

A further reserve to note is the Council’s Housing Revenue Account (Appendix 2n), a ringfenced account for the management and maintenance of the Council’s housing stock. As at 31 March 2023 this reserve was at a level of £1,721k and is forecast to be £1,311k at the end of the financial year; still ahead of its minimum agreed level of £1m.

#### 6.10 Central Government Monitoring and Oversight

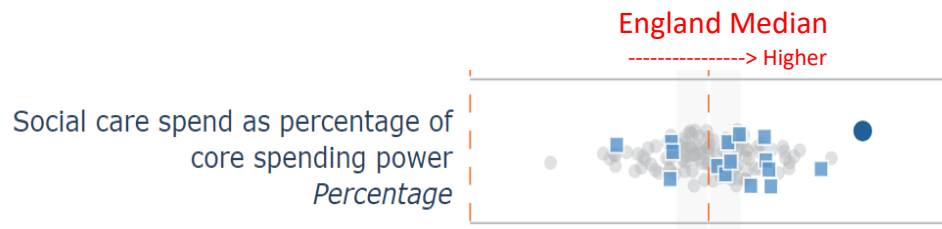
Local government finance is clearly in a fragile and precarious position. There are at least 25 local authorities who have been outed in the media recently for challenges with their financial standing and there are many others who are known to be struggling. In addition, 8 have already filed Section 114 (s114) Notices. Councils are

required by law to have balanced budgets. The issuing of a s114 notice stops all but essential spending, making sure that vital services can continue to be provided to the most vulnerable residents. External oversight exists via periodic Local Government Association peer reviews and CIPFA financial healthchecks but local public audit has been unable to keep up the pace with 504 external audits outstanding in England between 2015/16-2021/22 at the last count. On top of this central government does require 29 financial monitoring returns from local authorities each year.

As a result of this perilous climate the Department for Levelling Up, Housing and Communities launched the Office for Local Government (Oflog) in July this year, whose purpose is to increase transparency, foster accountability and use data to further improve performance and help identify problems at an earlier stage. Using most recent financial data from the 2021/22 Revenue Outturn (RO) returns, Oflog has published benchmarking data for local authorities against others and particularly nearest neighbours. These can be found within the following link:

[Local Authority Data Explorer - DLUHC Data Dashboards](#)

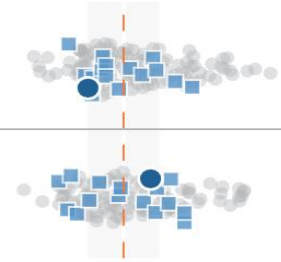
As an example of what is available and relevant, the following dashboard shows Blackpool's social care spend as a percentage of its core spending power which unsurprisingly is in the highest quartile as would be expected for a local authority with such deprivation and demand. The blue circle is Blackpool, blue squares are Blackpool's statistical neighbours and the grey circles are all other local authorities:



Again, unsurprisingly the level of debt reflecting the magnitude of the generational programme of capital investment is above the median though not significantly, whilst the debt financing is below the median illustrating effective treasury management:

Debt servicing as percentage of  
core spending power  
*Percentage*

Total debt as percentage of core  
spending power  
*Percentage*



Officers will endeavour to employ this tool in future monthly financial monitoring reports.

### 6.11 Conclusions and Recommendations

The Council's Revenue Budget for 2023/24 set a target level of General Fund working balances of around £6m. However, given the current economic climate it is recommended that work continues towards target working balances of £6m by 31 March 2024 rising to £8m by 31 March 2025. Earmarked revenue reserves at the start of the financial year stood at £44.5m, though with known in-year commitments against this the balance will fall to an estimated £28.6m by the end of the year. This should still be sufficient to underwrite the current year's financial risks with a financial plan in place for the Council's wholly-owned companies (ref. Appendix 2o).

If the 2023/24 forecast position became the actual outturn, then in accordance with the Council's Financial Procedure Rules within its Constitution the forecast revenue outturn 2023/24 within this report contravenes one of the two specific conditions that excess spending does not:

1. exceed 1% (= £5m) of the authority's total gross revenue expenditure; or
2. have the effect of reducing the authority's Working Balances below 50% of their normal target level (= £3m).

However, these are still unprecedented times for the whole of the local government sector and in the context of relatively healthy levels of Earmarked Revenue Reserves and with 7 months of the financial year still remaining officers are working continuously to improve the position - revised service and financial plans are being developed including the review of technical accounting treatments, a continuing policy of freezing non-essential spend, a robust approach at weekly Resourcing Panel meetings to only allow the filling of critical vacant posts and the prospective redesignation of earmarked reserves should they need to be used.

6.12 Does the information submitted include any exempt information?

**7.0 List of Appendices:**

No

Appendix 2a - Revenue Summary  
Appendix 2b - Chief Executive  
Appendix 2c - Governance and Partnership Services  
Appendices 2c/d - Ward Budgets  
Appendix 2e - Resources  
Appendix 2f - Communications and Regeneration  
Appendix 2g - Strategic Leisure Assets  
Appendix 2h - Growth and Prosperity  
Appendix 2i - Community and Environmental Services  
Appendix 2j - Adult Services  
Appendix 2k - Children's Services  
Appendix 2l - Public Health  
Appendix 2m - Budgets Outside the Cash Limit  
Appendix 2n - Housing Revenue Account  
Appendix 2o - Wholly-owned companies  
Appendix 2p - Budget Savings performance  
Appendix 2q - Capital Monitoring  
Appendix 2r - Cash Flow Summary  
Appendix 2s - General Fund Balance Sheet Summary

**8.0 Financial considerations:**

8.1 As outlined in this report and appendices.

**9.0 Legal considerations:**

9.1 None.

**10.0 Risk management considerations:**

10.1 Impact of financial performance against approved Revenue budgets and upon Council reserves and balances.

**11.0 Equalities considerations and the impact of this decision for our children and young people:**

11.1 An Equalities Impact Assessment was produced as a part of the budget-setting process and remains relevant.

**12.0 Sustainability, climate change and environmental considerations:**

12.1 None directly from this report.

**13.0 Internal/ External Consultation undertaken:**

13.1 None.

**14.0 Background papers:**

14.1 None.

**15.0 Key decision information:**

15.1 Is this a key decision? No

15.2 If so, Forward Plan reference number:

15.3 If a key decision, is the decision required in less than five days? N/A

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

**16.0 Call-in information:**

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

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

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**17.0 Scrutiny Committee Chairman (where appropriate):**

Date informed:

Date approved:

**18.0 Declarations of interest (if applicable):**

18.1

**19.0 Summary of Discussion:**

19.1

**20.0 Executive decision:**

20.1

**21.0 Date of Decision:**

21.1

**22.0 Reason(s) for decision:**

22.1

**23.0 Date Decision published:**

23.1

**24.0 Alternative Options Considered and Rejected:**

24.1

**25.0 Executive Members present:**

25.1

**26.0 Call-in:**

26.1

**27.0 Notes:**

27.1

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## Blackpool Council

Revenue summary - budget, actual and forecast:

BLACKPOOL COUNCIL							
FORECAST GENERAL FUND POSITION AS AT 31 MARCH 2024							
SUMMARY							
APP.	GENERAL FUND NET REQUIREMENTS	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
		ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24 PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
2(b)	CHIEF EXECUTIVE	1,537	(1,217)	2,554	1,337	(200)	-
2(c)	GOVERNANCE & PARTNERSHIP SERVICES	1,985	349	1,624	1,973	(12)	-
2(c/d)	WARD BUDGETS	269	(61)	330	269	-	-
2(e)	RESOURCES	2,419	(4,212)	6,451	2,239	(180)	-
2(f)	COMMUNICATIONS AND REGENERATION	4,085	2,873	1,222	4,095	10	-
2(g)	STRATEGIC LEISURE ASSETS	2,625	571	1,200	1,771	(854)	-
	STRATEGIC LEISURE ASSETS - TRANSFER TO/(FROM) RESERVES	-	-	854	854	854	-
2(h)	GROWTH & PROSPERITY	(5,879)	957	(10,436)	(9,479)	(3,600)	-
	GROWTH & PROSPERITY - TRANSFER TO/(FROM) RESERVES	-	-	3,600	3,600	3,600	-
2(i)	COMMUNITY & ENVIRONMENTAL SERVICES	53,274	9,936	43,838	53,774	500	-
2(j)	ADULT SERVICES	63,968	25,167	42,291	67,458	3,490	-
2(k)	CHILDREN'S SERVICES	68,316	22,562	51,756	74,318	6,002	-
2(l)	PUBLIC HEALTH	3	(16,822)	16,825	3	-	-
2(m)	BUDGETS OUTSIDE THE CASH LIMIT	13,735	(2,521)	14,736	12,215	(1,520)	-
	CAPITAL CHARGES	(30,008)	(12,503)	(17,505)	(30,008)	-	-
	<b>NET COST OF SERVICES:</b>	<b>176,329</b>	<b>25,079</b>	<b>159,340</b>	<b>184,419</b>	<b>8,090</b>	-
	CONTRIBUTIONS:						
	- TO / (FROM) RESERVES	(13,102)	(8,526)	(4,576)	(13,102)	-	-
	- 2022/23 SERVICE OVER/(UNDERSPENDS)	-	-	-	-	-	-
	- REVENUE CONSEQUENCES OF CAPITAL OUTLAY	500	-	500	500	-	-
	CONTINGENCIES	7,699	(438)	4,910	4,472	(3,227)	-
	LEVIES	457	74	383	457	-	-
	<b>CONTRIBUTIONS, etc.</b>	<b>(4,446)</b>	<b>(8,890)</b>	<b>1,217</b>	<b>(7,673)</b>	<b>(3,227)</b>	-
	<b>TOTAL NET EXPENDITURE TO BE MET FROM PUBLIC FUNDS</b>	<b>171,883</b>	<b>16,189</b>	<b>160,557</b>	<b>176,746</b>	<b>4,863</b>	-
	ADDED TO/(TAKEN FROM) BALANCES	4,335	-	(528)	(528)	(4,863)	-
	<b>NET REQUIREMENT AFTER WORKING BALANCES</b>	<b>176,218</b>	<b>16,189</b>	<b>160,029</b>	<b>176,218</b>	<b>-</b>	-
<b>GENERAL BALANCES AS AT 1st APRIL 2023 PER UNAUDITED STATEMENT OF ACCOUNTS 2022/23</b>							<b>2,459</b>
Budgeted In-year (reduction in) / addition to General Fund Working Balances							4,335
							<b>6,794</b>
Forecast In-year (reduction in) / addition to General Fund Working Balances							(4,863)
<b>ESTIMATED UNEARMARKED WORKING BALANCES AS AT 31st MARCH 2024</b>							<b>1,931</b>

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## Blackpool Council - Chief Executive

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
<b>CHIEF EXECUTIVE</b>						
<b>NET EXPENDITURE</b>						
CHIEF EXECUTIVE	620	325	295	620	-	-
HUMAN RESOURCES, ORGANISATION AND WORKFORCE DEVELOPMENT	(7)	(982)	975	(7)	-	-
<b>CHIEF EXECUTIVE TOTAL</b>	<b>613</b>	<b>(657)</b>	<b>1,270</b>	<b>613</b>	<b>-</b>	<b>-</b>
CORPORATE DELIVERY UNIT	(9)	(1,557)	1,348	(209)	(200)	-
HOUSING	933	997	(64)	933	-	-
<b>ASSISTANT CHIEF EXECUTIVE</b>	<b>924</b>	<b>(560)</b>	<b>1,284</b>	<b>724</b>	<b>(200)</b>	<b>-</b>
<b>TOTALS</b>	<b>1,537</b>	<b>(1,217)</b>	<b>2,554</b>	<b>1,337</b>	<b>(200)</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for each individual service within the Chief Executive's Directorate against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year.

#### Chief Executive

This service is currently forecasting a break-even position.

#### Human Resources, Organisation and Workforce Development

This service is currently forecasting a break-even position.

#### Corporate Delivery Unit

This service is currently forecasting a £200k underspend due to the release of a reserve now deemed as no longer required.

#### Housing

This service is currently forecasting a break-even position.

**Budget Holder – Mr N Jack, Chief Executive**

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## Blackpool Council – Governance and Partnership Services

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	2023/24					
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
<b>GOVERNANCE &amp; PARTNERSHIP SERVICES</b>						
<b>NET EXPENDITURE</b>						
DEMOCRATIC GOVERNANCE	2,358	1,510	848	2,358	-	-
CORPORATE LEGAL SERVICES	(59)	(1,161)	1,152	(9)	50	-
INFORMATION GOVERNANCE	78	(178)	219	41	(37)	-
LIFE EVENTS	(392)	178	(595)	(417)	(25)	-
<b>GOVERNANCE &amp; PARTNERSHIP SERVICES</b>	<b>1,985</b>	<b>349</b>	<b>1,624</b>	<b>1,973</b>	<b>(12)</b>	<b>-</b>
WARDS	269	(61)	330	269	-	-
<b>TOTALS</b>	<b>2,254</b>	<b>288</b>	<b>1,954</b>	<b>2,242</b>	<b>(12)</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for each individual service within Governance and Partnership Services against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with the head of service.

#### Democratic Governance Service

The Democratic Governance Service is currently forecasting a break-even position.

#### Corporate Legal Services

This service is forecasting a £50k overspend due to increasing additional staffing costs.

#### Information Governance

This service is forecasting an underspend of £37k due to increased income and a release of reserves that is now deemed as no longer required.

#### Life Events

This service is forecasting an underspend of £25k due to staff turnover.

#### Ward Budgets

Ward budgets are expected to break-even in 2023/24.

Budget Holder - Mr M Towers, Director of Governance and Partnership Services.

**Blackpool Council**  
**Ward Budgets**  
**2023/24**  
**Month 5**

## Wards

Ward	Councillors	Total No. of Requisitions Submitted	No. of Requisitions Approved	No. Awaiting Approval	Total No. of Requisitions Completed	Total 2023-24 Budget	2023-24 Budget Committed to Approved Schemes	Remaining 2023-24 Budget
Anchorsholme Ward 61008/61030	Cllr. Galley Cllr. Cooper	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Bispham Ward 61009/61031	Cllr. Warne Cllr. Wilshaw	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Bloomfield Ward 61010/61032	Cllr. Fenlon Cllr. Hobson	0 3	0 3	0 0	0 3	£7,000.00 £7,000.00	£0.00 £1,031.00	£7,000.00 £5,969.00
Brunswick Ward 61011/61033	Cllr. Marshall Cllr. Thomas	1 1	1 1	0 0	0 0	£7,000.00 £7,000.00	£315.42 £382.35	£6,684.58 £6,617.65
Claremont Ward 61012/61034	Cllr. Taylor Cllr. L Williams	3 3	3 3	0 0	2 2	£7,000.00 £7,000.00	£2,879.43 £2,879.43	£4,120.57 £4,120.57
Clifton Ward 61013/61035	Cllr. Burdess Cllr. Humphries	4 4	4 4	0 0	2 2	£7,000.00 £7,000.00	£2,288.17 £2,308.16	£4,711.83 £4,691.84
Greenlands Ward 61014/61036	Cllr. Flanagan Cllr. Jones	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Hawes Side Ward 61015/61037	Cllr. N Brookes Cllr. Critchley	1 1	1 1	0 0	0 0	£7,000.00 £7,000.00	£100.00 £99.00	£6,900.00 £6,901.00
Highfield Ward 61016/61038	Cllr. Hunter Cllr. B Mitchell	1 0	1 0	0 0	0 0	£7,000.00 £7,000.00	£144.00 £0.00	£6,856.00 £7,000.00
Ingthorpe Ward 61017/61039	Cllr. Bamborough MBE Cllr. Farrell	0 1	0 1	0 0	0 1	£7,000.00 £7,000.00	£0.00 £100.00	£7,000.00 £6,900.00
Layton Ward 61018/61040	Cllr. Benson Cllr. Boughton	4 4	4 4	0 0	2 1	£7,000.00 £7,000.00	£917.56 £917.55	£6,082.44 £6,082.45
Marton Ward 61019/61041	Cllr. S Brookes Cllr. S Smith	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Norbreck Ward 61020/61043	Cllr. Ellison Cllr. Sloman	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Park Ward 61021/61044	Cllr. Campbell Cllr. Hoyle	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Squires Gate Ward 61022/61045	Cllr. C Mitchell MBE Cllr. Walsh	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Stanley Ward 61023/61046	Cllr. Baker Cllr. Roberts	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Talbot Ward 61024/61046	Cllr. Hugo Cllr. M Smith	3 3	3 3	0 0	2 2	£7,000.00 £7,000.00	£620.38 £620.37	£6,379.62 £6,379.63
Tyldesley Ward 61025/61047	Cllr. Roe Cllr. Webb	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Victoria Ward 61026/61048	Cllr. Jackson Cllr. P Brookes	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00
Warbreck Ward 61027/61049	Cllr. D Scott Cllr. Mrs M Scott	3 3	3 3	0 0	3 3	£7,000.00 £7,000.00	£1,272.50 £1,272.50	£5,727.50 £5,727.50
Waterloo Ward 61028/61050	Cllr. Cartmell Cllr. D Mitchell MBE	0 0	0 0	0 0	0 0	£7,000.00 £7,000.00	£0.00 £0.00	£7,000.00 £7,000.00

<b>Ward Totals</b>	<b>43</b>	<b>43</b>	<b>0</b>	<b>25</b>	<b>£294,000.00</b>	<b>£18,147.82</b>	<b>£275,852.18</b>
<b>Unallocated Budget</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(£25,000.00)</b>	<b>£0.00</b>	<b>(£25,000.00)</b>
<b>Income Budget</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>£0.00</b>	<b>£0.00</b>	<b>£0.00</b>
<b>Area Ward Totals</b>	<b>43</b>	<b>43</b>	<b>0</b>	<b>25</b>	<b>£269,000.00</b>	<b>£18,147.82</b>	<b>£250,852.18</b>

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## Blackpool Council - Resources

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	2023/24					
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
<b>RESOURCES</b>						
<b>NET EXPENDITURE</b>						
PROCUREMENT & EXCHEQUER SERVICES	(8)	(184)	116	(68)	(60)	-
BENEFITS	(1,615)	1,090	(2,705)	(1,615)	-	-
REVENUES SERVICES	1,765	1,642	123	1,765	-	-
CUSTOMER FIRST	18	(339)	368	29	11	-
ICT SERVICES	(9)	(1,978)	1,969	(9)	-	-
ACCOUNTANCY	23	(667)	595	(72)	(95)	-
RISK SERVICES	(4)	(451)	428	(23)	(19)	-
PROPERTY SERVICES (Incl. INVESTMENT PORTFOLIO)	2,250	(3,237)	5,476	2,239	(11)	-
EQUALITY AND DIVERSITY	(1)	(88)	81	(7)	(6)	-
<b>TOTALS</b>	<b>2,419</b>	<b>(4,212)</b>	<b>6,451</b>	<b>2,239</b>	<b>(180)</b>	-

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for each individual service within Resources against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with each head of service.

#### Procurement and Exchequer Services

Procurement and Exchequer Services are forecasting an underspend of £60k. This position has been achieved as a result of measures to deliver savings through dis-establishment of posts and increased income opportunities. Additional one-off, ad-hoc income has been secured in year and there is currently a vacant post within the Procurement team.

#### Benefits

The Benefits Service is forecasting a break-even position. The cumulative Housing Benefit new claims processing outturn figure for August was 26 days. The cumulative processing time to-date for new claims for Housing Benefit, new claims for Council Tax Reduction and changes in circumstances notifications was 9 days.

#### Revenue Services

Revenue Services are forecasting a break-even position on a gross budget of £2.64m.

**Customer First**

Customer First is forecasting an overspend of £11k against a gross budget of £1.19m. This is due to an unachieved savings target but the position is expected to improve through the year.

**ICT Services**

ICT is forecasting a break-even position on a gross budget of £5.95m. The budget is currently under pressure from inflationary increases in software licences and the hardware supply chain. The budget is currently being balanced from additional income generation and staff turnover.

**Accountancy**

Accountancy is forecasting an underspend of £95k due to freezing of vacant posts and additional income from HMRC.

**Risk Services**

Risk Services are forecasting an underspend of £19k against a gross budget of £1.07m. This is due to a number of factors including staff vacancies, additional income opportunities and also through receipt of new burden funding for the Covid-19 business support grant post assurance work.

**Property Services (incl. Investment Portfolio)**

Property Services are forecasting an underspend of £11k against a gross budget of £14.28m, savings arising from staff vacancies across the service.

**Equality and Diversity**

Equality and Diversity are forecasting an underspend of £6k. This reflects the projected impact of a renegotiation with Unison of their Facilities Time Agreement.

**Summary of the revenue forecast**

After 5 months of the financial year Resources are forecasting a £180k underspend. The Directorate continues to operate on the basis of not filling staff vacancies other than in exceptional circumstances.

**Budget Holder - Mr S Thompson, Director of Resources**

## Blackpool Council – Communications & Regeneration

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND £000
	2023/24					
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
COMMUNICATIONS & REGENERATION						
NET EXPENDITURE						
ECONOMIC DEVELOPMENT & CULTURAL SERVICES	244	1,588	(1,384)	204	(40)	-
PLANNING	488	(328)	816	488	-	-
TOURISM AND COMMUNICATIONS	3,353	1,613	1,790	3,403	50	-
<b>TOTALS</b>	<b>4,085</b>	<b>2,873</b>	<b>1,222</b>	<b>4,095</b>	<b>10</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary – basis

The Revenue summary (above) lists the outturn projection for each individual service area within the Directorate against their respective, currently approved, revenue budget. The forecast outturn is based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with each head of service.

#### Economic Development and Cultural Services

This service is currently forecasting an underspend of £40k due to vacant posts.

#### Planning

This service is currently forecasting a break-even position.

#### Tourism & Communications

This service is forecasting a £50k pressure. This is due to some increased costs in Visit Blackpool. There are also risks around income generation in the Directorate as a result of the cost of living crisis and increased costs in relation to the Illuminations extension that will be quantified later in the year.

#### Budget Holder – Mr A Cavill, Director of Communications & Regeneration

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## Blackpool Council – Strategic Leisure Assets

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24		F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
			PROJECTED SPEND £000	FORECAST OUTTURN £000		
STRATEGIC LEISURE ASSETS						
NET EXPENDITURE						
STRATEGIC LEISURE ASSETS	2,625	571	1,200	1,771	(854)	-
<b>TOTALS</b>	<b>2,625</b>	<b>571</b>	<b>1,200</b>	<b>1,771</b>	<b>(854)</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for the Service against its respective, currently approved, revenue budget. The forecast outturn is based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with the head of service.

#### Key Issues

In month 5, Strategic Leisure Assets are reporting an underspend of £854k. This is due to a reduction in the forecast repair spend and a release from reserves no longer expected to be required.

In accordance with the original decision for this programme by the Executive on 7th February 2011, any under or overspend on Strategic Leisure Assets will be transferred to Earmarked Reserves to go against the current balance. The cumulative deficit as at March 2022/23 was £10,690k. In 2023/24, a transfer of £1,420k has been made to Contributions to Reserves reducing this deficit balance to £9,270k. This transfer is in line with the budget. The above underspend will further reduce this deficit to £8,416k.

The latest Leisure Assets medium-term financial plan currently expects the service to break-even, in-year, from 2023/24 and cumulatively by 2034/35.

**Budget Holder – Mr A Cavill, Director of Communications & Regeneration**

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## Blackpool Council – Growth & Prosperity

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24		F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
			PROJECTED SPEND £000	FORECAST OUTTURN £000		
GROWTH & PROSPERITY						
NET EXPENDITURE						
GROWTH & PROSPERITY	(5,879)	957	(10,436)	(9,479)	(3,600)	-
<b>TOTALS</b>	<b>(5,879)</b>	<b>957</b>	<b>(10,436)</b>	<b>(9,479)</b>	<b>(3,600)</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for the Service against its respective, currently approved, revenue budget. The forecast outturn is based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with the head of service.

#### Key Issues

As at month 5, the service is forecasting a surplus of £3,600k. This is due to the expectation of proceeds raised from the current work programme exceeding costs including prudential borrowing.

The Executive, at its meeting on 8<sup>th</sup> November 2021, agreed to the approach to transition out the Growth and Prosperity net revenue budget target over a 2-year period, 2022/23-2023/24, with any proceeds subsequently realised from the existing work programme being directed to bolstering reserves and any new proceeds being retained by Growth and Prosperity for their re-investment. It is therefore assumed that this surplus will be transferred to Earmarked Reserves to go against the current balance. The cumulative deficit as at March 2022/23 was £10,125k. It is therefore expected that the balance at the end of 2023/24 will be £6,525k.

**Budget Holder – Mr A Cavill, Director of Communications & Regeneration**

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## Blackpool Council – Community and Environmental Services

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24		F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
			PROJECTED SPEND £000	FORECAST OUTTURN £000		
<b>COMMUNITY &amp; ENVIRONMENTAL SERVICES</b>						
<b>NET EXPENDITURE</b>						
BUSINESS SERVICES	(915)	353	(1,268)	(915)	-	-
LEISURE AND CATERING	5,436	3,994	1,442	5,436	-	-
PUBLIC PROTECTION	1,457	993	464	1,457	-	-
HIGHWAYS AND TRAFFIC MANAGEMENT SERVICES	18,001	(985)	18,986	18,001	-	-
STREET CLEANSING AND WASTE	19,987	2,075	17,912	19,987	-	-
COASTAL AND ENVIRONMENTAL PARTNERSHIPS	6,501	1,817	4,684	6,501	-	-
INTEGRATED TRANSPORT	2,807	1,689	1,618	3,307	500	-
<b>TOTALS</b>	<b>53,274</b>	<b>9,936</b>	<b>43,838</b>	<b>53,774</b>	<b>500</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the outturn projection for each individual service area within the Directorate against their respective, currently approved, revenue budget. The forecast outturn overspend of £500k is based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with each head of service.

#### Business Services

This service is currently forecasting a break-even position.

#### Leisure and Catering

Leisure and Catering is currently forecasting a break-even position. Leisure income is in line with budget and there are savings within staffing, due to vacancies. Catering is facing a pressure due to the increased cost of provisions, but this is expected to be covered by other savings within the service.

#### Public Protection

The service is currently forecasting a break-even position. There are pressures within Licencing, where the income forecast is currently under budget. However, there have been savings identified within other areas of Public Protection to mitigate this.

#### Highways and Traffic Management Services

This service is currently forecasting a break-even position.

**Street Cleansing and Waste**

Waste Services are reporting a break-even position. There are forecast pressures within Street Cleansing and within Public Conveniences, where an inflationary uplift has been applied to the contract. Trade Waste income, however, is forecasting an increase against budget to off-set these pressures.

**Coastal and Environmental Partnerships**

This service is currently forecasting a break-even position.

**Integrated Transport**

This service is currently forecasting an overspend of £500k. Childrens Transport Services is reporting an overspend of £500k, due to a combination of increased demand pressures and historic savings targets which have not been able to be achieved.

**Conclusion – Community and Environmental Services financial position**

At the end of August 2023, the Community and Environmental Services Directorate is forecasting an overspend of £500k. The major pressure is within Integrated Transport where the Childrens Transport Service is forecasting a pressure of £500k. There are other pressures within the Directorate, but these are expected to be covered through other means.

**Budget Holder - Mr J Blackledge, Director of Community and Environmental Services**

## Blackpool Council - Adult Services

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24		F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
			PROJECTED SPEND £000	FORECAST OUTTURN £000		
ADULT SERVICES						
NET EXPENDITURE						
ADULT SOCIAL CARE	9,328	5,041	4,219	9,260	(68)	-
CARE & SUPPORT	4,446	2,100	2,330	4,430	(16)	-
ADULT COMMISSIONING PLACEMENTS	50,118	18,028	35,664	53,692	3,574	-
ADULT SAFEGUARDING	76	(2)	78	76	-	-
<b>TOTALS</b>	<b>63,968</b>	<b>25,167</b>	<b>42,291</b>	<b>67,458</b>	<b>3,490</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary – basis

The Revenue summary (above) lists the latest outturn projection for each individual service within the Adult Services Directorate against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with each head of service.

#### Adult Social Care

Adult Social Care is forecasting an underspend of £68k at month 5 due to a high volume of vacant positions.

#### Adult Commissioning Placements (Social Care Packages)

The Adult Commissioning Placements budget is forecasting an overspend of £3,574k. There are savings shortfalls of £1,012k from the proposal in which the Integrated Care Board (ICB) were expected to provide additional income of £1.6m into the Better Care Fund (BCF) and a further shortfall on additional funding streams of £337k. There is a pressure of £1,313k in Supported Living due to additional packages of care including children's transitions, along with £521k of pressures due to additional packages of short-term care linked to hospital discharge. An increased number of complex case packages have also created a pressure of £64k. £439k pressures relates to Out of Area Residential and Nursing Placements fee uplifts being significantly greater than forecast offset by £213k additional client contributions. There is a £286k pressure on Homecare whereby the current commissioned hours exceeds budget. Direct payment pressures of £417k are resulting from a forecasted reduction in claw-backs based on year-to-date actuals and a number of ad-hoc payments being made outside of the Mosaic Interface. There is £602k in the forecast relating to the recently announced Market Sustainability and Improvement Fund which is being used to offset the residential/nursing top-ups and Out of Area fee rates.

#### Care and Support

Care and Support is forecasting an underspend of £16k at month 5 due to slippage on vacant positions.

### **Adults Safeguarding**

Adults safeguarding is forecasting a break-even position at month 5.

### **Summary of the Adult Services financial position**

As at the end of August 2023 the Adult Services Directorate is forecasting an overall overspend of £3,490k for the financial year to March 2024 on a net budget of £64m.

### **Budget Holder – K Smith, Director of Adult Services**

## Blackpool Council – Children’s Services

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	2023/24					
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
<b>CHILDREN'S SERVICES</b>						
<b>NET EXPENDITURE</b>						
LOCAL SCHOOLS BUDGET - ISB	20,112	8,660	11,452	20,112	-	-
LOCAL SCHOOLS BUDGET - NON DELEGATED	281	155	78	233	(48)	-
EDUCATION	27,385	5,886	21,547	27,433	48	-
EARLY HELP FOR CHILDREN AND FAMILIES	182	76	106	182	-	-
BUSINESS SUPPORT AND RESOURCES	9,330	3,891	5,439	9,330	-	-
DEDICATED SCHOOL GRANT	(57,977)	(25,629)	(32,348)	(57,977)	-	-
CARRY FORWARD OF DSG UNDER/(OVER) SPEND	687	-	687	687	-	-
<b>TOTAL DSG FUNDED SERVICES</b>	-	<b>(6,961)</b>	<b>6,961</b>	-	-	-
CHILDREN'S SERVICES DEPRECIATION	1,748	-	1,748	1,748	-	-
EDUCATION	1,933	1,767	166	1,933	-	-
EARLY HELP FOR CHILDREN AND FAMILIES	5,840	1,001	4,839	5,840	-	-
CHILDREN'S SOCIAL CARE	59,079	26,461	37,861	64,322	5,243	-
BUSINESS SUPPORT AND RESOURCES	(100)	294	365	659	759	-
LOCAL SERVICES SUPPORT GRANT	(18)	-	(18)	(18)	-	-
SCHOOL IMPROVEMENT GRANT	(166)	-	(166)	(166)	-	-
<b>TOTAL COUNCIL FUNDED SERVICES</b>	<b>68,316</b>	<b>29,523</b>	<b>44,795</b>	<b>74,318</b>	<b>6,002</b>	-
<b>TOTALS</b>	<b>68,316</b>	<b>22,562</b>	<b>51,756</b>	<b>74,318</b>	<b>6,002</b>	-

### Commentary on the key issues:

#### Directorate Summary – basis

The Revenue summary (above) lists the latest outturn projection for each individual service within the Children’s Services Directorate against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with each Head of Service.

#### Children’s Social Care

The full-year impact of the Children’s Social Care pressures as at M7 2022/23 has been rightsized as part of the Corporate Medium Term Financial Plan, equating to an additional budget of £5,221k allocated in 2023/24. However, Children’s Social Care Placements is forecasting an overspend against this increased budget of £5,243k, mainly due to new-to-care placements being higher than those exiting care and the additional support required following the breakdown of high-cost placements. The actual number of residential placements as at 31st August 2023 is 74 with this forecast to reduce to 68 by 31st March 2024, whereas the plan suggested there would be 69 as at 31st August reducing to 60 by the end of March 2024.

However, the number of Children in Care continues to reduce and currently sits at 541 children. This brings Blackpool from a rate of 218 per 0-17 10,000 population to 194. The ambition is to bring ourselves in line with comparator Local Authorities over the next couple of years and we are confident that this ambition will be realised. Officers have seen this reduction as a result of reduced entry into

care, and increased numbers exiting our care system. Within the cohort of Children Looked After, the Council has had a higher than national average of children in residential placements. Residential settings, for most children, are not the optimum placement and these children do not usually have the same degree of positive outcomes as children in foster placements, or family placements for example. Residential placements are costly, with unit costs rising year on year by 14.1%. We have seen movement in the numbers of residential placements, from 84 to 74 as a result of a focussed, ongoing piece of work led by our newly recruited Head of Service for Supporting our Children. We have reviewed a number of care plans and as a result children have been moved from residential settings to settings that better meet their needs, always ensuring their safety and individual needs are at the forefront when planning.

The service has additionally seen a reduction in agency social work staff during the last 12-18 months. In 2021/2022 the service had rates of up to 40% agency staff in some teams. A refreshed Workforce Strategy, overseen by a Workforce Board, chaired monthly by the Director of Childrens Services, has seen a reduction of agency staff to under 15% across the social care teams. The national average is now 17% and regionally the rate is much higher. The last set of regional data put Blackpool at the lowest for agency rates. Officers continue to monitor this closely in a challenging and competitive market.

### **Dedicated Schools Grant Funded Services**

The Dedicated Schools Grant (DSG) is the funding stream that supports the Schools Budget, which includes amounts that are devolved through the Individual School Budget (ISB), together with centrally-retained pupil-related services as listed in the revenue summary. Any under or overspends against services funded by the DSG will be carried forward to 2024/25 and, in the case of overspends, become the first call on the grant in that year.

### **Business Support and Resources**

Business Support and Resources is forecasting an overspend of £759k. There was an additional Children's Services savings target of £1,924k, of which, only £1,165k is anticipated to be met this financial year, leaving a budget gap of £759k.

### **Summary of the Children's Services financial position**

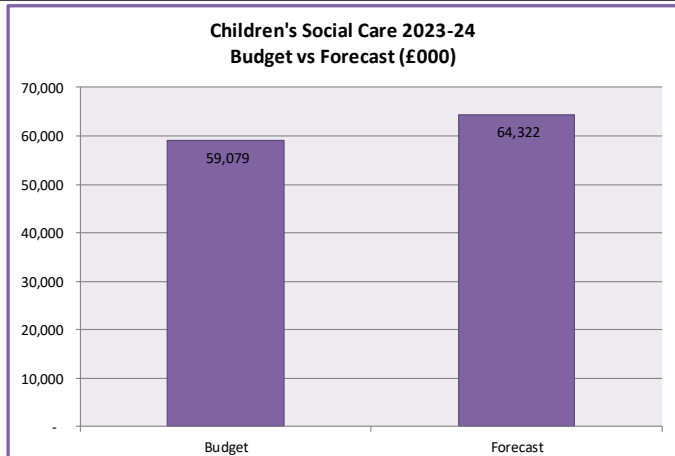
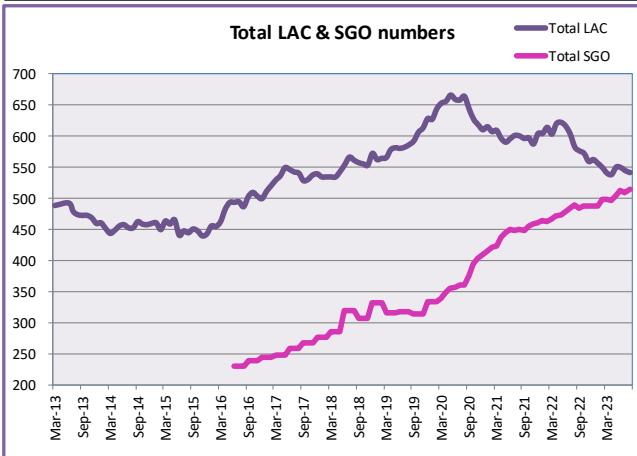
As at the end of August 2023 the Children's Services Directorate is forecasting an overspend of £6,002k for the financial year to March 2024.

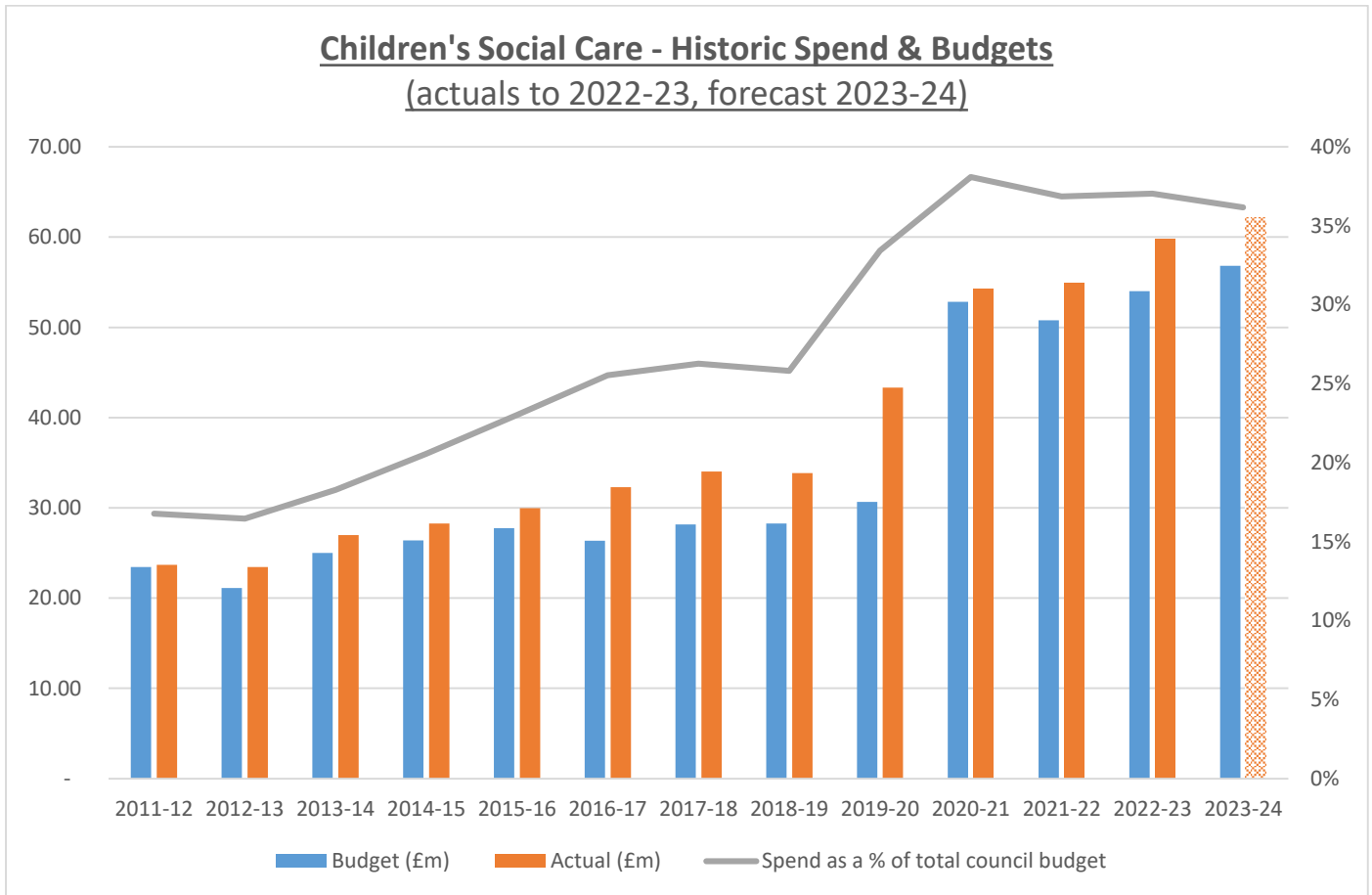
### **Budget Holder – Victoria Gent, Director of Children's Services**

Children's Social Care Trends

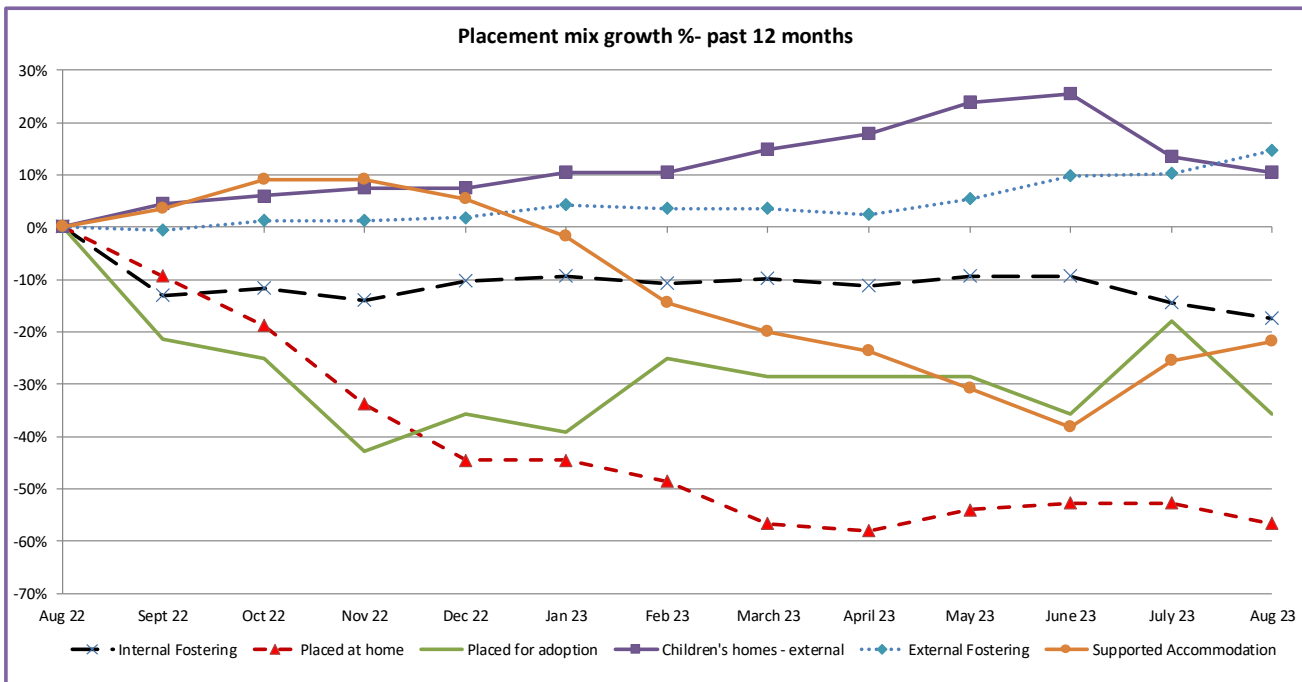
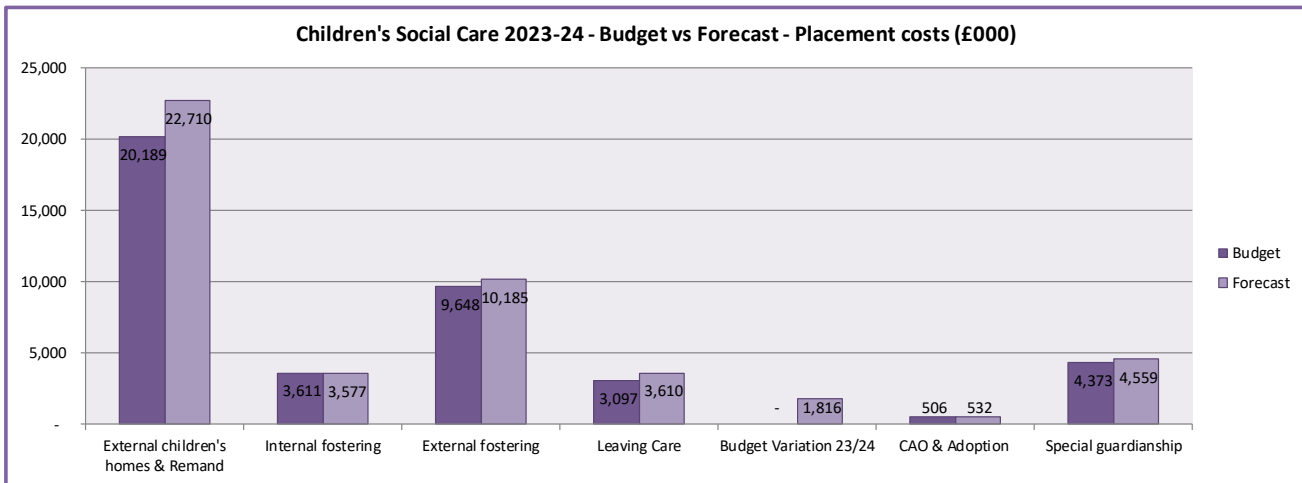
Date	External Placements Projection						Internal Fostering			Supported Accommodation			LAC number	SGO	
	Residential			Fostering inc M&B			Number	% of LAC	£ per placement	Number	% of LAC	£ per placement	No.	Number	£ per placement
	Number	% of LAC	£ per placement	Number	% of LAC	£ per placement									
Jun-13	41	8%	111,596	72	15%	36,202	263	53%	11,887	16	3%	no data	492	no data	
Sep-13	33	7%	111,523	66	14%	35,667	272	58%	11,908	17	4%	no data	472	no data	
Dec-13	30	7%	117,073	69	15%	36,560	260	57%	11,828	17	4%	no data	459	no data	
Mar-14	27	6%	118,473	64	14%	34,058	248	56%	11,757	15	3%	no data	443	no data	
Jun-14	25	5%	102,561	74	16%	35,928	250	55%	12,833	18	4%	no data	457	no data	
Sep-14	21	5%	121,210	75	16%	37,655	237	51%	12,570	27	6%	no data	462	no data	
Dec-14	18	4%	124,281	70	15%	38,760	243	53%	12,474	23	5%	no data	459	no data	
Mar-15	23	5%	128,868	73	16%	40,155	244	53%	12,374	19	4%	no data	463	no data	
Jun-15	25	6%	147,777	74	17%	40,625	219	50%	12,541	20	5%	no data	440	no data	
Sep-15	25	6%	142,934	73	16%	40,040	225	50%	12,549	16	4%	no data	451	no data	
Dec-15	27	6%	145,196	70	16%	41,243	217	49%	12,428	17	4%	no data	442	no data	
Mar-16	29	6%	146,120	69	15%	42,215	257	56%	12,453	22	5%	no data	462	no data	
Jun-16	34	7%	157,136	77	16%	42,145	259	53%	12,630	28	6%	38,608	493	230	5,472
Sep-16	32	6%	169,996	84	17%	42,750	254	51%	12,688	27	5%	41,376	502	240	5,582
Dec-16	36	7%	175,954	89	18%	43,038	258	52%	12,857	28	6%	41,037	499	245	5,562
Mar-17	44	8%	179,669	103	19%	43,502	269	51%	12,872	26	5%	42,416	529	249	5,555
Jun-17	49	9%	151,450	100	18%	40,933	272	50%	13,227	26	5%	60,946	546	258	5,576
Sep-17	35	7%	161,487	95	18%	40,991	270	51%	13,213	36	7%	57,928	528	267	5,383
Dec-17	43	8%	162,623	103	19%	41,277	272	50%	13,169	36	7%	58,358	539	277	5,281
Mar-18	44	8%	165,935	98	18%	41,099	273	51%	13,116	30	6%	55,728	534	286	5,109
Jun-18	45	8%	164,794	97	18%	40,083	297	54%	13,403	24	4%	48,006	554	320	5,512
Sep-18	45	8%	159,388	97	17%	40,425	302	54%	13,441	28	5%	46,073	557	308	5,294
Dec-18	47	8%	169,287	99	17%	40,227	305	53%	13,430	33	6%	46,167	572	332	5,175
Mar-19	53	9%	177,477	94	17%	39,536	306	54%	13,289	23	4%	45,845	565	317	5,238
Jun-19	53	9%	172,929	107	18%	42,426	305	53%	13,014	26	4%	68,367	580	318	5,988
Sep-19	58	10%	180,014	116	20%	43,981	294	50%	12,649	32	5%	56,148	592	315	5,693
Dec-19	62	10%	184,396	145	23%	45,812	300	48%	12,854	31	5%	60,289	628	334	5,670
Mar-20	65	10%	183,892	167	26%	45,201	292	45%	13,166	33	5%	61,076	653	339	5,624
Jun-20	69	10%	207,288	175	27%	47,565	284	43%	12,877	32	5%	92,575	659	357	5,882
Sep-20	75	12%	211,328	173	27%	47,125	277	43%	12,979	30	5%	97,225	644	376	6,056
Dec-20	72	12%	209,062	178	29%	47,361	248	41%	14,343	32	5%	105,274	610	410	6,551
Mar-21	72	12%	209,953	189	31%	47,883	230	38%	14,234	25	4%	107,561	609	424	6,685
Jun-21	68	11%	225,246	200	34%	45,809	213	36%	16,619	26	4%	78,324	596	450	7,650
Sep-21	64	11%	229,272	194	33%	47,303	221	37%	17,059	39	7%	70,834	596	448	7,752
Dec-21	66	11%	238,266	186	31%	47,535	219	36%	17,064	40	7%	68,328	604	461	7,884
Mar-22	70	12%	247,935	184	30%	47,718	214	35%	17,348	47	8%	68,576	608	467	8,076
Jun-22	69	11%	251,588	174	28%	50,006	221	36%	17,030	50	8%	74,397	616	479	8,093
Sep-22	70	12%	255,469	164	28%	48,674	193	34%	16,646	57	10%	72,203	576	484	8,186
Dec-22	72	13%	264,844	168	30%	52,295	199	35%	16,770	58	10%	69,007	562	487	8,175
Mar-23	77	14%	267,333	171	32%	52,073	200	37%	16,785	44	8%	67,462	540	499	8,205
Apr-23	79	15%	277,464	169	31%	57,959	197	37%	18,853	42	8%	79,291	538	497	8,841
May-23	83	15%	283,061	174	32%	56,809	201	37%	18,793	38	7%	77,678	550	504	8,869
Jun-23	84	15%	287,055	181	33%	56,473	201	37%	19,532	34	6%	75,503	549	513	8,873
Jul-23	76	14%	294,796	182	33%	54,787	190	35%	19,011	41	8%	70,674	544	509	8,906
Aug-23	74	14%	298,544	189	35%	55,820	183	34%	19,424	43	8%	69,042	541	514	8,906

**Note:**  
The variance between the current total number of Looked After Children (541) and the total internal fostering and external placement numbers (489) is children with care orders, adoption placements etc. They are still classed as LAC but do not incur any commissioned costs. SGO = Special Guardianship Order.









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## Blackpool Council – Public Health

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD £000
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	2023/24		F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
			PROJECTED SPEND £000	FORECAST OUTTURN £000		
<b>PUBLIC HEALTH</b>						
<b>NET EXPENDITURE</b>						
PUBLIC HEALTH DIRECTORATE & CORPORATE SUPPORT	1,353	(15,113)	16,466	1,353	-	-
NHS HEALTH CHECKS - MANDATED	100	100	-	100	-	-
CHILDREN (5-19) - PUBLIC HEALTH PROGRAMMES	617	209	408	617	-	-
CHILDREN'S 0-5 SERVICES	2,520	891	1,629	2,520	-	-
TOBACCO CONTROL	374	158	216	374	-	-
MENTAL HEALTH AND WELLBEING	15	-	15	15	-	-
SEXUAL HEALTH SERVICES - MANDATED	1,845	613	1,232	1,845	-	-
SUBSTANCE MISUSE (DRUGS AND ALCOHOL)	2,744	929	1,815	2,744	-	-
HARM REDUCTION (SEXUAL HEALTH, DRUGS AND ALCOHOL)	773	184	589	773	-	-
HEALTHY WEIGHT/WEIGHT MANAGEMENT	267	123	144	267	-	-
MISCELLANEOUS PUBLIC HEALTH SERVICES	9,253	49	9,204	9,253	-	-
GRANT	(19,858)	(4,965)	(14,893)	(19,858)	-	-
<b>TOTALS</b>	<b>3</b>	<b>(16,822)</b>	<b>16,825</b>	<b>3</b>	<b>-</b>	<b>-</b>

### Commentary on the key issues:

#### Directorate Summary – basis

The Revenue summary (above) lists the latest outturn projection for each individual scheme against their respective, currently approved, revenue budget. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and efficiencies in the remainder of the financial year, all of which have been agreed with the service leads.

#### Public Health Grant

The Public Health Grant is a central government grant which is ring-fenced.

The grant conditions require quarterly financial reporting of spend against a prescribed set of headings and spend of the grant must link explicitly to the Health and Wellbeing Strategy, Public Health Outcomes Framework and Joint Strategic Needs Assessment.

The Public Health Directorate are forecasting an overall spend of the full grant, £19,858,394, for the financial year to March 2024.

#### Payment by Results (PbR)/ Activity-based Commissioning

A number of Public Health schemes' payments are linked to activity. The aim of Payment by Results (PbR) is to provide a transparent, rules-based system for payment. It rewards outputs, outcomes and supports patient choice and diversity. Payment will be linked to activity. This does, however, raise a number of challenges when determining accurate budgetary spend/forecast spend.

**Summary of the Public Health Directorate financial position**

As at the end of August 2023, the Public Health Directorate are forecasting a break-even position for the financial year to March 2024.

**Budget Holder – Dr Arif Rajpura, Director of Public Health**

## Blackpool Council – Budgets Outside the Cash Limit

### Revenue summary - budget, actual and forecast:

FUNCTIONS OF THE SERVICE	BUDGET	EXPENDITURE			VARIANCE	2022/23 (UNDER)/OVER SPEND B/FWD  £000
	2023/24					
	ADJUSTED CASH LIMITED BUDGET £000	EXPENDITURE APR - AUG £000	PROJECTED SPEND £000	FORECAST OUTTURN £000	F/CAST FULL YEAR VAR. (UNDER) / OVER £000	
<b>BUDGETS OUTSIDE THE CASH LIMIT</b>						
<b>NET EXPENDITURE</b>						
TREASURY MANAGEMENT	13,254	(2,031)	13,700	11,669	(1,585)	-
PARKING SERVICES	(5,505)	(2,023)	(3,382)	(5,405)	100	-
CORPORATE SUBSCRIPTIONS	135	88	47	135	-	-
HOUSING BENEFITS	1,850	785	1,065	1,850	-	-
COUNCIL TAX & NNDR COST OF COLLECTION	1,894	792	1,102	1,894	-	-
SUBSIDIARY COMPANIES	(929)	(47)	(917)	(964)	(35)	-
LAND CHARGES	(50)	(24)	(26)	(50)	-	-
CONCESSIONARY FARES	4,065	349	3,716	4,065	-	-
EMPLOYERS PREVIOUS YEARS' PENSION LIABILITY	(957)	(399)	(558)	(957)	-	-
NEW HOMES BONUS	(22)	(11)	(11)	(22)	-	-
<b>TOTALS</b>	<b>13,735</b>	<b>(2,521)</b>	<b>14,736</b>	<b>12,215</b>	<b>(1,520)</b>	-

### Commentary on the key issues:

#### Directorate Summary - basis

The Revenue summary (above) lists the latest outturn projection for each individual service categorised as falling 'outside the cash limit' and thereby exempt from the cash limited budget regime. Forecast outturns are based upon actual financial performance for the first 5 months of 2023/24 together with predictions of performance, anticipated pressures and savings in the remainder of the financial year, which have been agreed by each designated budget manager.

#### Treasury Management

Treasury Management is forecasting an underspend of £1,466k. This figure includes £2,184k of prudential recharges to services and means that the £150k savings target will be met in 2023/24 and an increase in interest received from investments providing additional income of £191k. Offset against this is £844k pressure relating to higher interest rates on temporary borrowing and a reduction in the interest charge to the Housing Revenue Account as less borrowing is required in 2023/24 than originally budgeted. However, interest rates are predicted to increase over the duration of the financial year and these increases are likely to have a negative impact on the current position of the service. The Council is currently using 50:50 temporary and long-term borrowing to finance prudentially-funded capital expenditure and this gearing is under continual review by the Treasury Management Panel.

The Business Loans Fund has a savings target of £154k and is forecasting a surplus of £119k as new business loans have been awarded at higher repayment rates than originally forecast for 2023/24. This underspend has reduced from M4 as interest rates have been increased from 4.5% to 5% in the forecast.

Following a review of the Minimum Revenue Provision (MRP), which was approved by the Executive on 8<sup>th</sup> February 2021, a total of £5,158k of saving has been forecast to be achieved in 2023/24.

## **Parking Services**

Parking Services is forecasting a £100k overspend position for 2023/24. This pressure is due to lower than budgeted income. The service's ability to hold this position will depend on the impact of the cost of living crisis, the quality of the October holiday season and the availability of parking due to regeneration projects within the town.

As at Week 26 (w/e 24<sup>th</sup> September) parking income is at £3.5m with patronage at 666,814. Car Park patronage is down by 4,670 and income up by £71k on 2022/23. On-Street Pay and Display patronage is down by 4,113 and income up by £8k.

The graphs below show, for comparison, the patronage and income figures for 2022/23 and 2023/24.

## **Housing Benefit**

This service is forecasting a break-even position.

## **Council Tax and NNDR Cost of Collection**

This service is forecasting a break-even position.

## **Subsidiary Companies**

This service is forecasting a £35k saving due to reduction in charges, mainly relating to debt management.

## **Land Charges**

This service is forecasting a break-even position.

## **Concessionary Fares**

This service is forecasting a break-even position.

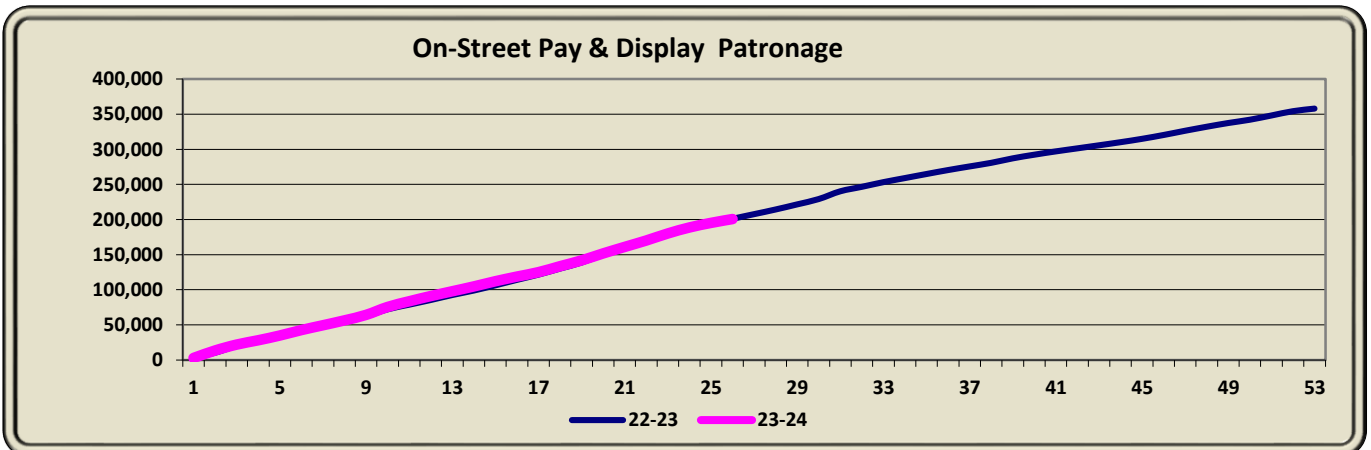
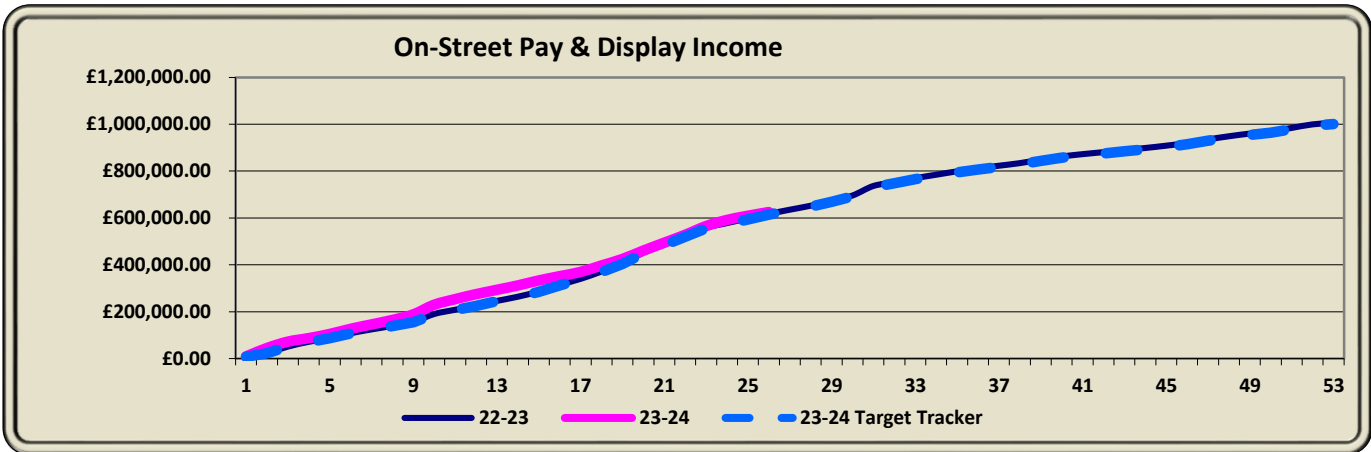
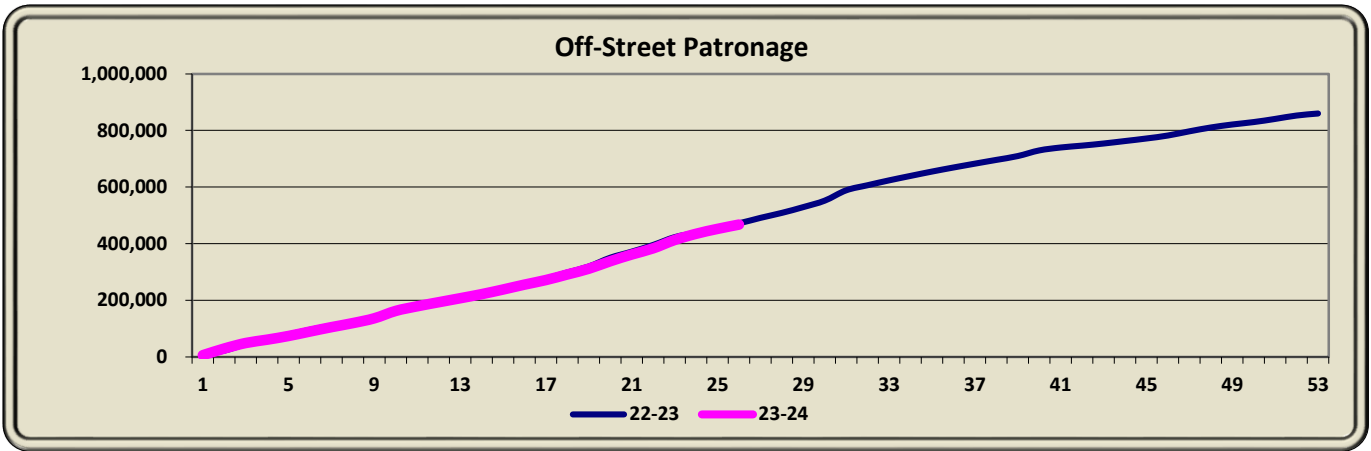
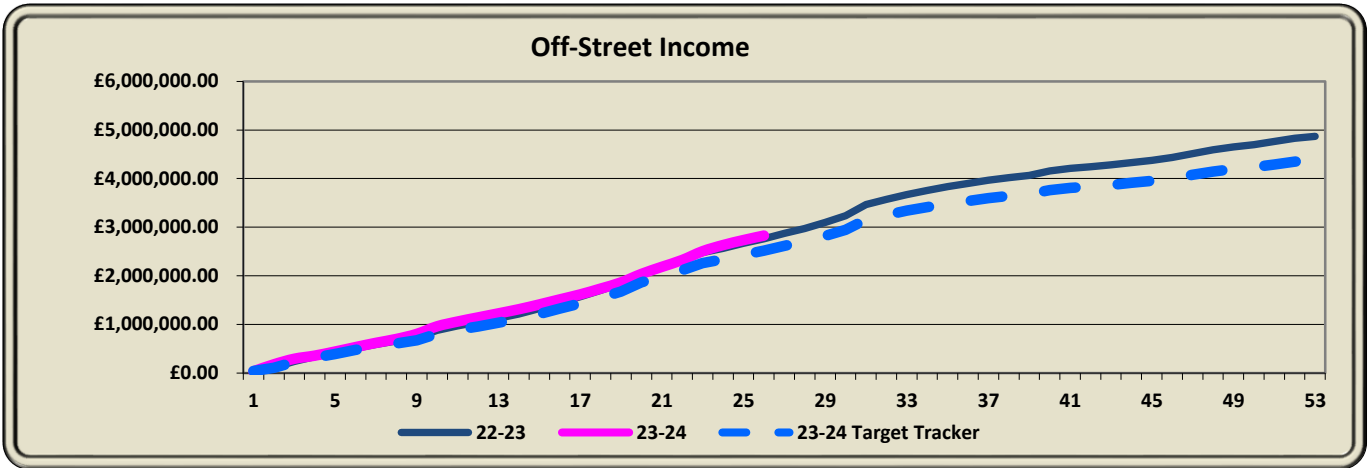
## **New Homes Bonus**

This service is forecasting break-even position.

## **Summary of the revenue forecasts**

After 5 months of the financial year, the Budgets Outside the Cash Limit services are forecasting a £1,520k underspend.

**Car Parking Trends**



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# HOUSING REVENUE ACCOUNT

Appendix 2 (n)

## BUDGET MONITORING MONTH 5 2023/2024

FUNCTIONS	2023/2024 BUDGET MONTH 5	2023/2024 ACTUAL MONTH 5	2023/2024 VARIANCE MONTH 5	2023/2024 FULL YEAR BUDGET	2023/2024 PROJECTED OUTTURN	2023/2024 VARIATION
	£000	£000	£000	£000	£000	£000
<b><u>RENT &amp; SERVICE CHARGE INCOME DUE</u></b>						
Rental Income	8,530	8,431	(99)	19,497	19,362	(135)
Sheltered Housing	321	319	(2)	734	728	(6)
Emergency Housing	283	298	15	668	704	36
Resilience Housing	104	106	2	542	542	-
Other Supported Housing	89	73	(16)	204	168	(36)
Satellite Television Systems	35	35	-	80	80	-
Community Cleaning	12	12	-	27	27	-
Community Lighting	14	14	-	33	33	-
Door Entry Systems	4	4	-	9	9	-
Gardening Scheme	29	29	-	67	67	-
Grounds Maintenance	111	111	-	253	253	-
<b><u>OTHER RENTS &amp; CHARGES</u></b>						
Garages	38	38	-	86	86	-
Leasehold	95	105	10	189	189	-
Commercial/Other Rents	30	33	3	72	72	-
Other Income	50	93	43	120	120	-
<b><u>INTEREST INCOME</u></b>						
Interest on Revenue Balances	-	-	-	185	185	-
<b>TOTAL INCOME</b>	<b>9,745</b>	<b>9,701</b>	<b>(44)</b>	<b>22,766</b>	<b>22,625</b>	<b>(141)</b>
MANAGEMENT FEE	4,928	4,928	-	11,826	11,826	-
GENERAL FUND SERVICES	-	-	-	2,114	2,114	-
OTHER HRA COSTS	-	-	-	30	30	-
CAPITAL CHARGES	-	-	-	8,681	8,681	-
PROVISION FOR BAD AND DOUBTFUL DEBTS	-	-	-	384	384	-
<b>TOTAL EXPENDITURE</b>	<b>4,928</b>	<b>4,928</b>	<b>-</b>	<b>23,035</b>	<b>23,035</b>	<b>-</b>
<b>CONTRIBUTION TO / (FROM) WORKING BALANCES</b>	<b>4,817</b>	<b>4,773</b>	<b>(44)</b>	<b>(269)</b>	<b>(410)</b>	<b>(141)</b>

WORKING BALANCES	2023/2024 FULL YEAR BUDGET	2023/2024 PROJECTED OUTTURN	2023/2024 VARIATION
	£000	£000	£000
BALANCE AT 1ST APRIL	1,399	1,721	322
CONTRIBUTION TO / (FROM) WORKING BALANCES	(269)	(410)	(141)
BALANCE AT 31ST MARCH	1,130	1,311	181

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## Blackpool Council

### Wholly-Owned Companies

#### Covid Support to Council Wholly-Owned Companies

The Coronavirus pandemic led to a number of Council Wholly-Owned Companies (WOCs) facing significant income losses as a result of lockdown and subsequent social distancing restrictions. This impacted both company profitability and cashflow. It looked likely that without Council support some would not be able to recover within a reasonable timeframe, which could leave the Council without an operator for assets of significant financial value and importance to the town and its tourist economy.

In November 2020 the Executive approved the establishment of a £24m Covid Recovery Fund (PH46/2020), £20m plus a 20% contingency, ringfenced for WOCs only, from within the existing Business Loans Fund.

To be eligible to access the Covid Recovery Fund facility companies needed to produce a 5-year Covid recovery plan (2020/21 year + 4) and to demonstrate a cumulative break-even income and expenditure position by the end of year 5 of their recovery plan, or as close as possible to this term.

Loans were offered at a fixed rate over 5 years, thereby providing the WOCs with certainty over future repayments requirements and were tailored to the individual circumstances of the company and its recovery plan, offers being made on either an interest-only basis with balloon principal repayment or with monthly repayments of interest and principal.

To date there have been loan approvals of £16.11m against that facility of which £9.52m has been drawn down. £2.20m of this has subsequently been repaid. The Council's Business Loans Fund Panel monitors progress against the WOCs' respective recovery plans on a regular basis.

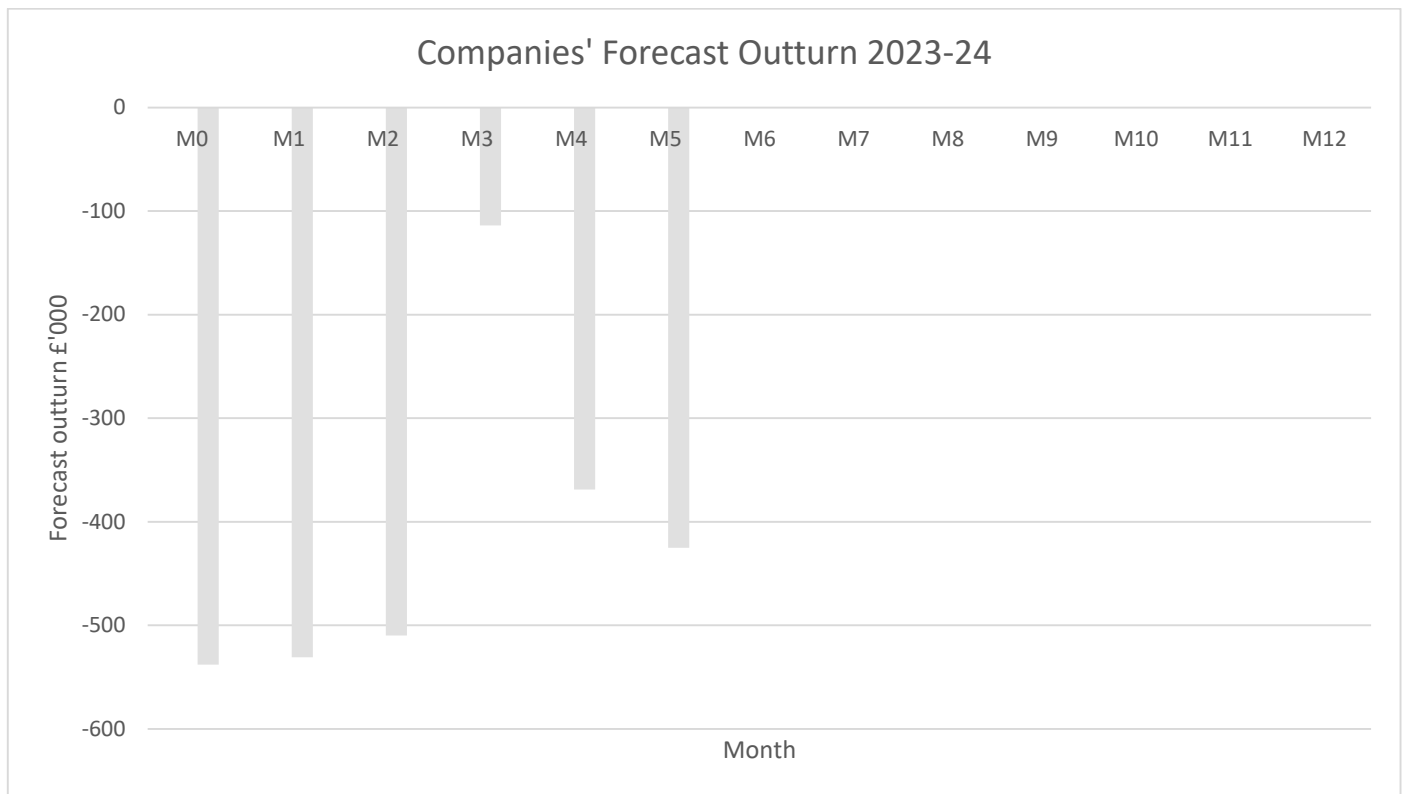
#### Non Covid-related loan support to WOCs

The Council also supports its WOCs' capital spending (capex) requirements where there is a robust business case demonstrating either a valid 'Spend to Save' initiative or an opportunity to spend to generate income. The Council's exposure to principal and capitalised interest in respect of such WOC capex loans is currently £45.49m.

There are currently no short-term cash flow loans outstanding in respect of Council Wholly-owned companies.

#### Wholly-owned companies financial performance as at Month 5 2023/24

The consolidated forecast financial position of the Council's wholly-owned subsidiary companies is a loss of £0.425m based on their Month 5 financial monitoring reports. This represents a deterioration of £0.056m from the position reported at Month 4. This comprises a deterioration in forecast income offset, in part, by reduced expenditure forecasts.



The Council has taken advice from CIPFA regarding the proper accounting treatment in respect of company forecast losses. CIPFA has advised that the Council does not need to include the forecast losses in its forecast revenue outturn; the company losses will be included in the Council's consolidated financial position.

# Blackpool Council

## Budget Savings Target 2023/24

Summary of progress as at 31<sup>st</sup> August 2023.

	Target	Achieved	Not yet achieved	To be achieved before year-end	Not able to be achieved	Amount of saving not yet found recurrently
	£000	£000	£000	£000	£000	£000
<b><u>Recurrent Savings</u></b>						
Corporate Services	12,975	(11,269)	<b>1,706</b>	(1,706)	<b>0</b>	<b>9,946</b>
Adult Services	3,337	(1,908)	<b>1,429</b>	0	<b>1,429</b>	<b>1,429</b>
Chief Executive	159	(110)	<b>49</b>	(49)	<b>0</b>	<b>0</b>
Children's Services	2,044	0	<b>2,044</b>	(1,278)	<b>766</b>	<b>1,494</b>
Governance & Partnership Services	507	(91)	<b>416</b>	(366)	<b>50</b>	<b>0</b>
Community & Environmental Services	367	0	<b>367</b>	(367)	<b>0</b>	<b>0</b>
Outside Cash Limit	1,349	(275)	<b>1,074</b>	(974)	<b>100</b>	<b>0</b>
Public Health	0	0	<b>0</b>	0	<b>0</b>	<b>0</b>
Communications & Regeneration	497	(232)	<b>265</b>	(265)	<b>0</b>	<b>0</b>
Growth & Prosperity	1,510	0	<b>1,510</b>	(1,510)	<b>0</b>	<b>0</b>
Resources	650	(475)	<b>175</b>	(175)	<b>0</b>	<b>0</b>
<b>Recurrent Saving</b>	<b>23,395</b>	<b>(14,360)</b>	<b>9,035</b>	<b>(6,690)</b>	<b>2,345</b>	<b>12,869</b>

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2023/24 CAPITAL MONITORING  
MONTH 5

Forecast scheme variance undeterminable at this stage Key:

	£000	Spend as at 31/3/23 £000	Budget Brought Forward 2022/23 £000	Capital Programme 2023/24 £000	Total Available Budget 2023/24 £000	Spend to Date April - Aug £000	Forecast to Year End £000	Forecast Variance £000
<b>Director Responsible for Resources</b>								
<b>Property and Asset Management</b>								
Central Business District Phase 1	40,432	38,142	2,290	-	2,290	-	2,290	-
ICT Refresh	924	-	-	924	924	232	692	-
Core CCTV Replacement	2,000	1,179	821	-	821	40	781	-
Finance, HR, Payroll System	3,225	2,535	187	503	690	440	250	-
Central Library/ Grundy Gallery Roof	525	188	337	-	337	279	58	-
South King Street	597	320	277	-	277	249	28	-
Other Resources Schemes	828	-	208	620	828	137	691	-
<b>Total Resources</b>	<b>48,531</b>	<b>42,364</b>	<b>4,120</b>	<b>2,047</b>	<b>6,167</b>	<b>1,377</b>	<b>4,790</b>	<b>-</b>
<b>Director Responsible for Adult Services</b>								
Support to Vulnerable Adults - Grants	2,384	-	398	1,986	2,384	709	1,675	-
I-Switch	-	-	-	-	-	-	-	-
Other Adult Services Schemes	2,561	1,233	770	558	1,328	528	800	-
<b>Total Adult Services</b>	<b>4,945</b>	<b>1,233</b>	<b>1,168</b>	<b>2,544</b>	<b>3,712</b>	<b>1,237</b>	<b>2,475</b>	<b>-</b>
<b>Director Responsible for Community and Environmental Services</b>								
Anchorsholme Seawall	30,966	26,632	4,334	-	4,334	8	4,326	-
Coastal Protection Strategy 2021-2025	61,265	1,206	94	7,790	7,884	2	7,882	-
Coastal Protection Studies	4,520	3,562	958	-	958	115	843	-
Beach Nourishment	57,010	-	-	500	500	17	483	-
Others	1,101	498	396	207	603	557	46	-
<b>Total Community and Environmental Services</b>	<b>154,862</b>	<b>31,898</b>	<b>5,782</b>	<b>8,497</b>	<b>14,279</b>	<b>699</b>	<b>13,580</b>	<b>-</b>

**2023/24 CAPITAL MONITORING  
MONTH 5**

		Spend as at 31/3/23	Budget Brought Forward 2022/23	Capital Programme 2023/24	Total Available Budget 2023/24	Spend to Date April - Aug	Forecast to Year End	Forecast Variance
	£000	£000	£000	£000	£000	£000	£000	£000
<b>Chief Executive</b>								
<b>Housing</b>								
Foxhall Village	12,797	13,471	(674)	-	(674)	1	(675)	-
Work towards Decent Homes Standard	3,985	-	-	3,985	3,985	1,249	2,736	-
Queens Park Redevelopment Ph2	13,453	13,453	-	-	-	(386)	386	-
Troutbeck Redevelopment	11,970	11,675	295	-	295	(81)	376	-
Grange Park	24,206	11,776	190	12,240	12,430	4,370	8,060	-
Dunsop Court	1,233	1,227	6	-	6	47	(41)	-
Feasibility/ Infill site	2,750	231	2,389	130	2,519	-	2,519	-
Haweside Masterplan	562	82	480	-	480	-	480	-
Garstang Road West	3,495	3,495	-	-	-	(133)	133	-
Acquisition and Refurbishment	4,871	1,775	3,096	-	3,096	(3)	3,099	-
Others	7,101	-	-	7,101	7,101	130	6,971	-
<b>Total Chief Executive</b>	<b>86,423</b>	<b>57,185</b>	<b>5,782</b>	<b>23,456</b>	<b>29,238</b>	<b>5,194</b>	<b>24,044</b>	<b>-</b>
<b>Director Responsible for Communications and Regeneration</b>								
<b>Regeneration</b>								
College Relocation/Illumination Depot	13,505	13,924	(519)	100	(419)	-	(419)	-
Leisure Assets	68,579	66,346	2,233	-	2,233	806	1,427	-
Conference Centre	30,562	31,025	(463)	-	(463)	9	(472)	-
CBD Phase 2 - Hotel	24,500	24,213	287	-	287	2,852	(2,565)	-
CBD Phase 3	99,750	14,631	85,119	-	85,119	12,468	72,651	-
Land Release Fund	3,204	845	2,359	-	2,359	205	2,154	-
Enterprise Zone	29,720	15,123	14,597	-	14,597	394	14,203	-
Town Centre Parking Strategy	16,000	1,889	14,111	-	14,111	-	14,111	-
Museum	9,653	8,016	1,637	-	1,637	1,312	325	-
Abingdon Street Market	3,634	4,067	(433)	-	(433)	159	(592)	-
HoundsHill Ph2	20,190	13,879	6,311	-	6,311	2,830	3,481	-
Heritage Action Zone	1,566	1,179	387	-	387	84	303	-
Devonshire Road Hospital Land	1,447	1,447	-	-	-	-	-	-
Town Deal	57,190	5,888	51,302	-	51,302	3,291	48,011	-
Land Acqn Alfred, Leopold & Adelaide Streets	1,790	1,787	3	-	3	4	(1)	-
Marks and Spencers Acquisition	4,800	4,687	113	-	113	-	113	-
Town Centre Investments	57,100	51,208	5,892	-	5,892	(100)	5,992	-
Multi-Storey Car Park	1,782	-	-	1,782	1,782	221	1,561	-
<b>Transport</b>								
Local Transport Plan 2021/22	2,630	2,630	-	-	-	-	-	-
Local Transport Plan Project 30 2021/22	283	283	-	-	-	-	-	-
Local Transport Plan 2022/23	2,690	413	2,277	-	2,277	669	1,608	-
Local Transport Plan Project 30 2022/23	223	223	-	-	-	-	-	-
Local Transport Plan 2023/24	2,690	-	-	2,690	2,690	-	2,690	-
Local Transport Plan Project 30 2023/24	223	-	-	223	223	-	223	-
Blackpool/Fleetwood Tramway	99,990	99,990	-	-	-	-	-	-
Tramway Extension	17,054	16,780	274	-	274	356	(82)	-
Tramway Refurbishment	1,053	713	340	-	340	-	340	-
<b>Total Communications and Regeneration</b>	<b>571,808</b>	<b>381,186</b>	<b>185,827</b>	<b>4,795</b>	<b>190,622</b>	<b>25,560</b>	<b>165,062</b>	<b>-</b>



**2023/24 CAPITAL MONITORING  
MONTH 5**

		Spend as at 31/3/23	Budget Brought Forward 2022/23	Capital Programme 2023/24	Total Available Budget 2023/24	Spend to Date April - Aug	Forecast to Year End	Forecast Variance
	£000	£000	£000	£000	£000	£000	£000	£000
<b>Director Responsible for Children's Services</b>								
Devolved Capital to Schools	846	711	135	-	135	14	121	-
Park Expansion	610	412	198	-	198	-	198	-
Basic Need	1,309	3	933	373	1,306	-	1,306	-
Condition	1,878	527	845	506	1,351	28	1,323	-
Highfurlong Expansion	4,800	-	-	4,800	4,800	178	4,622	-
Pegasus Expansion	800	9	791	-	791	-	791	-
Others	1,852	152	611	1,089	1,700	98	1,602	-
<b>Total Children's Services</b>	<b>12,095</b>	<b>1,814</b>	<b>3,513</b>	<b>6,768</b>	<b>10,281</b>	<b>318</b>	<b>9,963</b>	<b>-</b>
<b>CAPITAL TOTAL</b>	<b>878,664</b>	<b>515,680</b>	<b>206,192</b>	<b>48,107</b>	<b>254,299</b>	<b>34,385</b>	<b>219,914</b>	<b>-</b>

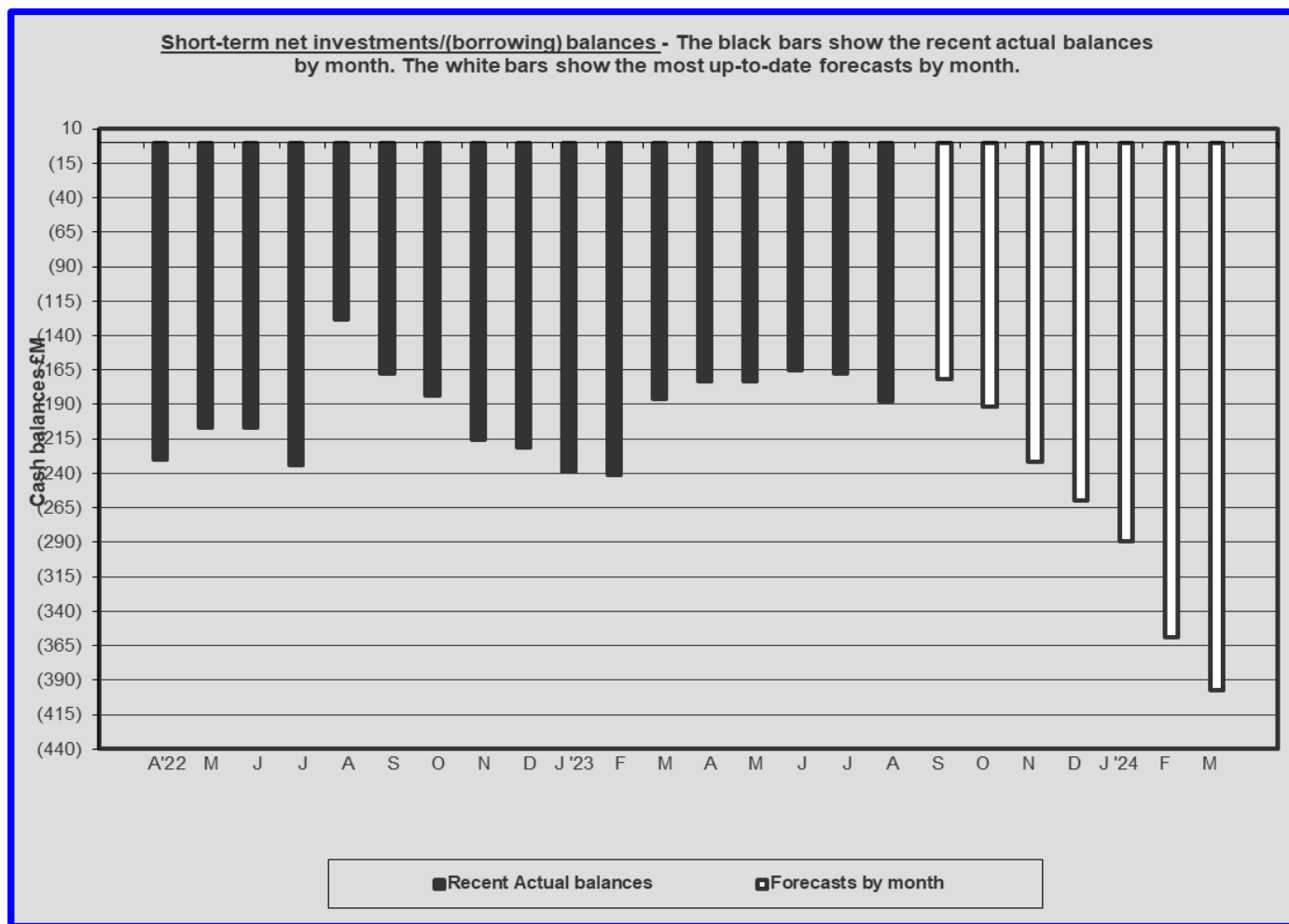
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# Blackpool Council

## Cash summary - budget, actual and forecast:

CASH FLOW - SUMMARY - 23/24							
FULL YEAR CASH FLOW ORIGINAL BUDGET (*)	APR-AUG CASH FLOW ORIGINAL BUDGET (*)	APR-AUG CASH FLOW ACTUAL	SEP-MAR CASH FLOW FORECAST	(*) THE CASH FLOW BUDGET IS CONSISTENT WITH THE REVENUE BUDGET AND THE CAPITAL PROGRAMME IN TOTAL. THE BUDGETED CASH FLOW PHASING IS BASED ON DETAILED EXPECTATIONS AND PAST EXPERIENCE	APR-AUG MORE / (LESS) CASH ACTUAL vs ORIGINAL BUDGET	SEP-MAR MORE / (LESS) CASH FORECAST vs ORIGINAL BUDGET	FULL YEAR MORE / (LESS) AS NOW FORECAST vs ORIGINAL BUDGET
£M	£M	£M	£M		£M	£M	£M
42	17	14	24	<b>RECEIPTS</b>	(3)	(1)	(4)
118	52	44	64	Housing Benefit & Subsidy	(8)	(2)	(10)
22	9	9	15	Council tax and NNDR	-	2	2
46	20	48	24	VAT	28	(2)	26
136	29	86	73	RSG & BRR	57	(34)	23
149	61	64	86	Other Grants	3	(2)	1
-	-	-	-	Other Income	-	-	-
25	25	111	40	Money Market Transactions Received	86	40	126
				Receipt of Loans			
538	213	376	326	<b>RECEIPTS - NORMAL ACTIVITIES</b>	163	1	164
12	5	5	8	<b>PAYMENTS</b>	-	(1)	(1)
430	163	192	246	Police & Fire	(29)	21	(8)
-	-	-	-	General Creditors	-	-	-
127	53	53	74	RSG & BRR	-	-	-
37	16	14	21	Salaries & wages	2	-	2
-	-	-	-	Housing Benefits	-	-	-
606	237	264	349	Money Market Transactions Paid Out	(27)	20	(7)
				<b>PAYMENTS - NORMAL ACTIVITIES</b>			
<b>(68)</b>	<b>(24)</b>	<b>112</b>	<b>(23)</b>	<b>NET CASH FLOW IN/(OUT)</b>	<b>136</b>	<b>21</b>	<b>157</b>
A	B	C	D		= C less B	= D less (A-B)	

## Cash - short-term net investments/(borrowing) balances:



**Commentary on Cash Movements during the year:**

The summary on the previous page provides a comparison of the actual cash receipts and payments compared to the forecasted cash receipts and payments.

During the first five months of the year, the Council's net cashflow resulted in fluctuations in short-term net investment/borrowing balances due to the receipt of up-front grant income in this financial year. The Council fixed £125m of temporary loans in August 2022 at around 3.0%, which resulted in an increase in investment balances and over the next few months, short-term borrowing will be repaid using the fixed-term borrowing taken.

The chart of actual and forecast month-end balances shows temporary investment and borrowing levels throughout the year. The forecast shows the level of borrowing that may be required to cover planned and approved capital expenditure up to 31<sup>st</sup> March 2024. However, it is likely that the council will take out some long-term borrowing to cover some of this expenditure part way through 2023/24.

## Blackpool Council

Balance Sheet / Working Capital:

BALANCE SHEET 2023/24				
LAST Y/END		CURRENT	CHANGE	NEXT Y/END
Draft Unaudited 31 Mar 23		31 Aug 23 Actual	Movement since 31 Mar 23	31 Mar 24 Forecast
£000s		£000s	£000s	£000s
588,919	Property, Plant and Equipment	622,279	33,360	789,654
279,731	Infrastructure Assets	280,756	1,025	266,910
8,540	Heritage Assets	8,540	-	8,600
2,401	Intangible Assets	2,344	(57)	2,171
27,399	Long-term Investments	28,399	1,000	29,650
77,306	Long-term Debtors	80,527	3,221	81,353
	Current Assets			
76,398	Debtors	81,300	4,902	75,000
836	Inventories	897	61	850
14,284	Cash and cash equivalents	11,373	(2,911)	15,000
<b>1,075,814</b>	<b>Total Assets</b>	<b>1,116,415</b>	<b>40,601</b>	<b>1,269,188</b>
	Current Liabilities			
(200,475)	Borrowing Repayable within 12 months	(191,400)	9,075	(200,000)
(81,762)	Creditors	(78,900)	2,862	(82,000)
	Long-term Liabilities			
(196,052)	Borrowing Repayable in excess of 12 months	(196,052)	-	(185,000)
(90,961)	Long-term Creditors	(90,961)	-	(88,131)
(50,576)	Capital Grants in Advance	(50,576)	-	(40,000)
(6,106)	Provisions	(6,152)	(46)	(6,100)
(62)	Other Long-term Liabilities	(62)	-	(62)
<b>449,820</b>	<b>Total Assets less Liabilities</b>	<b>502,312</b>	<b>52,492</b>	<b>667,895</b>
(82,888)	Usable Reserves	(68,461)	14,427	(68,944)
(366,932)	Unusable Reserves	(433,851)	(66,919)	(598,951)
<b>(449,820)</b>	<b>Total Reserves</b>	<b>(502,312)</b>	<b>(52,492)</b>	<b>(667,895)</b>

Commentary on the key issues:

In order to provide a complete picture of the Council's financial performance, the above table provides a snapshot of the General Fund balance sheet as at the end of month 5. The key areas of focus are any significant movements in debtors, cash and cash equivalents, bank overdraft and creditors as these impact upon the Council's performance in the critical areas of debt recovery, treasury management and Public Sector Payment Policy.

The balance sheet has been prepared under International Financial Reporting Standards (IFRS/IAS's). Each year an accounting adjustment under IAS 19 is made for the value of the pension fund at year-end. In 2022/23, for the first time, this produced a pension asset rather than a pension liability. Based on the latest advice from the Pension Fund the Council has not recognised the pension asset. However this is currently under review and therefore the figure is subject to change. Any change will also affect the unusable reserves. Usable reserves include unallocated General Fund reserves and revenue reserves. Unusable reserves are those that the Council is not able to use to provide services. This category includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets were sold.

Due to statutory changes regarding the accounting treatment of infrastructure assets which were approved in Parliament in late November 2022, the 2020/21 and 2021/22 accounts have not yet been signed off by the Council's external auditor. The audits are still ongoing and as soon as they are completed the 2022/23 balance sheet may require amendment, therefore the figures above should be treated as draft.

Over the 5-month period there has been an increase in Property, Plant and Equipment of £33.4m due to capital expenditure which is in line with the Council's approved capital programme for 2023/24. Short-term borrowing has reduced by £9.1m due to the timing of capital and revenue grants.

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Steve Thompson, Director of Resources
<b>Relevant Cabinet Member:</b>	Councillor Lynn Williams, Leader of the Council
<b>Date of Meeting:</b>	6 November 2023

## TREASURY MANAGEMENT HALF-YEARLY PROGRESS REPORT TO THE 30 SEPTEMBER 2023

### 1.0 Purpose of the report:

1.1 The Treasury Management Half-Yearly Progress Report for the year ended 30th September 2023 and its Appendices.

### 2.0 Recommendation(s):

2.1 To note the report concerning the Treasury Management activities for the six months to September 2023.

### 3.0 Reasons for recommendation(s):

3.1 The Council has already adopted CIPFA's Treasury Management in Public Services Code of Practice and Cross-Sectoral Guidance Notes (2021 Edition). A feature of the Code is that periodic reports on Treasury Management activities are submitted to the Executive and the attached report relates to Treasury Management activities for the six months to 30 September 2023.

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

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

### 4.0 Other alternative options to be considered:

4.1 None.

## **5.0 Council priority:**

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

## **6.0 Background information**

6.1 The Council has adopted CIPFA’s Treasury Management in Public Services Code of Practice and Cross-Sectoral Guidance Notes (2021 Edition). A feature of the Code is that periodic reports on treasury management activities are prepared. This report relates to treasury management activities for the six months to 30th September 2023 and its content is reflective of the scale of the Council’s current capital programme.

## **6.2 Borrowing Transactions**

### **Overview**

6.3 The Bank of England Official Bank Rate (ie the ‘base rate’ short-term interest rate to which all interest are related stood at 4.25% on 1 April 2023 (0.75% on 1 April 2020 and has risen three subsequent times to 5.25% as at 30 September 2023).

Appendix 3a shows movements in the base rate from September 2018 to September 2023 in order to display the recent trend.

Appendix 3b shows movements in the borrowing rates available since April 2018 for Public Works Loan Board (PWLB) long-term (20-25 year rates), Public Works Loans Board one year and variable one month rates.

Covid, the war in Ukraine, as well as global supply shortages have had a significant impact on the global and UK economy over the past 18 months, which has resulted in the Bank of England increasing the base rate from 0.75% to 5.25% which is its highest level since 2008

## **6.4 Loans Raised**

The Treasury Management Panel decided to reduce the Council’s exposure to interest rate risk by fixing £125m of the temporary borrowing portfolio in August 2022.

Temporary borrowing has been required to deal with the normal peaks and troughs of the cash flow, including creditor payments, grant receipts, etc. It has also been used to finance any shortfalls in cash flow caused by capital expenditure. The temporary financing of capital expenditure is prudent while short-term interest rates remained comparatively low compared to long term borrowing and had the advantage of minimising temporary investments and the associated counterparty risk.



## 6.5 Loans Repaid

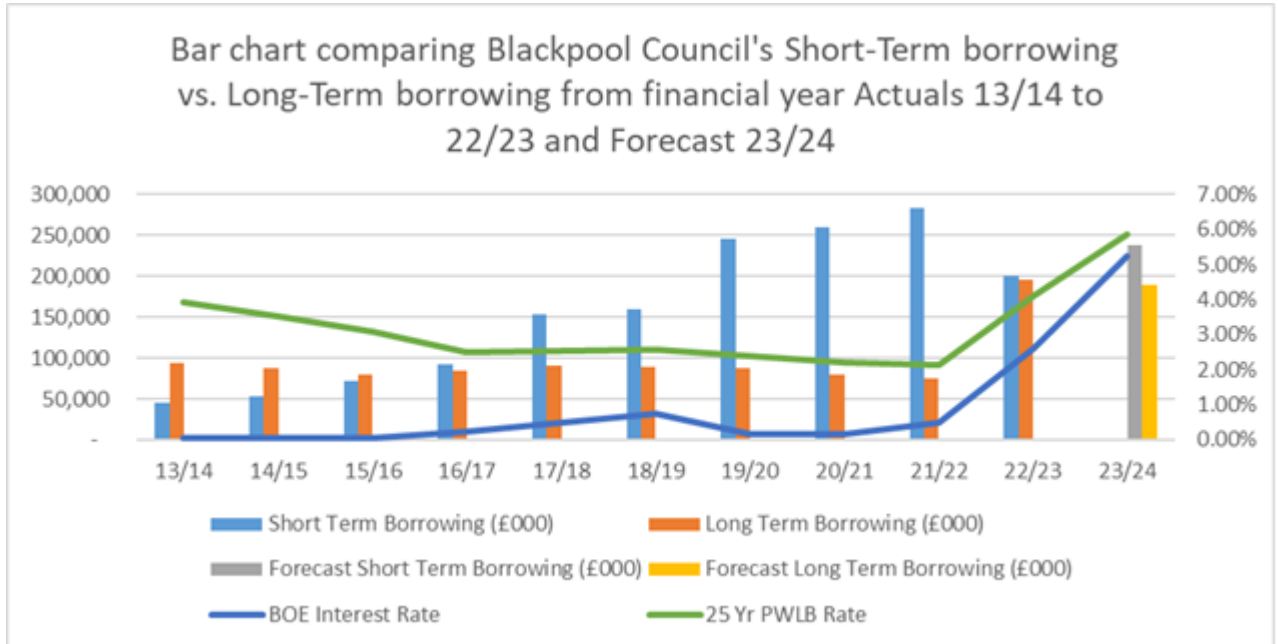
Loans repaid include the repayment of an Equal Instalments of Principal (EIP), Public Works Loans Board loan totalling £461,500, £10m of Market Loans due to an increase in the proposed rates from an average rate of 4.225% to 6.225% and the temporary borrowing referred to in 6.4 above. Three further longer term loan repayments are anticipated during the next 6 months including the second £461,500 payment of the Equal Instalments of Principal loan and 3 further Public Works Loans Board loans with the following values: £1,776,000, £1,184,000 and £592,000.

## 6.6 Summary

**The Council's borrowing activities for the first half of the financial year are summarised below:**

Source of funding:	Borrowings 1 <sup>st</sup> April '23 £000s	Loans raised £000s	Loans repaid £000s	Borrowings 30 <sup>th</sup> Sep '23 £000s	% of overall Borrowing
PWLB	174,286	-	(462)	173,824	
Market Loans	26,000	-	(10,000)	16,000	
<b>Sub-total</b>	<b>200,286</b>	<b>-</b>	<b>(10,462)</b>	<b>189,824</b>	<b>48%</b>
Temporary Loans	196,000	165,350	(152,700)	208,650	<b>52%</b>
<b>Total borrowings (excluding PFI Schemes and finance leases)</b>	<b>396,286</b>	<b>165,350</b>	<b>(163,162)</b>	<b>398,474</b>	

6.7 Appendix 3c to this report shows the maturity profile for the £200m of long-term external loans (ie. the Public Works Loan Board and market debt only from the above table) outstanding at the end of September 2023. The maturity profile is in line with the Council’s approved strategy.



6.8 **TRANSACTIONS FOR THE FIRST HALF OF 2023/24**

6.9 **Level of Investments**

Appendix 3d to this report sets out an analysis of the Council’s receipts and payments during the first half of the financial year. The Council’s temporary investments stood at £20.2m on 30 September 2023. This compares with temporary investments valued at £80.8m on 30th September 2022. Temporary surplus funds are invested in accordance with the Treasury Management Strategy’s requirements regarding security, liquidity and yield.

6.10 **Investment Earnings**

The Council takes advantage of peaks and troughs in receipts and payments by investing surplus funds over appropriate timescales within the context of the Council’s overall cash flows. The actual investment interest earned to 30 September was £394,000. Appendix 3e shows a monthly analysis of interest receipts compared to budget.

## 6.11 Approved Investment Institutions

In order to manage prudently any surplus funds as set out within the Treasury Management Strategy the Council restricts its temporary investments to an authorised list of institutions. According to the creditworthiness of each institution, an appropriate investment ceiling has been set with each as well as a maximum investment period. The credit ratings are monitored on a regular basis and checks are made via the internet and other media sources for signs of banks and building societies in difficulty. Council officers continue to use their contacts in the money market and speak regularly with other members of the Manchester Treasury Group to obtain market intelligence.

Blackpool's Treasury Management Panel includes the Director of Resources, Head of Accountancy and representatives from Corporate Finance and Blackpool Coastal Housing who meet regularly throughout the year to review the list of approved investment institutions.

For banks the approved list is based on credit ratings issued by Fitch (single A categories or above, or the equivalent from other ratings agencies). The list also includes the more stable building societies, banded according to total asset size.

The proportion of temporary investments placed in the period 1 April 2023 to 30 September 2023 across the various categories of approved institutions is set out in the table below:

Type of institution invested with:	Amount £000s	% of total	Average Investment Rate
UK banks and UK subsidiaries of overseas banks	20,150	100	4.517%
Other Local Authorities	0	0	
Debt Management Office - deposit facility	0	0	
<b>Total temporary investments placed</b>	<b>20,150</b>	<b>100.0</b>	

Appendix 3d to this Report shows how the investing and maturing of temporary investments fits in with the rest of the Council's bank transactions.

## 6.12 Group Companies and Partners

During the past six months the council has continued to provide advice and financial assistance to some of its subsidiary companies and partners. The Council has a number of loan agreements with a number of companies and cash is transferred on receipt of validated loan drawdown applications. The Council also continues to provide loans to third parties via its Business Loans Fund Panel.

## 6.13 TREASURY MANAGEMENT BUDGET MONITORING 2023/24

The month 6 financial performance monitoring report shows a favourable forecast outturn for Treasury Management in 2023/24 of £1,585k. The main components of this favourable position are as follows

	£'000s
Interest on Business Loans Fund lending	(73)
Financing costs on debt and capital scheme slippage	(1,099)
Temporary interest on short term investments	(413)
<b>Net (favourable)/adverse outturn forecast</b>	<b>(1,585)</b>

## 6.14 PRUDENTIAL CODE FOR CAPITAL FINANCE

Where capital expenditure has been incurred which is financed by debt assumed under the Prudential Code For Capital Finance In Local Authorities, budget has been vired from the service area incurring the spend. This budget is used to pay for the additional capital financing costs which are incurred within Treasury Management as a consequence of the capital spend. In the case of Leisure Assets an actual charge for financing costs has been made to the scheme. The cost to the Council of employing its capital in these schemes arises from both the interest cost of the investment and from the subsequent need to repay the principal.

Cost savings or revenue increases within the services as a result of the capital investment will have been previously identified within a business case in order to demonstrate that these schemes are self-funding or better.

## 6.15 Prudential Indicators

At its meeting of 22 February 2023 the Council adopted the framework set out within CIPFA's Prudential Code For Capital Finance In Local Authorities (2021 edition).

The Code requires that monitoring of performance against the performance indicators (the Prudential Indicators) is reported to the appropriate decision-making body.

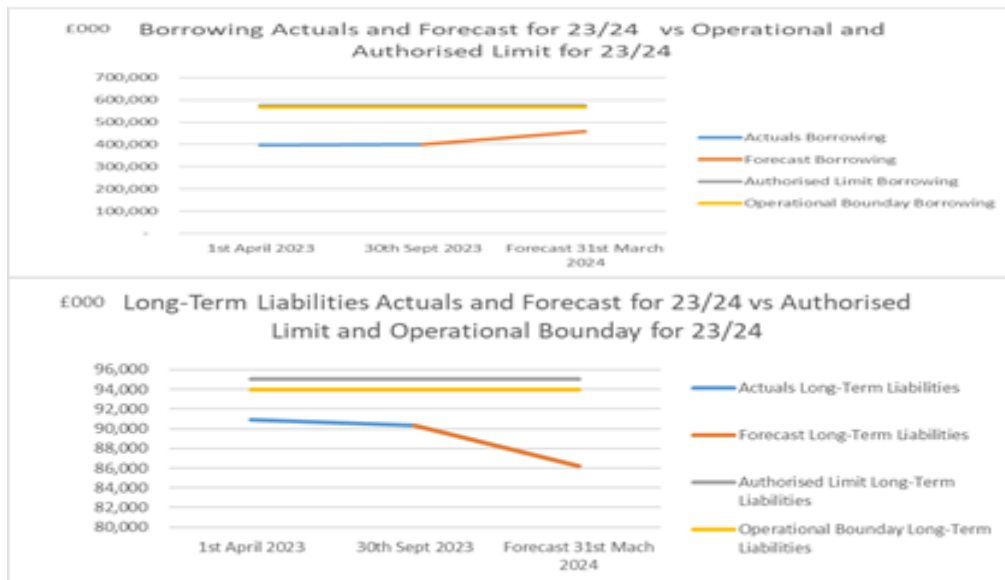
Appendix 3f to this report shows the Prudential Indicators from 1 April 2023 to 30 September 2023, separately identifying the affordability indicators, the indicators of prudence and the treasury management indicators.

The format of these indicators is set out in the CIPFA Code of Practice.

Performance in the first half of 2023/24 is in line with expectations.

**6.16 Capital Schemes Funded by Prudential Borrowing**

Appendix 3g to this report shows the headroom to the authorised (borrowing) limit and operational boundary, and identifies the expenditure on schemes which are prudentially funded by year.



6.17 Does the information submitted include any exempt information?

No

**7.0 List of Appendices:**

- 7.1 Appendix 3a – Bank of England Official Base Rate September 2018 to September 2023
- Appendix 3b – Borrowing Rates April 2018 to September 2023
- Appendix 3c – External Debt Fallout Chart as at 30th September 2023
- Appendix 3d – Summary Statistics for April to September 2023
- Appendix 3e – Interest Earned on Temporary Investments 2023/24
- Appendix 3f – Prudential Indicators 2023/24
- Appendix 3g- Authorised Limit and Operational Boundary, Prudentially funded schemes 2023/24

**8.0 Financial considerations:**

- 8.1 As outlined in the report and Appendices.

**9.0 Legal considerations:**

- 9.1 None.

**10.0 Risk management considerations:**

- 10.1 Interest rate movements and planned debt fallouts and amounts and the nature of borrowing to fund capital expenditure.

**11.0 Equalities considerations and the impact of this decision for our children and young people:**

- 11.1 None.

**12.0 Sustainability, climate change and environmental considerations:**

- 12.1 None.

**13.0 Internal/external consultation undertaken:**

- 13.1 None.

**14.0 Background papers:**

- 14.1 None.

**15.0 Key decision information:**

- 15.1 Is this a key decision? No
- 15.2 If so, Forward Plan reference number:
- 15.3 If a key decision, is the decision required in less than five days? No
- 15.4 If **yes**, please describe the reason for urgency:

**16.0 Call-in information:**

- 16.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No
- 16.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**17.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: \_\_\_\_\_ Date approved: \_\_\_\_\_

**18.0 Declarations of interest (if applicable):**

18.1

**19.0 Summary of Discussion:**

19.1

**20.0 Executive decision:**

20.1

**21.0 Date of Decision:**

21.1

**22.0 Reason(s) for decision:**

22.1

**23.0 Date Decision published:**

23.1

**24.0 Alternative Options Considered and Rejected:**

24.1

**25.0 Executive Members in attendance:**

25.1

**26.0 Call-in:**

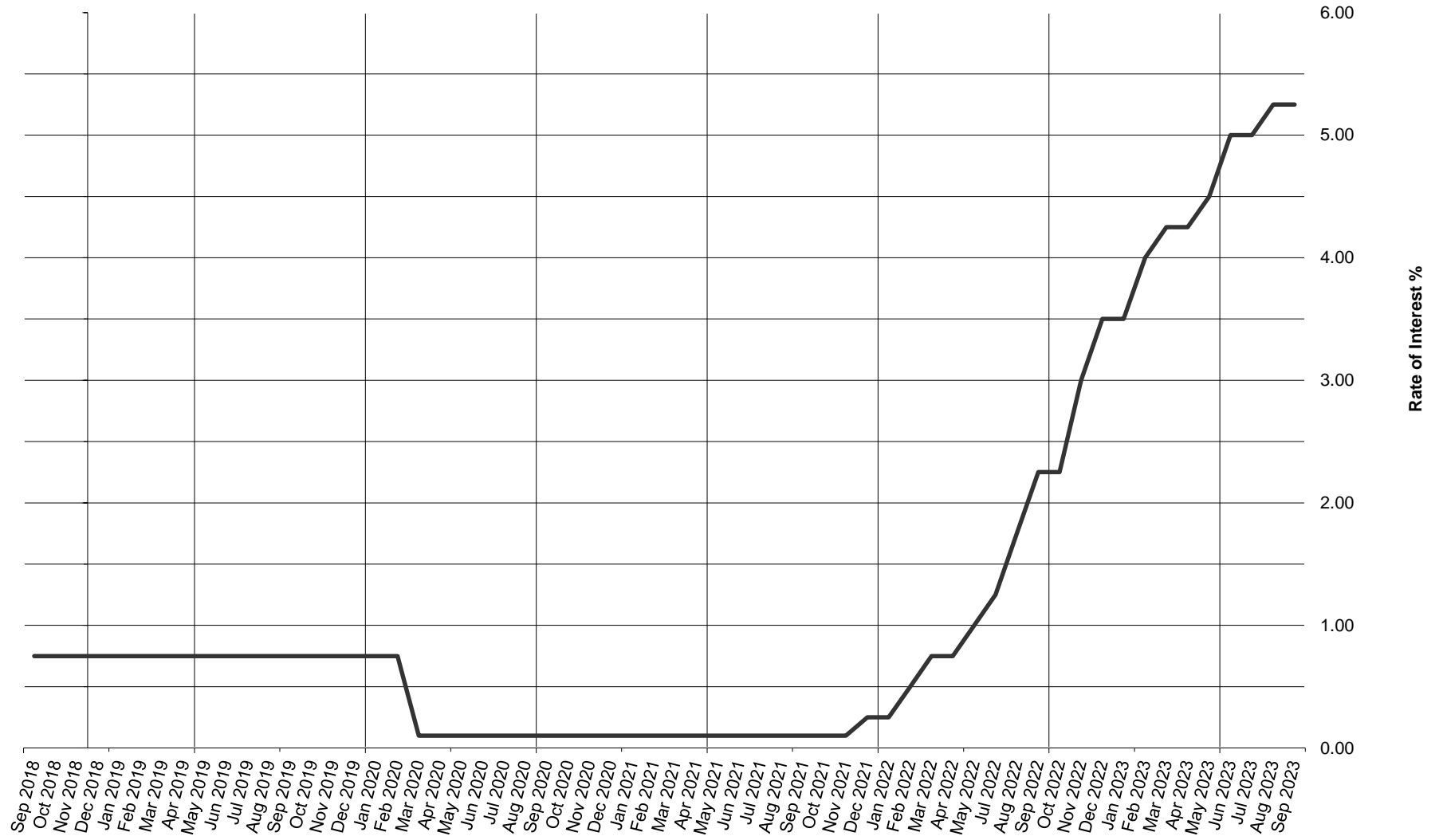
26.1

**27.0 Notes:**

27.1



### Bank of England Official Base Rates Sept 2018 - Sept 2023

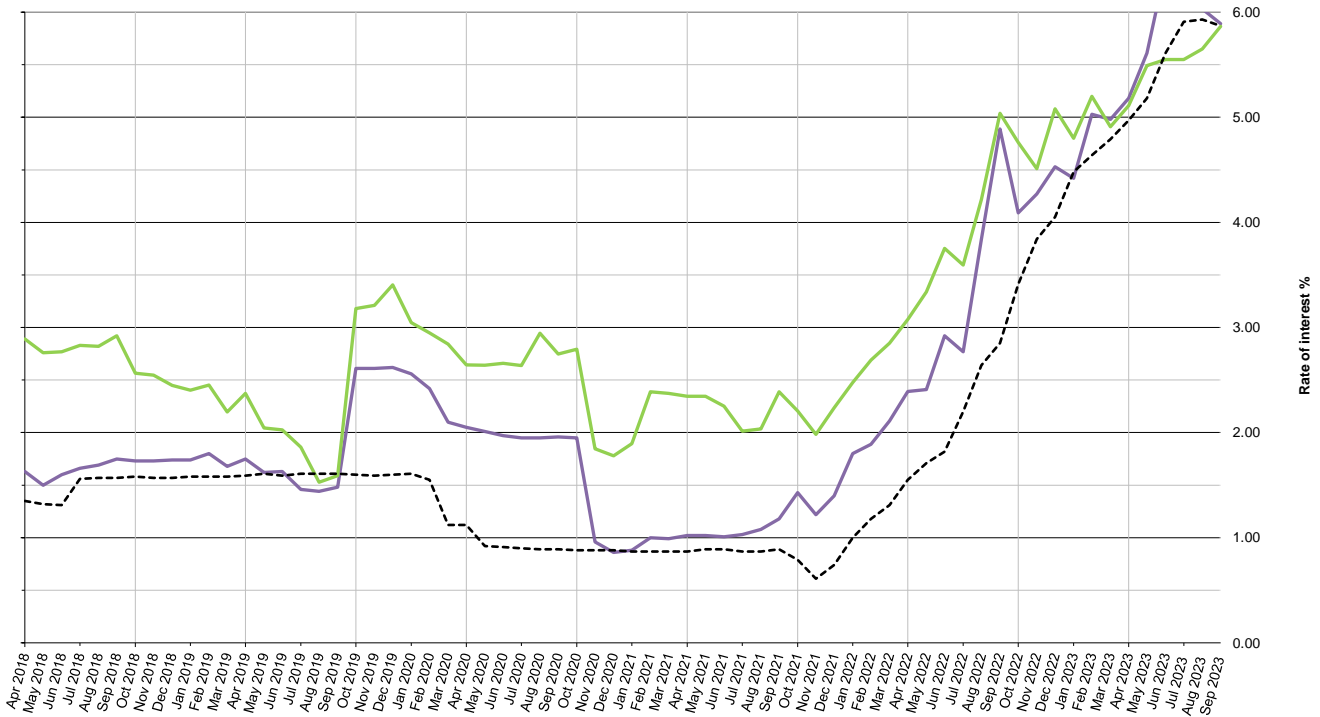


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Appendix 3b

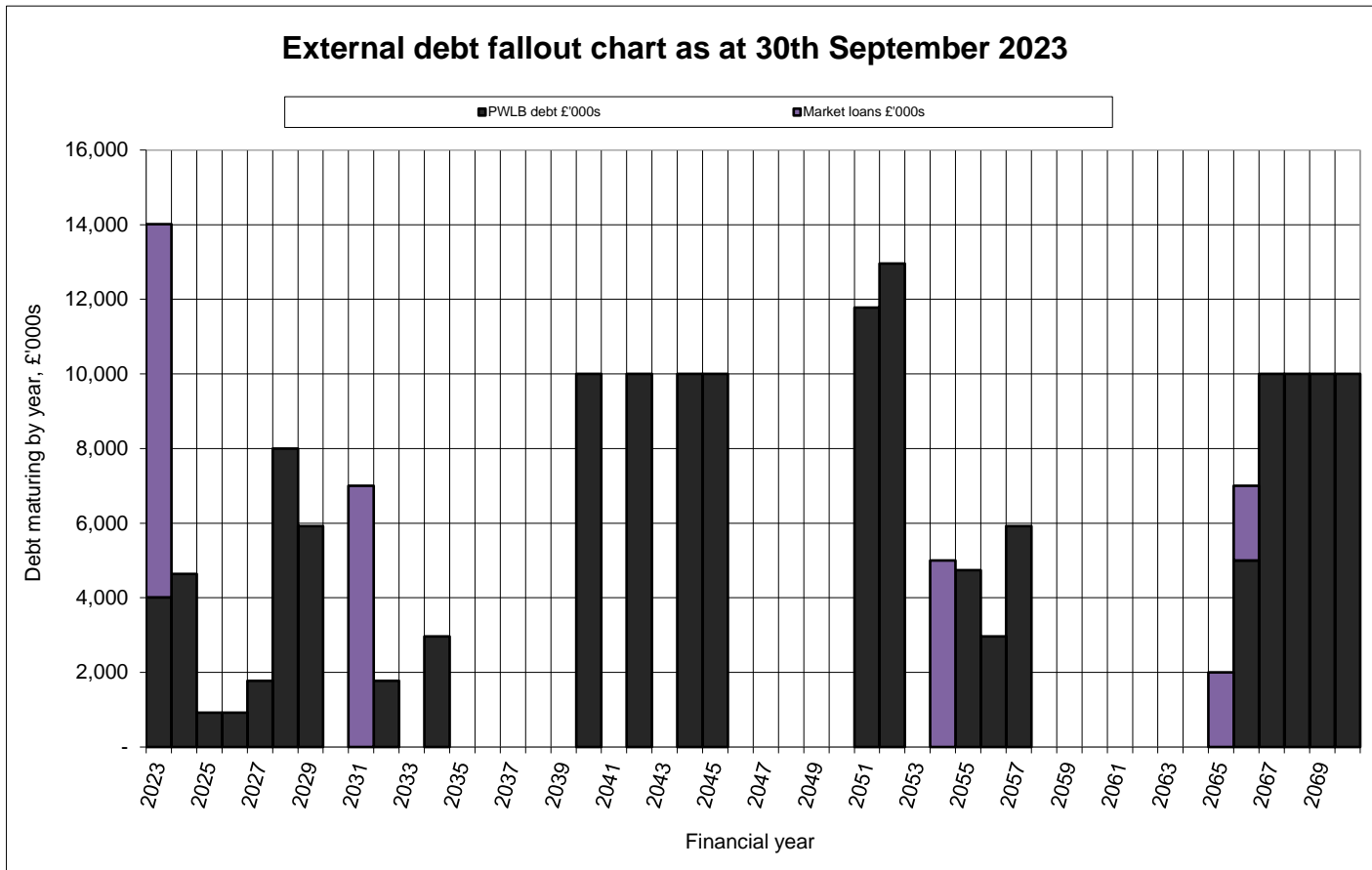
Borrowing rates available Apr 2018 - Sep 2023

— PWLB 1 Year Borrowing Rate    
 — PWLB Long Term (20-25 years) Borrowing Rate    
 - - - - Short Term (1 mnth) Variable Borrowing Rate



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Appendix 3c



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## Summary Statistics for April to September 2023

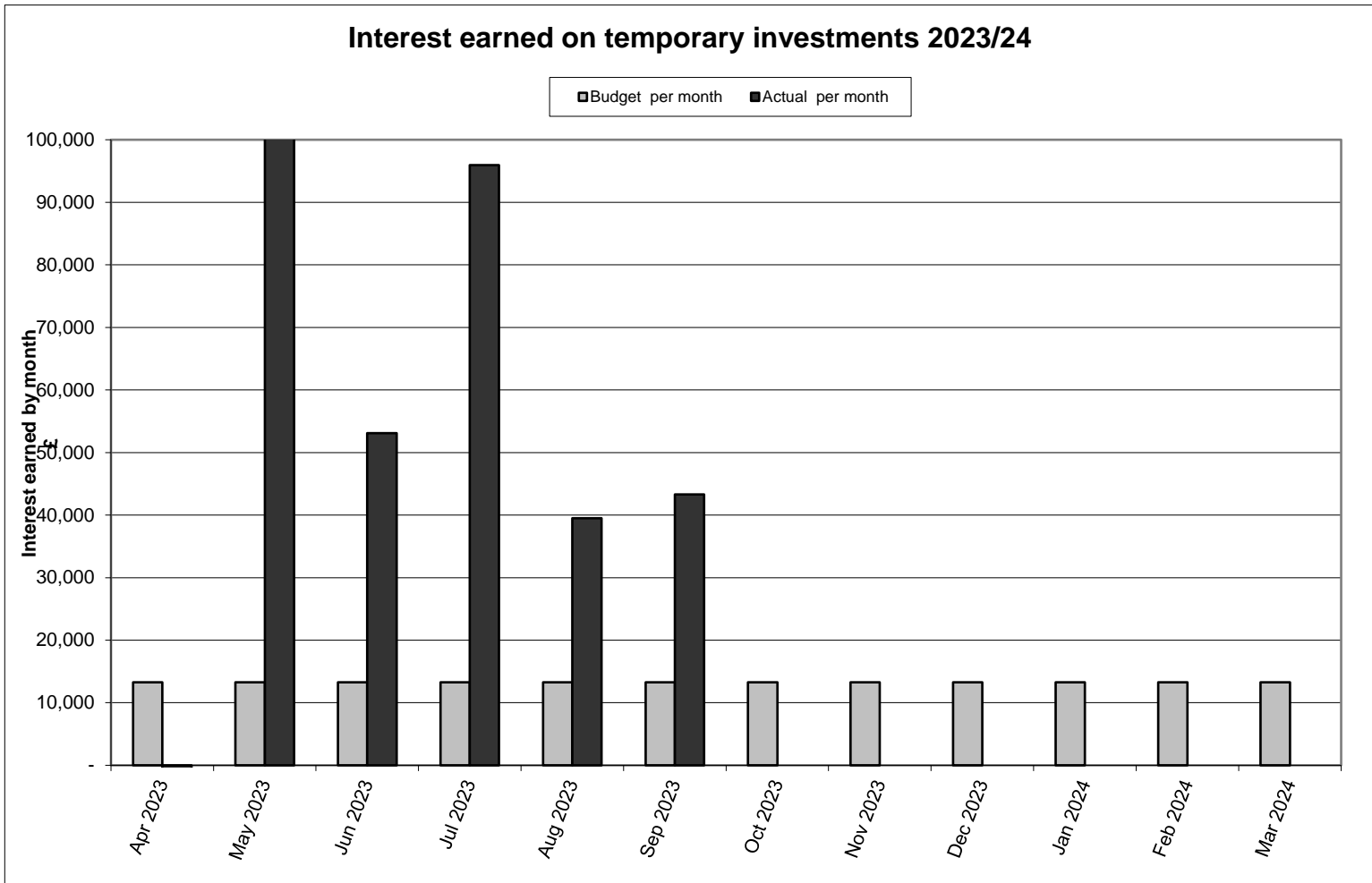
<b>OVERALL DEBT FINANCING POSITION</b>			
<b>B/Fwd</b>		<b>Change YTD</b>	<b>C/Fwd</b>
<b>1st April</b>			<b>30th Sept</b>
<b>£'000</b>		<b>£'000</b>	<b>£'000</b>
-	Investments	-	-
15,050	Bank Deposits	5,100	20,150
<b>15,050</b>	<b>Total Investments</b>	<b>5,100</b>	<b>20,150</b>
196,000	Short term loans	12,650	208,650
200,246	Long term loans	(10,422)	189,825
<b>396,246</b>	<b>Total Loans</b>	<b>2,229</b>	<b>398,475</b>
<b>381,196</b>	<b>Total Loans less total investments</b>		<b>378,325</b>

<b>TRANSACTIONS IN THE SIX MONTHS</b>		<b>£'000</b>
		<b>YTD</b>
<b>RECEIPTS</b>		
Loans borrowed	(*)	165,350
Investments matured	(*)	215,584
Housing Benefit		22,043
Council tax and NNDR		50,732
VAT		10,939
RSG/BRR incl DSG		57,814
Other Grants		102,527
Other Income		78,790
<b>TOTAL</b>		<b>703,779</b>
<b>PAYMENTS</b>		
Police & Fire		6,615
General Creditors		233,677
Salaries & wages		63,190
Loan repayments	(*)	162,700
Investments made	(*)	220,684
Housing Benefits		16,958
<b>TOTAL</b>		<b>703,824</b>
		<b>£'000</b>
<b>Opening bank balances</b>		<b>93</b>
<b>Receipts as analysed above</b>		<b>703,779</b>
<b>Payments as analysed above</b>		<b>703,824</b>
<b>Closing bank balances: 30.9.23</b>		<b>48</b>

(\*) These values show the totals of all movements on temporary investments and loans during the six months. Due to the recycling nature of investing and lending, these values are NOT the absolute value of our portfolio of temporary balances as at 30th September 2022.

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**Blackpool Council**  
**Prudential Code for Capital Finance**  
**Prudential Indicators 2023/24**

<u>Prudential Indicator</u>		<u>23/24 Full year planned PI</u>	<u>23/24 First half year actual PI</u>	
<b>Appendix 3c re1 Prudential Indicators: the actual position 2023/24</b>				
2.4	Actual Capital Expenditure, non-HRA. 23/24	To be reported after the 31.3.24 year end.	<i>This Prudential Indicator is fully disclosed within the capital reporting.</i>	
2.4	Actual Capital Expenditure, HRA. 23/24	To be reported after the 31.3.24 year end.	<i>This Prudential Indicator is fully disclosed within the capital reporting.</i>	
5.2	Actual Capital Financing Requirement as at 31/03/24	<b>£671M.</b> (including PFI schemes)	<i>This Indicator is for the full year only and will be reported after the 31.3.24 year end.</i>	
5.2	Actual External net borrowing as at 31/03/24	<b>£566M</b> (including PFI schemes)	<i>This Indicator is for the year end only and will be reported after the 31.3.24 year end.</i>	

<u>Prudential Indicators for Affordability</u>				
6.2	The ratio of financing costs to net revenue stream, non-HRA. 23/24	<b>13.6%</b>	<b>9.1%.</b> Based on forecasted borrowing costs and revenue streams.	9.1%
6.2	The ratio of financing costs to net revenue stream, HRA. 23/24	<b>7.2%</b>	<b>4.3%.</b> Based on forecasted borrowing costs and revenue streams.	4.3%
Capital	Estimates of the incremental impact of capital investment decisions on the Council Tax, non-HRA. 23/24	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>	
Capital	Estimates of the incremental impact of capital investment decisions on housing rents, HRA. 23/24	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>	

<u>References</u>	<u>Prudential Indicator</u>	<u>23/24 Full year planned PI</u>	<u>23/24 First half year actual PI</u>	
<b>Prudential Indicators for Prudence</b>				
Capital	Capital Expenditure (including capital commitments), non-HRA. 23/24	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>	
Capital	Capital Expenditure (including capital commitments), HRA. 23/24	This Prudential Indicator is disclosed within the capital reporting.	<i>This Prudential Indicator is disclosed within the capital reporting.</i>	
5.7	Authorised Limit. 23/24	(*) Borrowing no higher than <b>£576.0M</b> (*) Long Term Liabilities no higher than <b>£95.0M</b>	<b>Current y/e forecast is £427.98M</b> <b>Current y/e forecast is £91.03M</b>	LTL 189.3254335 91.03
5.7	Operational Boundary. 23/24	(*) Borrowing no higher than <b>£567.0M</b> (*) Long Term Liabilities no higher than <b>£94.0M</b>	<b>Current y/e forecast is £427.98M</b> <b>Current y/e forecast is £91.03M</b>	189.3254335 91.03
3.4	Net borrowing and the Capital Financing Requirement.	<b>Borrowing &lt; estimated CFR except in the short term.</b>	<i>This Indicator is being complied with.</i>	
3.3	Estimates of the Capital Financing Requirement, non-HRA. 31.3.24	<b>£633M.</b> Per Budget workings. Including PFI schemes.	<b>£621.9M</b>	621.90
3.3	Estimates of the Capital Financing Requirement, HRA. 31.3.24	<b>£38M.</b>	<b>£33.6M</b>	33.57

<u>Prudential Indicators for Treasury Management</u>																																		
1.3	Adoption of the CIPFA Code of Practice and Cross-Sectoral Guidance Notes on Treasury Management - 2017 Edition.	<b>Adoption.</b>	<b>Adopted.</b>																															
8.8 (Annex B)	Gross Debt less than the Capital Financing Requirement:	<b>Gross Debt: £566.3M, CFR: £671.3M</b>	<b>Current y/e forecast is: Gross Debt £519.01M, CFR 671.3</b>																															
8.8 (Annex B)	Variable interest rate exposure. Upper limit. 23/24	<b>£402M</b>	<b>£238M</b>																															
8.8 (Annex B)	Fixed interest rate exposure. 23/24	<b>£670M</b>	<b>£281M</b>																															
8.8 (Annex B)	Prudential limits for the maturity structure of fixed interest rate borrowing.	<table border="1"> <thead> <tr> <th></th> <th>Lower limit</th> <th>Upper limit</th> </tr> </thead> <tbody> <tr> <td>&lt; 12 months</td> <td>Nil%</td> <td>18%</td> </tr> <tr> <td>12 to within 24 mths</td> <td>Nil%</td> <td>18%</td> </tr> <tr> <td>24 mths, within 5 yrs</td> <td>Nil%</td> <td>30%</td> </tr> <tr> <td>5 to within 10 years</td> <td>2.0%</td> <td>60%</td> </tr> <tr> <td>10 to within 30 years</td> <td>2.0%</td> <td>70%</td> </tr> <tr> <td>30 years and above</td> <td>15.0%</td> <td>90%</td> </tr> </tbody> </table>		Lower limit	Upper limit	< 12 months	Nil%	18%	12 to within 24 mths	Nil%	18%	24 mths, within 5 yrs	Nil%	30%	5 to within 10 years	2.0%	60%	10 to within 30 years	2.0%	70%	30 years and above	15.0%	90%	<table border="1"> <thead> <tr> <th></th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td rowspan="6"><i>This indicator is being complied with.</i></td> <td>7%</td> </tr> <tr> <td>3%</td> </tr> <tr> <td>5%</td> </tr> <tr> <td>7%</td> </tr> <tr> <td>34%</td> </tr> <tr> <td>44%</td> </tr> </tbody> </table>		Actual	<i>This indicator is being complied with.</i>	7%	3%	5%	7%	34%	44%	14,013.00 5,563.00 10,699.00 14,696.00 67,696.00 87,619.00 200,286.00
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8.7 (Annex B)	Prudential limits for principal sums invested for periods longer than 364 days.	Not permitted; see Treasury Management Investment Strategy.	<i>This Indicator is being complied with.</i>																															

\* The figure for Long Term Liabilities includes the SOA figures for PFI schemes.

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## Blackpool Council

## Authorised Limit and Operational Boundary Control, Prudentially funded schemes, 2023/24

	External Debt		Total External Debt
	Borrowing	Liability against finance leases & PFI schemes	
	£'000	£'000	£'000
<b>Total Debt @ 1st April 2023</b>	396,246	95,725	491,971
New Borrowing taken out YTD 23/24	165,390	-	165,390
less: Borrowing repaid YTD 23/24	(162,700)	(599)	(163,299)
<b>All debt outstanding as at 30th September 2023</b>	<b>398,936</b>	<b>95,126</b>	<b>494,062</b>
New borrowing expected before year end	61,250	-	61,250
less: Borrowing expected to be repaid before year end	(760)	(4,093)	(4,853)
<b>Therefore (debt) forecast @ 31st March 2024</b>	<b>459,426</b>	<b>91,033</b>	<b>550,459</b>
Authorised limit, 23/24	576,000	95,000	671,000
<b>Therefore, headroom to Authorised limit 23/24</b>	<b>116,574</b>	<b>3,967</b>	<b>120,541</b>
Operational boundary, 23/24	567,000	94,000	661,000
<b>Therefore, headroom to Operational boundary 23/24</b>	<b>107,574</b>	<b>2,967</b>	<b>110,541</b>

Annual Capital Expenditure funded by prudential borrowing

	Year	Total Value of Prudential Schemes	Source of funding (Prudential borrowing or finance leasing)
		£'000	
Prudential Schemes	2004/05	5,933	Borrowing
Prudential Schemes	2005/06	6,272	Borrowing
Prudential Schemes	2006/07	717	Borrowing
Prudential Schemes	2007/08	1,334	Borrowing
Prudential Schemes	2008/09	703	Borrowing
Prudential Schemes	2009/10	16,726	Borrowing
Prudential Schemes	2010/11	3,080	Borrowing
Prudential Schemes	2011/12	39,723	Borrowing
Prudential Schemes	2012/13	11,884	Borrowing
Prudential Schemes	2013/14	41,323	Borrowing
Prudential Schemes	2014/15	6,112	Borrowing
Prudential Schemes	2015/16	1,867	Borrowing
Prudential Schemes	2016/17	15,153	Borrowing
Prudential Schemes	2017/18	6,300	Borrowing
Prudential Schemes	2018/19	5,531	Borrowing
Prudential Schemes	2019/20	27,005	Borrowing
Prudential Schemes	2020/21	1,230	Borrowing
Prudential Schemes	2021/22	6,250	Borrowing
Prudential Schemes	2022/23	40,975	Borrowing
Prudential Schemes	2023/24	13,101	Borrowing
<b>Cumulative prudentially funded expenditure</b>		<b>251,219</b>	

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<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Alan Cavill, Director of Communications and Regeneration
<b>Relevant Cabinet Member:</b>	Councillor Lynn Williams, Leader of the Council
<b>Date of Meeting:</b>	6 November 2023

## **MARTON MOSS NEIGHBOURHOOD DEVELOPMENT PLAN - Adoption (Making) of the Neighbourhood Plan**

### **1.0 Purpose of the report:**

1.1 The purpose of this report is to:

- a) appraise members of the of the outcome of the Referendum on the Marton Moss Neighbourhood Plan.
- b) seek Executive to recommend to Council to adopt the Marton Moss Neighbourhood Plan.
- c) to inform members of the next stages.

### **2.0 Recommendation(s):**

2.1 To recommend to Full Council:

- (i) to formally “make” the Marton Moss Neighbourhood Development Plan with immediate effect, with the consequence that it becomes part of the statutory Development Plan for the designated area.
- (ii) to authorise the Director of Communications and Regeneration to undertake the necessary steps for the adoption process to be completed and that delegated powers be given to the Head of Planning Strategy to make any final modifications to improve readability; correct any factual matters or typographical errors; and the final presentation of the document.

### 3.0 Reasons for recommendation(s):

- 3.1 The National Planning Policy Framework (NPPF) and the Localism Act 2011 give local communities direct power to develop their shared vision for their neighbourhood and deliver the sustainable development they need. Neighbourhood planning provides a set of tools for local people to get the right type of development for their community.
- 3.2 The Council formally designated the Marton Moss Neighbourhood Area and Neighbourhood Forum on 26th March 2019 in accordance with the Neighbourhood Plan (General) Regulations (as amended) 2012 - Regulations 7 and 10. This established the process for the Marton Moss Neighbourhood Forum (MMNF) as the qualifying body to produce a neighbourhood plan for the designated area.
- 3.2 The Forum submitted their draft plan, which covers the period 2020 to 2030, to the Council (Regulation 15) in August 2022. The Council published the draft plan for consultation in accordance with Regulation 16 in October 2022.
- 3.3 The Council appointed an independent examiner in February 2023, in agreement with the Marton Moss Neighbourhood Forum, in accordance with Regulation 17 and the examiner published his report (refer Appendix 4b), which the Council received on 29th March 2023.
- 3.4 The Council published their decision in accordance with Regulation 17a and accepted the examiner's recommendations and proposed modifications to allow the Referendum Plan (refer Appendix 4a) to progress towards becoming a 'made' plan and part of Blackpool's development plan, subject to a 'yes' vote in a referendum.
- 3.5 The referendum was held on 5th October 2023 in accordance with the Neighbourhood Planning (Referendums) Regulations 2012 (as amended in 2013). There was a turnout of 32.19%. Of the votes received 246 (90.44%) voted 'yes' in response to the referendum question, "Do you want Blackpool Council to use the Neighbourhood Plan for Marton Moss to help it decide planning applications in the neighbourhood area?" ([Marton Moss neighbourhood planning referendum results \(blackpool.gov.uk\)](https://www.blackpool.gov.uk/marton-moss-neighbourhood-planning-referendum-results))
- 3.6 The majority "yes" votes mean the Council is now required to formally 'make' (adopt) the Plan.
- 3.7 Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No
- 3.8 Is the recommendation in accordance with the Council's approved budget? Yes



#### **4.0 Other alternative options to be considered:**

4.1 None as the Marton Moss Neighbourhood Plan has been produced in line with the relevant planning regulations and as outlined in paragraph 3.5 supported by a majority of voters in the referendum on 5 October 2023.

#### **5.0 Council priority:**

5.1 The relevant Council priorities are both:

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

#### **6.0 Background information**

6.1 The Blackpool Local Plan Part 1: Core Strategy (Adopted January 2016) at Policy CS26 promotes a neighbourhood planning approach for Marton Moss, to develop neighbourhood planning policy, which supports the retention and enhancement of the distinctive character of the Moss, whilst identifying what circumstances development may be acceptable. Policy CS26 also defines the boundary for the neighbourhood area.

6.2 In November 2017, the local community voted in favour of producing their own neighbourhood plan for Marton Moss and the Executive endorsed this approach at their meeting on the 19th February 2018. The Council subsequently formally designated the Marton Moss Neighbourhood Area on 26th March 2019, as well as the Marton Moss Neighbourhood Forum, in accordance with Regulations 7 and 10 respectively of the Neighbourhood Plan Regulations.

6.3 Over the past 4 years, the Marton Moss Neighbourhood Forum has been developing a draft Neighbourhood Plan covering the period 2020 to 2030. To assist in the drafting of the Plan, the Forum appointed Envision Consultants. In addition, other consultants were engaged to build evidence to support the policies and proposals in the Plan.

6.4 The Plan (Refer Appendix 4a) sets out policies in relation to the development and use of land in the designated Marton Moss Neighbourhood Area in accordance with S.38A of the 2004 Act

6.5 The Plan includes policies and proposals which cover:

- **Design and the Local Environment** - requiring new buildings to be well designed, be in character with the local area and improving biodiversity; safeguarding areas of major open land from being inappropriately developed and securing environmental improvements; and to specifically improve the roadside appearance and retain the open character of the land at School Road/Midgeland Road Junction.
- **Housing Development** – allocating a limited number of housing sites and guiding the number, sizes, and types of new homes on each site; allowing windfall housing on unallocated sites provided they meet the policy’s strict criteria;
- **Horticultural and Equestrian Uses** - supporting where possible horticultural businesses providing guidance regarding future alternative uses; and horse stabling and riding activities supporting equestrian development subject to certain criteria being met.
- **Heritage and Community** – a specific policy relating to Midgeland Farm to enable restoration and community use.

6.6 Community engagement has been at the centre the plan, with involvement of the public and various stakeholders at many stages of the process, which is acknowledged by the Examiner. The consultation statement submitted with the draft plan at the Regulation 16 stage provides detail of the consultation and engagement that has been undertaken by the MMNF ([blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/S03-Consultation-Statement-Final.pdf](https://blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/S03-Consultation-Statement-Final.pdf)).

6.7 In March and April 2022 public consultation was undertaken in accordance with Regulation 14 of the Neighbourhood Planning Regulations allowing residents and stakeholders, including the Council, to comment on the policies and site allocations proposed within the draft plan

6.8 Following this consultation, the Marton Moss Neighbourhood Forum made some changes in response to the representations received and submitted in August 2022 the Submission Draft Plan to the Council in accordance with Regulation 15 of the Neighbourhood Plan (General) Regulations. The Council publicised the draft plan and supporting documents for consultation for a 6 week period, in accordance with Regulation 16.

- 6.9 Following the Regulation 16 consultation, the Council appointed an independent examiner in February 2023, in agreement with the Marton Moss Neighbourhood Forum, to enable the plan to move to examination, in accordance with Regulation 17. Via Intelligent Plans and Examinations Ltd., examiner Andrew Mead was appointed to undertake the examination of the draft plan.
- 6.10 The role of the examiner is to scrutinise the plan and determine whether the plan meets basic conditions as required by the Localism Act. It is usual for the examiner to recommend modifications to a plan in order for it to meet the basic conditions before it can go forward to the referendum. The basic conditions comprise:
- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the plan
  - the making of the plan contributes to the achievement of sustainable development
  - the making of the plan is in general conformity with the strategic policies contained in the development plan of the authority (or any part of that area)
  - the making of the plan does not breach, and is otherwise compatible with, EU obligations
  - prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposals for the order
- 6.11 The examination into the neighbourhood plan took place via written representations without the need for hearing sessions. Having considered all the information before him the Examiner made some additional requests to both the Council and the Marton Moss Neighbourhood Forum, which he set out in his procedural matters letter. The Examiner also carried out an unaccompanied site visit to the area.
- 6.12 The Examiner's report (Appendix 4b refers) was received on 29 March 2023 and concluded that with the proposed modifications, the policies within the Marton Moss Neighbourhood Plan are in general conformity with the strategic policies of the Blackpool Local Plan Part 1; have regard to national guidance; would contribute to the achievement of sustainable development; and would meet the Basic Conditions and legal requirements. In summary, the Examiner recommended that the Plan, once modified, should proceed to referendum.

- 6.13 With respect to referendum, the Examiner considered that the referendum area should not be extended beyond that which the Plan relates. The Examiner came to this conclusion that the Plan, as modified, has no policy or proposal significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary.
- 6.14 The Examiner recommended seven proposed modifications to the plan, which are set out in the appendix of the Examiner’s report at pages 17 and 18. These modifications relate to the following policies:
- MM1, relating to building design, to ensure the policy takes in to account Planning Policy Guidance on drainage;
  - MM2 relating to open space character and removing the reference in the policy to, ‘significant open land elsewhere’;
  - MM4 adjusting the wording on 4 of the 21 housing site allocations to state an upper limit for the number of dwellings that can be developed on these sites;
  - MM6 which relates to market gardening businesses, amended wording to protect amenity of neighbouring occupiers and conformity with Core Strategy and Local Plan Part 2 policy;
  - MM8 amended wording in relation to the restoration and community role of Midgeland Farm; and finally
  - MM9 to ensure the designated Local Green Space took account of the requirements of the National Planning Policy Framework. In addition, the Examiner recommended that the front cover of the Plan should state the period covered by the Plan, which is 2020 to 2030.
- 6.15 Officers reviewed the Plan in light of the proposed modifications and concluded that the Examiner’s modifications are necessary for the Plan to meet the Basic Conditions. The Marton Moss Neighbourhood Forum also considered the proposed modifications, and following a meeting with the Council on 21st April 2023 agreed that the modifications are acceptable. Consequently the Marton Moss Neighbourhood Forum modified the Plan accordingly, confirmed that they wished the Plan to proceed to referendum.

6.16 The referendum was held, in accordance with legislation, on 5th October 2023. The question used in the referendum is set by the ‘Neighbourhood Planning (Referendums) Regulations 2012’, and was:

“Do you want Blackpool Council to use the neighbourhood plan for Marton Moss to help it decide planning applications in the neighbourhood area?”

6.17 There was a turnout of 32.19%. Of the votes received 246 (90.44%) voted ‘yes’ in response to the referendum question ([Marton Moss neighbourhood planning referendum results \(blackpool.gov.uk\)](https://www.blackpool.gov.uk)). The majority “yes’ votes mean the Council is now required to formally ‘make’ (adopt) the Plan

#### 6.18 **Next Stages**

As required by legislation, once the Marton Moss Neighbourhood Plan is adopted and Regulation 19 Decision Statement (refer Appendix 4c) is published, the respective documents need to be made available as soon as reasonably practical by publishing on the Council’s website and a printed copy needs to be made available for inspection. Also, the Council has to notify any person who asked to be notified of the making of the plan that it has been adopted and where and when it may be inspected.

6.19 Does the information submitted include any exempt information? No

#### 7.0 **List of Appendices:**

7.1 Appendix 4a – Marton Moss Neighbourhood Plan (and Policies Map) – Referendum Plan

Appendix 4b– Examiners Report on the Marton Moss Neighbourhood Plan

Appendix 4c – Draft Regulation 19 Decision Statement

#### 8.0 **Financial considerations:**

8.1 The work is being undertaken within existing budgetary provisions.

## **9.0 Legal considerations:**

9.1 In accordance with regulation 12 (4) Schedule 4B of the Town and Country Planning Act 1990 (as applicable by virtue of s38A (3) of the Planning and Compulsory Purchase Act 2004), the Council must hold a referendum if it is satisfied either:

a. The proposed Neighbourhood Plan meets the following conditions:

- (i) The basic conditions are met
- (ii) It is compatible with the ECHR
- (iii) It complies with the provision made by or under s38A (6) and s38B of the Planning and Compulsory Purchase Act 2004

Or

b. The proposed Neighbourhood Plan would meet the criteria if modifications were made (whether or not recommended by the examiner).

The modifications set out by the Examiner that were incorporated into the plan to ensure that the Neighbourhood Plan met the basic conditions and legal requirements and enabled the Plan proceed to referendum. The referendum took place on the 5 October 2023. The majority “yes” votes mean the Council is now required to formally ‘make’ (adopt) the Plan. The Marton Moss Neighbourhood Plan, when made, will become part of the Council’s statutory development plan

## **10.0 Risk management considerations:**

10.1 Once ‘made’ (adopted), the Marton Moss Neighbourhood Plan will form part of the Development Plan for Blackpool. Without its progression, this will compromise the implementation of adopted policy in the Core Strategy - Policy CS26 Marton Moss and undermine the neighbourhood planning process determined through the designation of the neighbourhood plan area and forum to provide a local policy framework to further direct development within the designated area, which reflects the priorities of the community. In addition, as the Neighbourhood Development Plan is considered to meet the Basic Conditions and legal requirements, the Council are required to adopt the plan due to the successful outcome at referendum.

**11.0 Equalities considerations and the impact of this decision for our children and young people:**

11.1 The Examiner confirmed that the Neighbourhood Plan meets the Basic Conditions subject to the recommended modifications which were incorporated into the Plan. One of the basic conditions is that the Plan must be compatible with human rights requirements. The Examiner is satisfied that the Plan will not have a discriminatory impact on any particular group of individuals. There are not considered to be any equality impacts relating to recommendations of this report.

**12.0 Sustainability, climate change and environmental considerations:**

12.1 The Plan was supported by a Strategic Environmental Assessment and Habitats Regulation Assessment. It is considered by both the Examiner and Council Officers that the Plan meets the Basic Conditions in terms of sustainability.

**13.0 Internal/external consultation undertaken:**

13.1 The Marton Moss Neighbourhood Forum has undertaken consultation on the Neighbourhood Plan, which is set out in the Consultation Statement submitted with the Regulation 16 draft of the Plan. Officers have worked alongside the Neighbourhood Forum since its establishment and provided comments on the plan prior to Regulation 14 stage and on the consultation draft of the plan at Regulation 14 and 16 stages. The Consultation Statement details who has been consulted on the plan through the process, including the local community and consultation bodies as set out in Schedule 1 of the Neighbourhood Planning Regulations.

**14.0 Background papers:**

14.1 Background information and various submitted documents can be accessed on the Blackpool Council Website under the following link:

[www.blackpool.gov.uk/martonmossnp](http://www.blackpool.gov.uk/martonmossnp)

**15.0 Key decision information:**

15.1 Is this a key decision? Yes

15.2 If so, Forward Plan reference number: 17/2023

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

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

**16.0 Call-in information:**

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

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

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**17.0 Scrutiny Committee Chairman (where appropriate):**

Date informed: 27 October 2023 Date approved:

**18.0 Declarations of interest (if applicable):**

18.1

**19.0 Summary of Discussion:**

19.1

**20.0 Executive decision:**

20.1

**21.0 Date of Decision:**

21.1



**22.0 Reason(s) for decision:**

22.1

**23.0 Date Decision published:**

23.1

**24.0 Alternative Options Considered and Rejected:**

24.1

**25.0 Executive Members in attendance:**

25.1

**26.0 Call-in:**

26.1

**27.0 Notes:**

27.1

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# Marton Moss Neighbourhood Plan 2020 - 2030



Referendum Plan  
June 2023

*MARTON MOSS NEIGHBOURHOOD FORUM*

*Front cover picture – open land at Chapel Road as viewed from Eastbank Avenue*

This Plan has been prepared by Marton Moss Neighbourhood Forum with the assistance of



## Foreword

I never thought I would become involved in planning the future of the Moss (I'm a dentist by trade, now retired) let alone lead the Forum. However, having attended the public meetings put on by the Council, to consider how the area should be planned, I became drawn in. I realised this was a good opportunity to properly guide what should and shouldn't happen.

I am a great believer in doing things the 'right' way, doing it 'by the book'. This plan is offered as the book. I know many local residents have been frustrated by the very strict controls on new building, set by Core Strategy Policy CS26. Yet at the same time the residents want to keep the open aspects, green spaces and the distinctive charm of the area.

Despite Policy CS26, some inappropriate development and housing has been allowed in recent years on appeal, justified on land supply grounds. This is no way to properly plan or to preserve local character.

The challenge with the Neighbourhood Plan has been to get the right balance between enabling well designed modest amounts of development whilst still keeping the local character of the Moss. I hope you agree we've pitched it about right.

Preparing the Plan has been a big effort. I would like to thank the Forum's Committee for their big commitment to the task and the assistance of Julian Jackson from Envision. I also thank all the Members of the Forum for your support.

Stephen Woodhouse - Chairman of Marton Moss Neighbourhood Forum

## MARTON MOSS NEIGHBOURHOOD FORUM

The Forum came into being in unusual circumstances. The Blackpool Core Strategy – Part 1 of the Local Plan – includes Policy CS26 that only applies to Marton Moss. This Policy has two parts to it. One part strictly limits new development in a manner that treats Marton Moss as an area of countryside. However, those restrictions are intended to apply only until such time as they are replaced by *“neighbourhood policy which supports the retention and enhancement of the [area’s] distinctive character, whilst identifying in what circumstances development including residential may be acceptable.”* The full text relating to Policy CS26 is reproduced in Appendix A.

The background to Policy CS26 is that at an early stage of preparing the Blackpool Core Strategy large scale development was considered a possibility in the south east part of Blackpool, including Marton Moss. Following receipt of many local objections to this proposal and the Council reassessing the amount of housing needed across Blackpool, the scale of proposed development in this part of the borough was greatly reduced.

Following adoption of the Core Strategy in 2016 Blackpool Council started a dialogue with the Marton Moss community as to how a neighbourhood planning type approach could be taken forward. During November 2017 the Council held engagement ‘drop-in’ events for local people as part of a consultation process. The publicity material produced explained the two options of how a neighbourhood planning type approach could come about. At the time Blackpool Council were about to start work on the Part 2 Local Plan – the Site Allocations and Development Management Policies document. Developing neighbourhood policy as part of the Part 2 Local Plan was presented as one option, the other option put to local people was for the community to prepare a Neighbourhood Development Plan.

The consultation asked local people to send in written comments to the Council saying which neighbourhood planning type approach they supported. The outcome of this ‘poll’ was that most people who replied, all but by a small margin, voted for a Neighbourhood Plan to be prepared.

Given that the Marton Moss area does not have a Parish Council a Neighbourhood Forum comprised of local people needed to be established to produce the Neighbourhood Plan. To help with setting up a Forum the Council arranged a residents’ meeting in May 2018 to explain what would be involved.

Out of this meeting a group of people came together to consider the remit of a Forum and discuss the planning issues affecting the area. The Place Standard<sup>1</sup> approach was used to help these people express their understanding of the Moss. These discussions were later pursued with the wider community at regular, formally minuted meetings and from these the applications seeking designation of the Neighbourhood Area and Forum were prepared and submitted to the Council.

On 26 March 2019 Blackpool Council formally designated the Marton Moss Neighbourhood Area and Forum. The boundaries of the Area are identical to the spatial extent of Policy CS26. The overall purpose of the Forum, along with its aims and ambitions are set out in Appendix B.

At the time of designation, the Forum had over 70 members. As of January 2022, Forum membership stood at over 300 households drawn from all sectors of the local population including the traveller community, there are also approximately 650 members of the private Marton Moss Facebook group.

The establishment of the Forum means that the Neighbourhood Plan and Part 2 of the Local Plan are being prepared separately but alongside one another. Certain general policies in Part 2 of the Local Plan relate to the whole of Blackpool including Marton Moss, but site-specific policies for the Neighbourhood Area are only put forward in the Neighbourhood Plan.

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<sup>1</sup> <https://www.placestandard.scot/>

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# 1. INTRODUCTION

1. It would be all too easy to dismiss why local residents place Marton Moss in such high regard. This is because at first sight the Area appears to comprise a random mixture of buildings with different design styles. However, it is a place with a fascinating history that once played an important part in providing fresh food produce for the tourism related demands of Blackpool and town dwellers elsewhere in Lancashire and Yorkshire. There are a few fine surviving buildings that pre-date that period and numerous remaining residences characteristic of market gardening.

2. Today the many once thriving horticultural businesses of the Moss are very much reduced with only very few now operating. The area has become a predominantly residential one, all be it interspersed with a few other commercial enterprises. This change over the last 50 years or so has meant that the Moss has become generally more open and pastoral in character typified by homes (some original, some modern replacements) with large gardens, interspersed with numerous plots of land used for equestrian related activities and larger tracts of open land. These uses each contribute to the distinctive appearance of Marton Moss and provide touchstones for its future development.

## What is a Neighbourhood Plan?

3. It is a development plan that is prepared by representatives of a local community, either a Parish Council, or where there is not one, as in Marton Moss, a specially set up Neighbourhood Forum. A Neighbourhood Plan can cover a wide range of planning matters but not those of a strategic nature, nor minerals extraction and waste management. Those latter aspects along with a full range of detailed planning policies applicable across Blackpool are the responsibility of the Borough Council set out in the various documents that make up the Local Plan. Once the Marton Moss Neighbourhood Plan is completed it will have equal official status to the Local Plan for the matters it covers.

## How far into the future will the Neighbourhood Plan look?

4. The time period over which a Neighbourhood Plan can apply can range from 5 to 15 years. The Blackpool Local Plan Part 1: Core Strategy and Part 2: Site Allocations and Development Management Policies have a plan period of 2012 to 2027. However, the Forum has decided that the appropriate period for this Neighbourhood Plan is 10 years. In precise terms this means the Plan period is from 1 April 2020 to 31 March 2030.

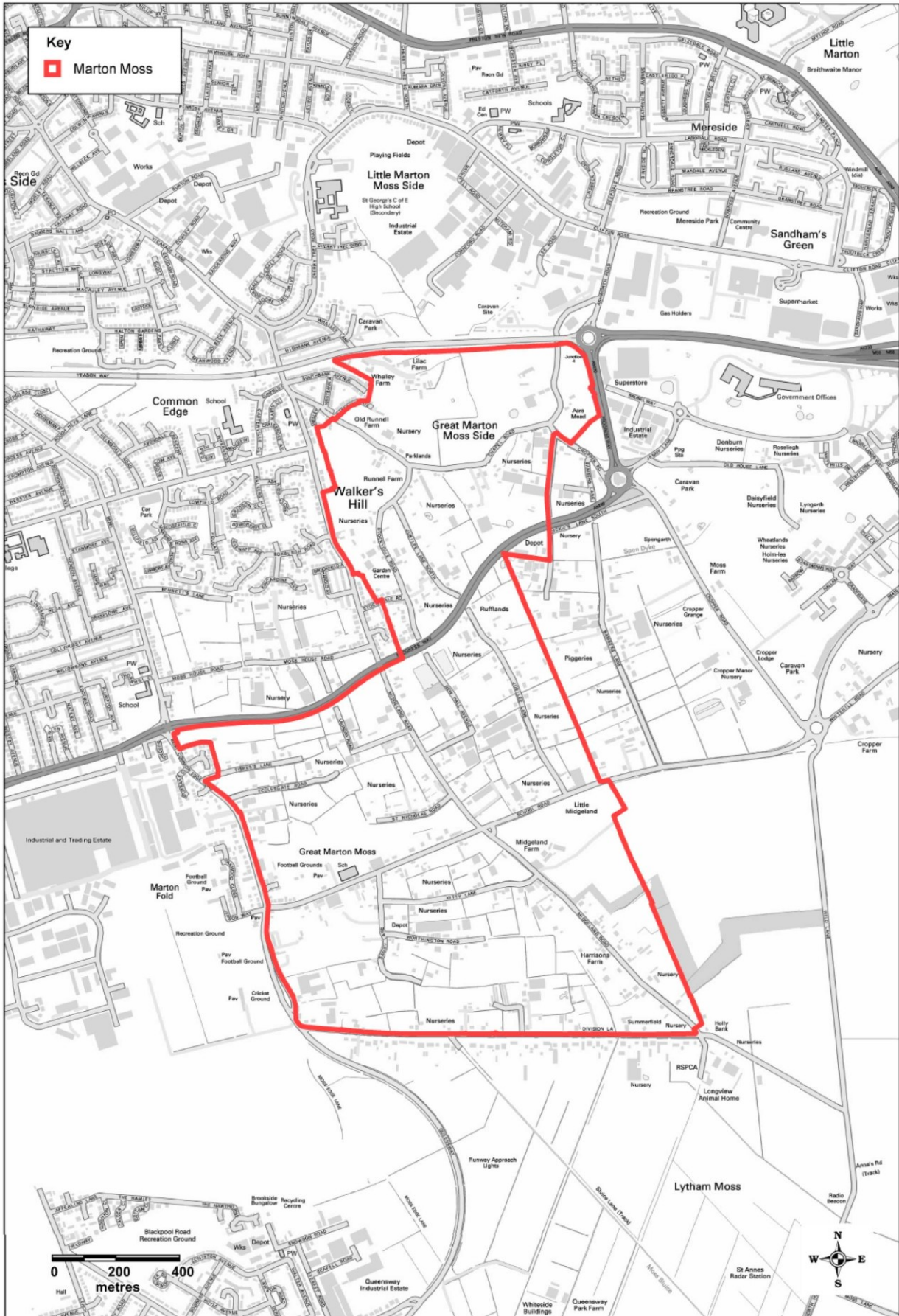
## What area does the Plan cover?

5. The Plan Area coincides with the spatial extent of Core Strategy Policy CS26 which will be replaced by the Neighbourhood Plan. The Plan Area is shown on the next page.

## What stage of preparation has the Plan reached?

6. The Plan has now been examined by independent Examiner Andrew Mead. He recommended the Plan should be modified and then proceed to referendum. The Examiner's Report can be viewed at <https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Marton-Moss-NP-Examiner-Report-290323.pdf>. The Council has considered each of the recommendations and the reasons given for them in the Examiner's Report as required by Regulation 12 of Schedule 4B of the Town and Country Planning Act 1990. The Council endorses all the recommended modifications and the reasons given for them. The Council is satisfied that the Plan, as modified to accord with the recommendations in the Examiner's Report, meets the legal requirements and basic conditions as set out in legislation.





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## Neighbourhood Plan Area

## **What are the main changes that have been made to the content of the Plan since the previous engagement stage?**

7. The proposed modifications are set out in the [Examiner's Report](#).

## **What must Neighbourhood Plans take account of?**

8. Neighbourhood Plans cannot be produced in isolation from other planning policies. Neighbourhood Plans are required by the relevant regulations to accord with certain Basic Conditions or requirements, these are reproduced in full in Appendix C. Firstly Neighbourhood Plans must have regard to national planning policies and advice issued by the Government. These are set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance. Both contain relevant general considerations as well as specific aspects that refer directly to Neighbourhood Plans.

9. Neighbourhood Plans are also required to generally conform with the strategic policies of the development plan (see Appendix D). The development plan mainly comprises the various parts of the Blackpool Local Plan. This means the adopted Core Strategy (Part 1) and in the adopted Site Allocations and Development Management Policies (Part 2 of the Local Plan). The various documents that make up the Minerals and Waste Local Plan (produced in partnership with Lancashire County and Blackburn with Darwen Borough Councils) also comprise parts of the development plan. All planning applications are decided first and foremost taking account of the relevant policies and proposals of the development plan; account is also taken of other - 'material considerations' – i.e. relevant matters.

10. A further Basic Condition relevant to Neighbourhood Plans is that they should contribute to the achievement of sustainable development – the separately produced Strategic Environmental Assessment refers to this in detail. Finally, Neighbourhood Plans are expected to comply with other environmental requirements in the case of Marton Moss this is particularly in relation to internationally protected wildlife; that is covered by the Habitats Regulations Assessment. A Basic Conditions Statement has been produced and shows how this Neighbourhood Plan meets all the Basic Conditions.

11. This Plan uses information from a wide range of sources. Appendix E lists the key evidence documents that have been drawn on, including specially commissioned work that has also been carried out. Through the Government funded Neighbourhood Support Programme, numerous Technical Support packages have been used to contribute evidence to the Plan's preparation. These packages include Housing Needs Assessment, Design including Design Codes and Site Options & Assessment, the latter building on a Call for Sites – plots of land suggested for housing development by their owners, and Housing Site Viability.

## **What are the future stages of the Plan?**

12. The next stage is the referendum of all voters in the Marton Moss Area. If the Plan passes the referendum with a majority of local residents' support the Council will be able to formally 'make' the Plan and it will come into full effect.

## 2. VISION AND OBJECTIVES

13. Taking its cue from the overall purpose, aims and ambitions of the Forum (Appendix B) the Plan's Vision of what the area will be like by the end of the Plan period (in 2030) is as follows:

### **Vision – The Forum's view of what Marton Moss will be like by 2030**

**14. Marton Moss has stayed mainly open and green in appearance with well-maintained public spaces and attractive main thoroughfares. It is a place that is easy to walk, cycle and horse ride through in safety on well connected-up signed routes and off-road paths that provide for healthy recreation. Midgeland Farmhouse and its' associated original buildings are partially retained and land nearby is a community park popular with local people.**

**15. The housing built over the 2020 – 2030 period has been in keeping with the character of the Moss and provides accommodation for a range of needs. The other significant buildings constructed over the Plan period are also well designed and respectful of the area. The development provided is well adapted to climate change by having minimal impact, including in terms of greenhouse gas emissions and energy use. The natural environment is home to a wider range of wildlife than it was in 2020. The area is now well drained with a very low risk of flooding.**



*Midgeland Road South*

16. To help to achieve the Vision a series of Objectives have been produced. The Objectives help decide the scope of the Plan and the remit of the key provisions of it – the Policies. The Objectives and how they relate to the Policies is set out in the following two tables.

## Objectives

	OBJECTIVE	HOW ACHIEVED?	OTHER BENEFITS
1	To preserve and enhance the distinctive heritage character, landscape, and overall appearance of the area.	Through good building design, limiting development densities and keeping important tracts of open land substantially undeveloped.	Increases local pride in the area and an aesthetically pleasing location is recognised to improve health and wellbeing.
2	To save from complete loss the historic Midgeland Farmhouse and original buildings.	By measures to preserve any remaining structures and/or a programme of archaeological recording.	Reduces the risk of vandalism and fly-tipping.
3	To safeguard and enhance natural habitats and improve the variety of wildlife, with new development required to achieve a net gain in biodiversity.	Through development avoiding harm to internationally as well as locally significant habitats and important species as well as requiring developers to contribute to biodiversity improvements.	Contributes to the open character and appearance of the area as well as feelings of well-being.
4	To ensure that new development is in keeping with the look, scale, and form of existing buildings.	Through good building design in accordance with the provisions of the Marton Moss Design Code.	Increases local pride in the area.
5	To enable housing development that meets a range of accommodation needs.	By supporting on appropriate sites new housing comprising a variety of accommodation types.	Helps enable local people to stay within the area and attracts in new residents, so diversifying the population.
6	To protect existing recreation grounds and provide additional open leisure space that is away from the coast and its wildlife functionally linked land.	By protecting existing recreational grounds as Local Green Space and opening-up land at Midgeland Farm for community park use.	Increases opportunities for physical exercise, improves mental well-being and the amount of social interaction.
7	To make it easier and safer to move through the area without being dependent on motor vehicles.	Through the provision of new/improved footpaths, bridleways and cycling opportunities connected to existing thoroughfares and open spaces.	Increases opportunities for physical exercise, improves mental well-being and amount of social interaction. Improvements in air pollution would be a direct benefit of reducing reliance on motor vehicles.
8	To support locally appropriate development proposals associated with horticultural and equestrian activities.	Through allowing appropriately sited installations and buildings plus for horticultural enterprises allowing complementary uses to financially support the main business.	Helps support local employment, and with equestrian uses, retain the openness of the area. There would also be improvements to health and wellbeing.
9	To ensure that new development will be safe from flooding for its lifetime without increasing risk elsewhere and, where feasible, improves land drainage.	By new development avoiding land at risk of flooding, incorporating fully compliant sustainable drainage systems, and providing improvement works to adjacent drainage dykes where necessary.	Helps maintain open water features for the benefit of local wildlife.
10	To allow tourism accommodation uses that are in keeping with the open character of the area.	By supporting tourism proposals that maintain the open, pastoral character of the Moss.	Helps support local employment and bring benefits to the local economy as a whole.

## Which Policies Will Deliver What Objectives?

	OBJECTIVES	POLICIES									
		MM1	MM2	MM3	MM4	MM5	MM6	MM7	MM8	MM9	MM10
1	To preserve and enhance the distinctive heritage character, landscape and overall appearance of the area.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
2	To save from complete loss the historic Midgeland Farmhouse and original buildings.								✓		
3	To safeguard and enhance natural habitats and improve the variety of wildlife, with new development required to achieve a net gain in biodiversity.	✓	✓		✓	✓					
4	To ensure that new development is in keeping with the look, scale and form of existing buildings	✓			✓	✓		✓			
5	To enable housing development that meets a range of accommodation needs.				✓	✓					
6	To protect existing recreation grounds and provide additional open leisure space that is away from the coast and its functionally linked land.								✓	✓	
7	To make it easier and safer to move through the area without being dependent on motor vehicles.		✓								✓
8	To support locally appropriate development proposals associated with horticultural and equestrian activities.						✓	✓			
9	To ensure that new development will be safe from flooding for its lifetime without increasing risk elsewhere and where feasible improves land drainage.	✓			✓	✓					
10	To allow tourism accommodation uses that are in keeping with the open character of the area.		✓								

### 3. SPATIAL PORTRAIT

#### Physical Profile

##### Where is Marton Moss?

17. The designated Marton Moss Neighbourhood Area is at the south eastern extremity of Blackpool, to the east of the Airport. It is away from the sea, being over 2km from the coastline. The north east corner of the Area is close to the western end of the M55 motorway.

18. The term 'Marton Moss' historically refers to a larger area than is covered by this Neighbourhood Plan. Some of the land excluded from the Neighbourhood Plan Area within Blackpool has been, or is in the process of, being developed; the remaining part is within Fylde Borough. However, for the purposes of this Neighbourhood Plan the terms 'Marton Moss', and the 'Moss' for short, relate only to the designated Neighbourhood Area.

##### What comprises Marton Moss?

19. The northern boundary of the Neighbourhood Area is formed by Yeadon Way which continues the westward alignment of the motorway towards the South Shore part of Blackpool town. The eastern boundary of the Area coincides with the administrative boundary of Blackpool with Fylde Borough as does the southern boundary also marked by Division Lane, land on the northside of which is within the Area. The south western boundary of the Area broadly follows Common Edge Road and then cuts eastwards along the south side of Progress Way before switching northwards approximately aligned with Midgeland Road and finally heads diagonally north eastward across to Yeadon Way.

20. The Area comprises approximately 2 square kilometres. The land is largely flat and low lying, mostly between 5 and 10 metres above sea level. Prior to human settlement, Marton Moss, as the name suggests, was an area of open moss land with poorly drained mainly peaty soils. The land immediately to the east and south in Fylde Borough had similar natural characteristics.

21. It is not possible to say precisely how many people currently live at Marton Moss because the official statistical areas do not closely coincide with the Neighbourhood Area boundary. At the time of the 2011 Census of Population the 'best matching' four of the five statistical areas which cover at least part of Marton Moss had 1,249 residents, whereas counting all five areas the number was 1,616 residents but a substantial proportion of those lived outside the Area. However, in comparison with the Borough as a whole, these figures equate to only approximately 1% of the total population of Blackpool.

##### Historic Character

22. Only a few discovered remains of early human occupation of the Area exist. A Bronze Age axe and animal skin coracles have been found. However, there are some surviving traces of human settlement construction from these times. It appears likely that the generally marshy ground conditions did not lend themselves to human habitation although there were small areas of slightly higher, drier land. The first recorded works to drain the wider area date from the 14<sup>th</sup> Century however for the most part intensive draining of Marton Moss did not occur until the widespread enclosure of fields, from the mid-18<sup>th</sup> to mid-19<sup>th</sup> Centuries. The exception to this is the slightly higher ground in the vicinity of the long-established Chapel Road where the land was enclosed earlier, in Medieval times, a process referred to as 'Ancient Enclosure'. Typically though, across most of the Area, the field boundaries from the

later land enclosures were marked by drainage ditches accompanied by trees (often pollarded) and hedgerows. Paths and bridleways followed the same alignments. Many of these features still exist.

23. Human habitation of the Area only occurred very gradually in the post-Medieval period. Building construction was confined to the few areas of dry land when the use of locally sourced materials prevailed - stone cobbles for walls and thatching over timber cruck framed roofs. A few preserved examples of these structures remain as listed buildings (see Appendix F) they provide a tantalising glimpse of what the building forms were like when the Area was sparsely populated. In other buildings dating from this time the traditional construction has since been replaced by or concealed by tiled roofs and brick facades.

24. The mossland was first used in Medieval times for peat extraction, with excavations spreading out from the few main trackways that existed. It was not until this upper layer of peat had been removed that the ground was used for cultivation. Initially there was no exceptional demand for food produce from the reclaimed land. That situation changed when Blackpool, itself up until then only a small settlement, was connected to the national railway network; the first train services operated from 1846. A market for horticultural produce was then opened-up not just with the burgeoning seaside resort but also through demand from elsewhere in Lancashire, and especially Yorkshire.

25. The architectural tradition of the Area prevailing today is mainly derived from the relatively recent past - the 19<sup>th</sup> Century - when the main demand for building construction came from the horticultural businesses. Typically, market garden plots were between 1¼ and 1¾ of an acre in size (about half a hectare) and were usually occupied by a road frontage house with an access track down one side of the dwelling to the cultivated area at the rear. Such houses were originally modest proportioned cottages which were often later replaced by taller Victorian villas. The need to house other horticultural workers led to numerous additional dwellings being built as 'twin' (semi-detached) and short terraces on or near the holding.

26. The accessibility of the railway opened-up a source of mass-produced bricks from east Lancashire and roofing slate from Cumbria and Wales. The bricks used were typically red and glossy finished particularly when used on the front elevations of houses. Vertical sliding sash windows became popular instead of the earlier casement ones and Yorkshire style (horizontal sliding) sashes. Wealthier owners added more elaborate detailing to their residences with stone lined window openings, perforated bargeboard detailing and terracotta ridge tiles and finials. The road frontages of these homes were usually marked with brick-built garden walls and stone gate posts.

27. The 20<sup>th</sup> Century brought different building styles reflective of the widely prevalent national fashions of the times. As elsewhere in the country, increased mobility of people with the rising use of the motor car led to an influx of new residents into the Area particularly during the 1930's. At that time numerous semi-detached brick-built houses were constructed with harling (rendered finish) first floor facades. Also, many bungalows were erected as detached or semi-detached properties with central doorways flanked by bays on either side.

28. From the 1950's onwards various individually designed detached houses and bungalows were constructed on infill plots between other properties or as replacements for earlier residences. These homes were sited on either main road frontages or directly facing the narrower side lanes. Very little in-depth housing development occurred in the Area during the 20<sup>th</sup> Century. More recently, housing on small culs-de-sac has occurred mostly just outside the boundary of the designated Area, except that is for the substantial 'Magnolia Point' housing estate between Midgeland Road and Stockydale Road.

29. Market gardening activity on the Moss probably reached its peak in the 1960s. Since then, the large rise of international trade in salad foodstuffs and flowers has led to highly competitive market conditions with the business being increasingly dominated by large-scale producers. This has caused most of the local growers to cease their activities and led to the redundancy of their glasshouses.

## Present Day Character

30. The settlement pattern that exists over most of Marton Moss today largely stems from individual landowners buying up and sub-dividing land into small plots to devote to market gardening during the second half of the 19<sup>th</sup> Century. However, some parts were not used for intensive horticulture. In the north of the Area, particularly the land between Chapel Road and Yeadon Way was generally not so used. The latter remains as open land and is considered to be of archaeological significance due to early field enclosure. It also acts as an open break separating the more built-up parts of Marton Moss from the more urbanised parts of Blackpool.

31. Further south another tract of land that has long remained largely open is around Midgeland Farm on the eastern edge of the Area. The locally listed former farmhouse is now derelict, the surrounding land was used as a landfill site in the late 1960s and 1970s, it is now mown for hay. Two more substantial areas of open land – south of Ecclesgate Road and in the vicinity of Worthington Road and Sandy Lane are also tracts that have largely not been used for market gardening.

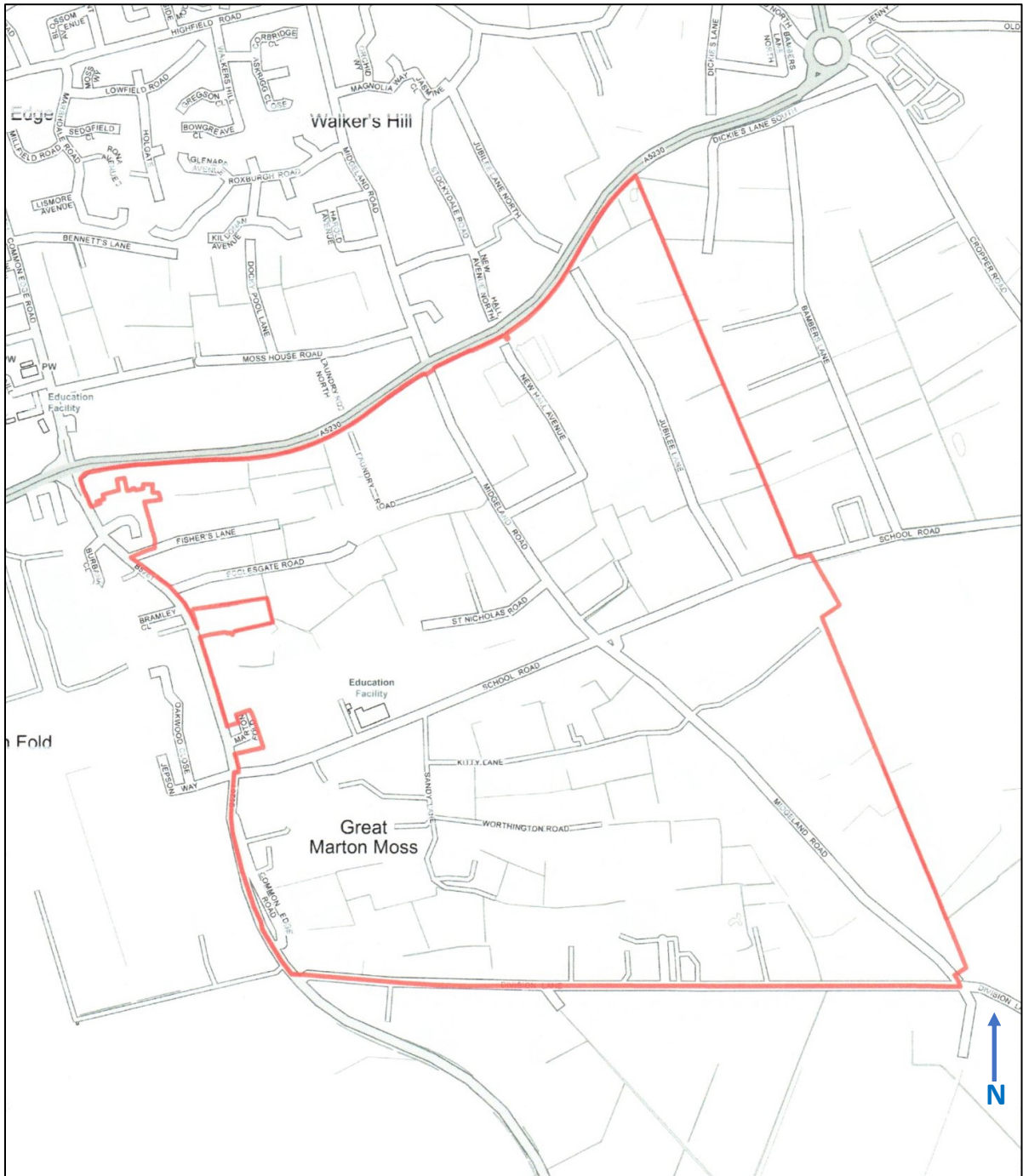
32. These landholdings, with their naturalised field boundaries and quiet lanes, are the basis of the pastoral semi-rural present-day character of the Moss. However, this is an appearance that has partly evolved from the decline of horticultural activities such that the Area has become predominantly residential. Similarly, whilst away from the main through roads the Area has a peaceful charm, by contrast the arterial routes of Progress Way, Common Edge Road and School Road are busy with traffic and congested at peak hours.

33. Now only very few market garden producers remain active within the Area. Some former glasshouses lie derelict, but most have been completely removed with many of the plots acting as large open gardens for individual houses. Other plots have become paddocks for horses, flanked by stable blocks. There are also caravan uses in numerous guises that occupy former market garden plots – such as vehicle storage, tourist camping sites and compounds for the Traveller and Showperson families. Some of the former horticultural land is mown occasionally for hay, grazed mainly by horses or is completely un-used. There are various other small business uses scattered across the Moss.

34. Two locations have been re-modelled to act as surface water flood attenuation basins, one south of Chapel Road and the other off Ecclesgate Road. These only exceptionally hold water in times of heavy storms. Elsewhere there are some static water bodies - a man-made fishery lake at New Hall Avenue just south of Progress Way and a few isolated naturalised ponds. The Area however supports an extensive network of drainage dykes that developed as the Moss was drained and became used for market gardening. These watercourses remain important for drainage and flood control purposes today, they also act as significant wildlife habitats.

35. The southern two-thirds of the Moss was designated a Conservation Area in 2019 – the extent of this is shown on the map overleaf. The land excluded from the Conservation Area, north of Progress Way to Yeadon Way, is of a similar character except there is a modern housing estate at 'Magnolia Point', served off Midgeland Road North, and a small enclave of mixed commercial uses off Dickies Lane North in the north east of the Area.





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### Marton Moss Conservation Area

## Community Profile

36. The characteristics of the Marton Moss population, the homes people live in, and their economic status differ quite markedly from the residents of Blackpool as a whole. Given that only about 1% of Blackpool's population lives on the Moss it would be surprising if there were not some differences. However, the variations between the two are not a statistical quirk but highly relevant to how the two areas should be planned. Unfortunately, up to date data are hard to come by given that the main source originates from the 2011 Census of Population.

37. Nevertheless, compared to Blackpool as whole, Marton Moss has:

- a greater proportion of older people and fewer in younger age groups (adults under 45 and children) a situation that became more pronounced between 2001 and 2011 suggesting that families moved away from the Neighbourhood Area during that time<sup>2</sup>;
- a much higher percentage of detached properties, a similar proportion of terraced houses but far fewer flats;
- a greater incidence of owner-occupied homes and far lesser occurrence of rented properties, especially socially rented ones;
- much higher average house prices; and,
- far less social deprivation.

38. The nationally produced Indices of Multiple Deprivation 2019 provide ranks for localities across a wide range of social and economic factors. Again, the statistical areas used do not fit exactly within the extent of the Neighbourhood Area but using the data output area that is most centrally located within the Moss, the overall deprivation ranking here is close to the median average for England. Whereas parts of Blackpool town centre have some of the most deprived communities nationally.

39. Looking at the individual factors behind the data, reveal that the Moss fares better than the national average in terms income levels, unemployment rates, frequency of crime and incidence of children in deprived families. Whereas the Neighbourhood Area performs less well in terms of health disability, local environment and education, skills and training. The health disability is probably linked to the older than average population, whereas the low local environment ranking is likely connected with the limited amount of publicly accessible open space.



*Jubilee Lane South*

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<sup>2</sup> This was likely due to a lack of suitable housing being available locally; a trend that has probably continued in more recent times due to policy restrictions on new residential development.

## 4. LOCAL PLAN CONTEXT

40. To help appreciate where the Neighbourhood Plan will fit into the overall set of policies that guide new development in the Area it is important to know the scope of the various Plans that make up the statutory development plan for Blackpool as a whole.

41. There are several Local Plans that cover the Marton Moss Neighbourhood Area:

- Blackpool Core Strategy – Part 1 of the Local Plan adopted in January 2016
- Blackpool Site Allocations and Development Management Policies - Part 2 of the Local Plan adopted in February 2023
- Joint Lancashire Minerals and Waste Local Plan – partly being reviewed

42. For minerals and waste matters Blackpool Council works in partnership with Lancashire and Blackburn with Darwen Councils. There are various documents that make up the Joint Lancashire Minerals and Waste Local Plan and part of it is currently being reviewed. There are no minerals and waste proposals that apply to the Marton Moss Area. However, small parts of the Moss are covered by Minerals Safeguarding Areas. These apply to land around the junction of Midgeland Road and School Road and the south eastern corner of the Midgeland Farm site.

43. Policy M2 of the Minerals and Waste Local Plan aims to restrict permanent development within the Safeguarding Areas so as to allow the prospect of future extraction of valuable, workable underground minerals. The mineral being safeguarded at Marton Moss is silica sand and the implications for surface development are limited and referred to in more detail in the separate Housing Site Allocation Appraisal document.

44. The other Local Plans that cover the Marton Moss Area are those prepared solely by Blackpool Council. Overall strategic direction is provided by the Core Strategy. The strategic policies relevant to the Neighbourhood Plan are listed in Appendix D. During the preparation of the Core Strategy a strategic development option considered was major growth in the south east of Blackpool including Marton Moss. This option was subsequently scaled back and not pursued within the 'remaining lands' of the Moss which although identified as a 'strategic site' in Policy CS1 were also made subject to Policy CS26. This latter policy and its justification text are reproduced in Appendix A.

45. Policy CS26 applies a very restrictive approach to controlling development at Marton Moss, similar to the approach generally taken in countryside areas. These restrictions are to apply until a Neighbourhood Planning type approach for the Area is brought in to replace them.

46. The Plan period for the Core Strategy is 2012 to 2027. This is particularly significant for deciding what the housing indicator for the Neighbourhood Plan should be, especially as the time period for this Plan is 2020 to 2030. Not surprisingly given the lapse of time, more up to date household projections have been published and the method for calculating housing numbers has also been revised. This matter is explained in more detail in Appendix F.

47. The Site Allocations and Development Management Policies - Part 2 of the Local Plan contains general policies that will apply to development proposals in the Moss but no site-specific ones relating to the Neighbourhood Area. So, some policies in Parts 1 and 2 of the Local Plan are relevant to the Neighbourhood Plan and are referred to in Chapter 5 in relation to each proposed Neighbourhood Plan Policy.

## 5. POLICIES

48. This is an important Chapter of the Neighbourhood Plan as it sets out the policies for how new development will be managed – i.e. guided and controlled. When this Plan is finalised, the policies will be used to help decide all relevant planning applications on the Moss. Some of the policies will apply across the whole Area, others refer to proposals for individual sites.

49. Each policy is presented in the same way. First the *Background Justification* section explains what the issues are for the topic covered by the policy. The *What the Community Says* section summarises the views given by local people in the Residents' Survey carried out in the autumn of 2019 and the Evidence and Policy Options Engagement in the summer of 2020.

50. The *Sources of Evidence* section lists the main documents and other survey work that have informed the topic covered by each policy. The *National Planning Policy and Advice* section refers to the key relevant aspects of the National Planning Policy Framework and Planning Practice Guidance published by the Government that are relevant to the policy. The *Relevant Local Plan Policies* are briefly mentioned in this section citing both the Blackpool Local Plan Part 1 Core Strategy policies and the Part 2 of the Local Plan – Site Allocations and Development Management policies.

51. Each proposed policy is shown in **bold blue text**. Where a policy refers to the 'Policies Map' it means the Marton Moss Neighbourhood Plan's proposed additions to and, in the case of Core Strategy Policy CS26, deletion from the Blackpool Policies Map. This is reproduced as an A4 sized image as the last page of this Plan, it can be viewed at higher magnification on the Marton Moss Neighbourhood Forum website<sup>3</sup> where all the Neighbourhood Plan documents can also be viewed.

52. How the policies will be used and brought into effect is set out in Chapter 6 – Plan Implementation, Monitoring and Review.

**53. Whenever relevant, the policies of the Plan need to be read together to help fully establish whether a development proposal is likely to be acceptable or not.**



*Blowing Sands, Common Edge Road*

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<sup>3</sup> <https://www.martonmossforum.org/>

## A. Design and the Local Environment

### 5.1 Building Design – To require new buildings to be well designed, be in character with the local Area and improve biodiversity

#### *Background Justification*

54. Although at first sight Marton Moss appears to have a random mix of architectural styles, there are numerous remaining traditional buildings that provide a cohesive design context. Also, across most of the Area is the legacy of one-acre-plus (half hectare) sized market garden plots which have provided an enduring low building density template. Although nearly all the glasshouses have been removed the boundary features – hedges and dykes – of many of the holdings remain. Of the vernacular buildings, many are former market garden residences – typically individual Victorian villas and short terraces of houses. A few older structures with cobble walls and/or thatched roofs stand out as listed buildings. Numerous residential properties on the Moss are served by minor lanes and stand close to the carriageway edge.

55. Specific Design Code work, which included engagement with local people, has been carried out to inform the Neighbourhood Plan and the essential defining elements of the design for new development so that is in character with the local vernacular styles are summarised below:

- *Cul-de-sac layouts* – not appropriate in the Conservation Area (so here new development should front on to existing roads), elsewhere new access roads should not exceed 60 metres in length, be straight and serve no more than 8 dwellings;
- *Parking* – a minimum of two on-plot spaces to reduce the visual impact from on-street parking;
- *Landscape* – protection of major open land tracts from development;
- *Set-backs, gardens and boundary treatments* – dwelling plots to have front gardens behind a hedge or low brick wall with dwellings set back at least 5 metres from the road;
- *Public rights of way* – retained within new developments and kept clear from encroaching vegetation;
- *Drainage* – to use Sustainable Drainage Systems incorporating retained dykes, with clearance required for any that are blocked; the avoidance of culverting;
- *Materials* – red brick or rendered building elevations under slate or red pantile roofs;
- *Density and housing mix* – except for short terraces, densities shall not exceed 8 dwellings per hectare (dph) in the Conservation Area and 15 dph elsewhere, with dwelling sizes to contribute to a mix of provision in the wider area; and,
- *Traffic calming* – any new streets to be designed to allow only slow vehicle movements.

For full details see the separate document – Marton Moss Design Code 2020.

56. As the Moss is a flat lowland area an extensive drainage dyke system was created when the land became cultivated. This network of water courses was maintained by the market garden proprietors as their businesses depended on well drained soils. Following the decline of horticultural production many of the dykes have fallen into disrepair, some are culverted, and others have been filled in. Localised surface water flooding occurs on occasions and although two large water attenuation basins have been constructed, the likelihood of such events could increase in the future with climate change. For Sustainable Drainage Systems to work they need to be connected to a fully functioning dyke network. Works that would involve raising the level of the ground to create a higher site often cause surface water to back up elsewhere and are also inappropriate in overall design terms.

57. Existing tree cover is limited on the Moss so new building construction should aim to retain existing healthy trees which along with improvements to ponds and watercourses would help achieve a net gain in biodiversity from development proposals. An exemplar way of delivering accredited wildlife-friendly schemes is for developers to sign up to the Building with Nature<sup>4</sup> initiative.

58. The Marton Moss Biodiversity Strategy 2022, identifies the following opportunities biodiversity improvement measures that can be included in new developments based on wildlife assets of the Area:

- Protecting existing ponds, reedbeds and watercourses along with restoring/creating these as part of Sustainable Drainage Systems.
- Retaining existing hedgerows and trees as well as adding new planting to these features.
- Setting aside parts of sites and gardens for scrub, tall herb and/or long grass.
- Providing log piles of rotting wood.
- Installing bird and bat boxes on buildings.
- Building grassed-over low mounds of brick/stone rubble, branches, and old pipes as hibernacula.
- Creating extensive areas of wildlife meadow.

59. The Habitats Regulations Assessment for the Neighbourhood Plan considers to what extent development proposals on the Moss might adversely affect the integrity of internationally designated (Special Protection Area /Ramsar) wildlife sites located at the nearby Ribble and Alt Estuaries. The Assessment concludes that such an effect is possible and recommends in relation to the aspect of recreational pressure the Neighbourhood Plan:

- should add a caveat that residential development will only be supported if the developer commits to providing homeowner packs to new residents identifying the disturbance sensitivity of the wintering waterfowl using the Ribble Estuary, encouraging responsible dog ownership and identifying other areas of accessible greenspace that could be visited as an alternative. Similarly, improvements to access to existing footpaths and bridlepaths should be contingent on them not exacerbating recreational pressure issues at the SPA/Ramsar site<sup>5</sup>.

60. The Strategic Environmental Assessment Draft Environmental Report for the Neighbourhood Plan makes the following general recommendation relating to development proposals on land associated with ancient enclosure and so having a high potential for the presence of archaeological remains, in such instances:

- that archaeological potential must be explored and appropriate action taken to protect and record features of importance.

### *What the Community Says*

61. Many local people cherish the existing character of the Moss and want to see it retained as much as possible. In the Residents' Survey the Area was commonly described as having a 'peaceful rural aspect'. The natural environment of the Moss was rated as its most important feature. Although there is a common acceptance from many of the Survey respondents that some development should be allowed, a major concern is that this might cause a loss of identity through new buildings being built which are out of character. Several respondents also expressed concerns about the state of repair of the dyke network. Most of the responses received to the Evidence and Policy Options Engagement supported a broadly based policy citing general good design principles that refer to the Design Code. The earlier feedback on the Code itself supported lower density schemes, off-road parking, protection of open land, traditional boundary treatment, useable public rights of way, and well-maintained drainage ditches.

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<sup>4</sup> <https://www.buildingwithnature.org.uk/about>

<sup>5</sup> See Policy MM10 for this latter matter to be taken account of

### *Sources of Evidence*

Historic Characterisation of Marton Moss, 2009

Marton Moss Conservation Area Appraisal, 2018

Marton Moss Design Code, 2020

Watercourse and flood risk mapping, latest published

Marton Moss Biodiversity Strategy, 2022

Habitats Regulations Assessment: Marton Moss Neighbourhood Plan, 2022

Strategic Environmental Assessment: Marton Moss Neighbourhood Plan, Environmental Report, 2022

### *National Planning Policy and Advice*

62. Achieving high quality buildings beautiful and sustainable buildings and well-designed places are key features of National Policy. Plans should have a clear design vision and expectations as can be achieved through the production of design codes so as to establish or maintain a strong sense of place, with policies developed along with the local community to reflect residents' aspirations and an area's defining characteristics. National Policy also advocates that development plans should have policies that support appropriate measures to help ensure future resilience of communities and infrastructure to climate change impacts including with the assistance of Sustainable Drainage Systems. Achieving biodiversity net gain is also a fundamental requirement of new development proposals, an aspect that should be integrated into a scheme's design.

### *Relevant Local Plan Policies*

63. Local Plan Part 1 Core Strategy Policy CS1: Strategic Location of Development point 3 refers to recognising the important character of land at Marton Moss. Policy CS6: Green Infrastructure – sets out how high-quality and well-connected networks of green infrastructure in Blackpool will be achieved. Policy CS7: Quality of Design - requires that new development should be well designed and enhances the character and appearance of the local area. In respect of heritage – Policy CS8 - development proposals should respect and draw inspiration from the built, social, and cultural heritage of Blackpool and complement its rich history.

64. Core Strategy Policy CS9: Water Management - requires that all new developments must incorporate appropriate mitigation and resilience measures to minimise the risk and impact of flooding, incorporating appropriate Sustainable Drainage Systems (i.e. that meet approved technical specifications) and avoiding the discharge of surface water into the sewer network.

65. Part 2 of the Local Plan in Policy DM1: Design Requirements for New Build Housing Development - reinforces the importance of designs and layouts responding to a local character. The Policy also sets out a series of minimum expectations on internal and external space requirements, waste management and parking arrangements. It also advocates what energy and carbon saving measures should be built into new homes. Policy DM41: Transport Requirements for New Development – sets out all the factors to be taken account of in terms of accessibility.

66. Local Plan Part 2 Policy DM17: Design Principles – sets out the fundamental aspects of good design and Policy DM27: Conservation Areas – the particular design expectations that apply in these locations. Policy DM21: Landscaping – outlines the design requirements of outdoor areas that developments need to incorporate and Policy DM31: Surface Water Management – underlines the importance of incorporating the most sustainable drainage option available for new development. Policy DM35: Biodiversity - covers all the minimum expectations in relation to wildlife matters, including habitat creation where opportunities exist.

## Policy MM1 Building Design

The design of proposals for new development will be supported provided that:

- a. the provisions set out in the Marton Moss Design Code are appropriately reflected in the submitted scheme; and,
- b. consistent with the Code, schemes would minimise their impact on the appearance of the wider area through retaining existing trees and hedgerows, providing appropriate landscaping, and garden layouts; and,
- c. a Sustainable Drainage System compliant with the most up to date requirements of CIRIA \* Manual 753, or any future replacement thereof, is to be installed with suitable arrangements to be put in place for its future maintenance and proposals for this system to outfall to a fully functioning and intact local dyke network, subject to advice on sustainable drainage and flood risk in the [National Planning Practice Guidance](#); and
- d. there is a commitment to provide nature conservation information packs to new residential development occupiers, and to wildlife habitat creation within the site as set out in the Marton Moss Biodiversity Strategy; and
- e. in respect of land with high archaeological potential, that aspect has been fully assessed and there is a commitment to take appropriate action to protect and record features of importance.

\* Construction Industry Research and Information Association



*Primrose Terrace, School Road*



## 5.2 Open Land Character – To safeguard significant open land from being inappropriately developed and secure environmental improvements

### *Background Justification*

67. The defining visual feature of Marton Moss is its open pastoral character. The generally low density of development with numerous areas of open land gives the place a rural feel. The Plan aims to preserve this important characteristic whilst at the same time allowing some appropriate development to take place. The Marton Moss Design Code recognises the importance of four large open tracts of land and the significance of these areas are considered in more depth in the Marton Moss Major Open Land Study. The four tracts are:

- Between Chapel Road and Yeadon Way
- South of Ecclesgate Road
- East of Sandy Lane and Worthington Road
- Midgeland Farm

68. These tracts are well spread across the Moss; they are longstanding areas of open land little used in the past for intensive market gardening and are now more typically fields for cattle and horse grazing. The Midgeland Farm site is the only one bordering the wide, open countryside of the Fylde Plain beyond, but it has specific heritage significance and community re-use potential - matters that are considered separately under Policy MM8.

69. The three other Major Open Land areas represent enclaves of countryside that the strict Core Strategy CS26 Policy has helped keep undeveloped. They serve as 'Green Lungs' and being open to view from nearby roads and/or public rights of way, overtly contribute to the open feel of the Neighbourhood Area. The land at Chapel Road/Yeadon Way also serves as a buffer between the Moss and the more built-up area of Blackpool further north. To the south, the open land tracts at Ecclesgate Road and Sandy Lane/Worthington Road are embedded in the heart of the Moss. All three areas have the potential to offer better public access with path improvements.

70. Furthermore, Blackpool Council's open space and green infrastructure mapping evidence shows how these areas of Major Open Land connect with other open areas on the Moss. As such they serve as a linked network of spaces that not only benefit the human population but also serve as natural habitats and wildlife corridors of ecological importance, albeit with the potential to be more biodiverse. As in many places of human settlement and agricultural use the surviving extents of natural vegetation are remnants of once larger habitats and these tracts of land represent local nature recovery opportunities. It is therefore appropriate that as much as possible of the open land should be retained and appropriately used not just to safeguard the local character but also for recreation, open-air leisure pursuits such as equestrian events and golf, and nature conservation benefits. Any buildings proposed on such land will need to be kept to a minimum and limited to those essential to the intended predominantly open use envisaged. Camping tourist accommodation comprising tent and touring caravan sites would also be acceptable within areas of Major Open Land.

### *What the Community Says*

71. The open pastoral character of the Moss is seen as its attractive defining feature by many local people. The Residents' Survey showed that the greatest concerns were the loss of green space arising from new development and protecting the natural environment.

72. The majority of responses received to the Evidence and Policy Options Engagement supported the safeguarding of specific key larger tracts of open land from development. However, it was also pointed out that as well as the large open tracts there are also areas of significant open land comprising smaller open spaces interspersed within the more built-up areas of the Moss that also contribute to its overall character.

### *Sources of Evidence*

Historic Characterisation of Marton Moss, 2009

Marton Moss Conservation Area Appraisal, 2018

Blackpool's Green and Blue Infrastructure Strategy 2019-2029, 2019

Marton Moss Design Code, 2020

Marton Moss Major Open Land Study, 2022 (Further Revised)

Marton Moss Footpaths, Bridleways and Cycle Routes Study, 2022 (Revised)

M55 Hub Extended Phase 1 Ecology Report, 2009 and miscellaneous nature conservation records, various

Marton Moss Biodiversity Strategy, 2022

Habitats Regulations Assessment: Marton Moss Neighbourhood Plan, 2022

### *National Planning Policy and Advice*

73. Although making effective use of land (when it is being developed) is a central feature of national planning policy that approach does also recognise the benefits of keeping land undeveloped. Such open land can serve a variety of functions (e.g. for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage, food production) and in terms of maintaining an area's character and setting. Achieving biodiversity net gain is also a fundamental requirement of new development proposals.

### *Relevant Local Plan Policies*

74. Local Plan Part 1 Core Strategy Policy CS1: Strategic Location of Development point 3 refers to recognising the important character of land at Marton Moss. Policy CS6: Green Infrastructure - promotes protecting, enhancing, creating and connecting all the facets of the green infrastructure network. Policy CS7: Quality of Design - recognises the importance of green infrastructure in the overall design of places. Policy CS21: Leisure and Business Tourism – aims to focus tourism investment in central parts of Blackpool and at existing outdoor leisure and tourism facilities elsewhere, only exceptionally will new holiday accommodation be allowed in peripheral locations outside these areas. Part 2 of the Local Plan in Policy DM35: Biodiversity - covers all the minimum expectations in relation to wildlife matters, including habitat creation where opportunities exist.

### **Policy MM2 Open Land Character**

**To maintain their vital contribution to the overall character of Marton Moss and their green infrastructure significance the following areas, as shown on the Policies Map, are safeguarded as Major Open Land:**

- 1. Between Chapel Road and Yeadon Way**
- 2. South of Ecclesgate Road**
- 3. East of Sandy Lane and Worthington Road**

**Development proposals on Major Open Land will be supported provided that the open appearance of the site would be substantially retained, and limited to the following:**

- a. outdoor recreational, camping or other open-air leisure uses appropriate to a rural area, provided any buildings are demonstrated to be essential and no larger than is necessary to serve the use proposed; or,**
- b. conversion or change of use of existing buildings for agricultural or equestrian purposes; or,**
- c. extensions or replacement dwellings in keeping with the scale and character of the area and not exceeding 33% of the original ground floor footprint of the existing dwelling.**

**Where appropriate schemes should provide better public access and encompass local nature recovery measures.**

## 5.3 School Road/Midgeland Road Junction – To improve the roadside appearance and retain the open character of the land here

### *Background Justification*

75. The appearance of an entrance to a place has a significant impact on informing first impressions on users of what that place is like. The School Road/Midgeland Road crossroads serves as a gateway for people arriving at Marton Moss. Unfortunately, the land around this crossroads has a poor appearance. There is an unkempt former bus turnaround/layby, underused and disused land at each quadrant and unsightly, dilapidated fences. There are opportunities to enhance the location in various ways in addition to better maintenance of the public spaces.

76. Despite its poor appearance the land around the junction, given its significant extent and absence of buildings, positively contributes to the open character of the Area therefore any development would need to be in accordance with the provisions of Policy MM2. Any development land use proposals that come forward will need to provide appropriate boundary treatment to the road frontage. Normally a proposal to put up a wall or fence up to 1 metre high would not require planning permission to be applied for and therefore the Council would not be able to control the design and materials to be used. However, it is intended that this 'right' be removed with an Article 4 Direction under the provisions of the General Permitted Development Order.

77. The former bus turnaround/layby is next to the Midgeland Farm site (see Policy MM9) and has the potential to be a point of access thereto for pedestrians, horse riders and cyclists. There is also sufficient space here capable of accommodating a sizeable public art installation, such a feature could also serve to signpost the way to the proposed community park at Midgeland Farm.

### *What the Community says*

78. There was very high level of support from respondents to Evidence and Policy Options Engagement for improving the appearance of this road junction.

### *Sources of Evidence*

79. Visual survey of land use and its condition at Marton Moss (no published documents).

### *National Planning Policy and Advice*

80. National Planning Policy urges that plan makers and decisions on planning applications take account of the sense of place, arrangement of streets, spaces, building type and materials to create attractive, welcoming, and distinctive places to live, work and visit.

### *Relevant Local Plan Policies*

81. Local Plan Part 2 Policy DM25: Public Art – outlines the Council's approach to encouraging appropriate public art installations and specifically mentions Marton Moss as a location opportunity.

### Policy MM3 School Road/Midgeland Road Junction

The design of any proposal for development on land adjacent to the School Road/Midgeland Road crossroads, as shown on the Policies Map, will be supported provided it:

- a. is in accordance with Policy MM2; and,
- b. includes appropriately designed boundary treatment adjacent to the road frontage.

An appropriately designed and sited art installation will be supported at this location.



*Land at School Road/Midgeland Road Junction*

## B. Housing Development

### 5.4 Housing Site Allocations – To identify land for new housing and guide the number, sizes, and types of new homes on each site

#### *Background Justification*

82. People have changing residential accommodation requirements and abilities to afford housing as they go through their lives. Wherever possible it is clearly important that households occupy accommodation that best suits their current and foreseeable short-term needs. Housing comes in various basic sizes (numbers of bedrooms) and types – houses, bungalows, and apartments. There are also more specialist forms designed to suit less able and/or older persons in terms of their accessibility and care needs. There are also several different forms of tenure – homes to buy, rent, or some combination of the two in terms of shared ownership.

83. Housing specifically intended to be affordable is cheaper to buy or rent than the market rate so in some way it is subsidised (see Appendix G). Generally, most housing is constructed ahead of the future occupiers being known (i.e. it is speculatively built) but many individual homes are provided to the specific requirements of the initial purchaser – i.e. they are custom-built.

84. A Housing Needs Assessment of the population of the Moss has been prepared to inform this Plan. This identifies both the overall quantity of additional housing indicated for the 10-year Plan period (broadly derived from the projected increase in the total number of households), and what different forms of housing would best meet the needs of local people over this time frame. However, the scope to provide everyone in the Area with ideal types of newly built accommodation is limited by the relatively small overall number of additional homes indicated – 28 dwellings to be provided between 2020 and 2030. This is a minimum figure that can be modestly exceeded without detriment to the integrity of the Plan.

85. The theoretical total amount of new housing indicated to meet the needs of Marton Moss over the 10-year Plan period is a complicated calculation (see Appendix H). The Neighbourhood Plan needs to be in general conformity with the strategic policies of the Local Plan and as such should aim to meet its share of the overall Blackpool housing requirement figure. That share is approximately 1% based on the size of the population of the Moss. However, the Local Plan Part 1 Core Strategy has a plan period of 2012-2027. It therefore finishes three years short of the Neighbourhood Plan's period. However, having said all this as the whole amount of housing required to meet Blackpool's needs can be met in the Borough outside of Marton Moss, the 28 dwelling figure is only an indicator.

86. The Marton Moss Housing Needs Assessment work takes account of both the Core Strategy approach and the Standard Method. So, although the amount of new housing in the Area will be relatively small it needs to be remembered that most people find and move to locally available 'secondhand' housing as their accommodation needs and financial circumstances change. However, people with more specific requirements may not be able to do so through a lack of choice in the existing housing stock.

87. The overall housing indicative figure is less than the estimated total number of homes specially designed for older people ideally needed over the coming 10 years. There is very little existing housing within or near Marton Moss designed for the needs of older people. This is common in many communities but in practice many older people prefer to stay living in accommodation they brought their families up in and manage to cope with health limiting impairments with the assistance of home adaptations and visiting carers. However, a 12- bungalow development is already under construction on the former Baguley's Garden Centre site at Midgeland Road and this could be appropriately extended with a few more bungalows using adjoining land proposed for such in the Plan. Occupation of the permitted bungalows and the additional properties will be restricted to older people for which they are designed to suit.

88. The Housing Needs Assessment also identifies a need for at least 20 affordable (cheaper than market) homes over the coming 10 years. Again, there is very little subsidised existing housing on the Moss and the prospect of funding being available for future provision is limited. Affordable housing is provided in one of two ways – either through cross-subsidy from market housing developments or via grant funded housing association/council schemes. The low number of new market homes envisaged to be built in the Neighbourhood Area means the scope to cross-subsidise affordable housing is very small as is the prospect of grant finance being available with the limited funds available to public sector landlords and the pressing needs for affordable elsewhere in the Borough.

89. However, terraced housing can provide a cheaper form of accommodation than most properties on the market locally and such dwellings are likely to well meet the needs of newly forming younger households. Again, the Plan is bringing forward sites that can be developed for this type of housing. So, by allocating sites for residential development suited to providing a range of different forms of housing and promoting such choices through an appropriate policy a varied selection of new accommodation can be achieved across the Area.

90. The Neighbourhood Plan period started on 1 April 2020 and will run until 31 March 2030. All homes that are completed (built and ready for occupation) during that period will count towards the housing indication figure no matter what source they come from, including:

- Sites already with planning permission with homes remaining to be completed
- New sites identified (i.e. allocated) for housing
- Unidentified (i.e. windfall) sites that come forward and gain planning permission during the Plan period

91. This means that the twelve bungalows being built at the former Baguley's Garden Centre site will, when completed, count towards the housing indication figure. It should be noted that the Local Plan Part 2 is not proposing any housing allocations at Marton Moss.

92. In deciding what land to propose as housing allocations (in Policy MM4 below) account has been taken of the site suggestions made by local people, landowners, and developers in the Call for Sites. These sites have been analysed for their suitability in the Marton Moss Site Options and Assessment and those found 'suitable' or 'potentially suitable' have been considered in more detail in the Marton Moss Housing Site Allocations Appraisal 2022. The potential financial viability of housing development in the Area has also been considered in two documents.

### *What the Community Says*

93. Housing overall was not rated as the most important issue for local people responding to the Residents' Survey. That is probably because most of the local population have their housing needs appropriately met. However, several people commented on the need for new individual houses, and some recognised a requirement for 'starter homes', properties for younger households. However, when asked in the Survey what sizes of new housing developments they would prefer to see built, local people responded as follows:

Large development (more than 30 houses)	1%
Medium development (15-30 houses)	6%
Smaller development (2-14 houses)	31%
Individual houses	35%
None	24%

Note: The above figures do not add to 100% due to rounding

94. At the Evidence and Policy Options Engagement stage the vast majority of people commenting favoured the Plan allocating sites for residential development and most respondents supported a specific policy which would specify in advance the sizes and types of homes that would suit each allocated site rather than leaving this open until the planning application stage.

### *Sources of Evidence*

Marton Moss Housing Needs Assessment, 2020

Marton Moss Site Options and Assessment, 2020<sup>6</sup>

Marton Moss Housing Site Allocations Appraisal, 2022 (Revised)

Marton Moss Housing Site Viability Study, 2022

Marton Moss Housing Viability – a Local Commentary, 2022 (Revised)

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<sup>6</sup> The site reference numbers used by the authors of this report (consultants AECOM) are shown in Policy MM4 overleaf alongside the lettering of the allocation sites.

### *National Planning Policy and Advice*

95. A long-standing Government policy is to significantly boost the overall supply of new homes across the country. Neighbourhood Plans are not required to bring forward land for housing development but are encouraged to do so. National policy advises neighbourhood planning groups should consider the opportunities for allocating suitable small and medium sized sites taking account of local market conditions and viability, availability and capacity of infrastructure and services, maintaining an area's prevailing character and setting, as well as the importance of securing well-designed, attractive and healthy places. Where there is a shortage of land to meet housing needs low density development should be avoided – note there is no shortage at Marton Moss but in any event the Neighbourhood Plan makes provision for housing well in excess of the housing indicator.

96. National policy states that Plans should reflect in their policies the different residential accommodation requirements of different groups in the community. Also, the specific need for affordable housing is acknowledged but national policy states this is normally not to be sought on market housing schemes of less than ten dwellings. Above this size at least 10% of homes to be provided on a site should be for affordable home ownership (unless this would prejudice the ability to meet the identified affordable housing needs of specific groups). Also at least a quarter of the affordable homes on a site should be 'First Homes' (see Appendix G). The exceptions to this are developments that are solely 'Build for Rent' schemes, specialist accommodation such as for elderly or student accommodation, self or custom-built housing, and schemes exclusively for affordable housing.

### *Relevant Local Plan Policies*

97. Local Plan Part 1 Core Strategy Policy CS2: Housing Provision - sets out an overall housing requirement figure for the whole of Blackpool for the 2012-2027 Plan period of 4,200 homes. The following policies also apply to the whole of the Borough including Marton Moss: Policy CS13: Housing Mix, Density and Standards – specifies the sizes of homes on sites so as to achieve a balanced mix of properties and Policy CS14: Affordable Housing – seeks on sites in the 3-14 dwelling size range, the direct provision of such housing, or a financial contribution to be used on another site. On larger sites thirty percent of the total number of units provided are required to be affordable. These provisions are all subject to the financial viability of the overall scheme.

98. The various requirements for new developments to contribute to infrastructure and community facilities are Policy CS11: Planning Obligations, Policy CS12 Sustainable Neighbourhoods and, specifically school places, in Policy CS15: Health and Education. Local Plan Part 2 Policy DM3: Supported Accommodation and Housing for Older People – sets out criteria for the various forms of specialist housing for older people and the acceptable distribution of such developments.



## Policy MM4 Housing Site Allocations

The following sites, as shown on the Policies Map, are proposed for housing development:

Site	AECOM	Location	Appropriate forms of development
B	MM19	Adj. to 322, Common Edge Road	4 detached dwellings facing Common Edge Road
C*	MM26 (part)	Land on the Corner of Common Edge Road and School Road	No more than 11 dwellings
D~	MM20	Adj. to Ral Mar, Sandy Lane	2 detached dwellings
E~	MM27	Adj. to Lemmington House, Worthington Road	1 detached dwelling
F	MM21	The Bungalow Nurseries, Worthington Road	1 detached dwelling
G	MM18	Corner of Midgeland Road and Kitty Lane	No more than 8 dwellings
H	MM13	Caradaw Farm, School Road	No more than 6 dwellings
I	MM22	Adj. to Rushy Meade, School Road	1 detached dwelling fronting School Road
J	MM23	Adj. to Larchfield, St. Nicholas Road	2 detached dwellings
L	MM24	Adj. to 9 Fishers Lane	2 detached dwellings
N	MM16	Former Marina Nurs, New Hall Avenue	2 detached dwellings
O	MM17b	Remaining land at former Baguley's Garden Centre, off Midgeland Road	5 detached bungalows, reserved for older people, accessed off new estate road
P~	MM14b	Dean Nurseries, Chapel Road	6 detached dwellings off new estate road
Q~	MM14a	The Hollies, Chapel Road	1 detached dwelling
R^	MM10	Adj. to 1 Runnell Villas, Chapel Road	2 detached dwellings off short private drive fronting Chapel Road
S^	MM5	Off Magnolia Way	10 detached dwellings and 5 terraced houses accessed off Magnolia Way
T	MM31	Adj. to Moss Lodge, Jubilee Lane North	3 detached dwellings fronting Jubilee Lane – avoiding surface water sewer
U	MM30	Adj. to 58 Stockydale Road	2 detached dwellings fronting Jubilee Lane – avoiding surface water sewer
V	-	Grazing Land, Jubilee Lane North	1 detached dwelling
W''	-	41 Stockydale Road	2 detached dwellings - avoiding surface water sewer
X	-	Amarella, School Road	1 detached dwelling fronting School Road and 3 detached dwellings fronting Kitty Lane/Sandy Lane

\*Plus subsequent site suggestion. ~Site within the vicinity of a sewer flooding incident – prospective developers advised to engage early with United Utilities. "Subject to demonstrating there would be no amenity impact of the nearby pumping station on any proposed development of the site. ^ Site with high archaeological potential – see Policy MM1

## 5.5 Windfall Housing – To allow unallocated sites to be developed for housing

### *Background Justification*

99. It is not feasible at the start of the Plan period to identify all suitable sites that may become available for housing in the years up to 2030 and allocate them in advance. Inevitably over time circumstances will change, some long standing uses will cease, and landowners will revise their future intentions. Therefore, it is appropriate to have a policy to cover how unidentified sites will be treated if they come forward as ‘windfall’ opportunities in planning applications for residential development.

100. The key consideration is to ensure that these sites are no less appropriate for development than the sites allocated for housing. The over-riding requirement will be for windfall housing schemes to not significantly undermine the open character of the Area. Large scale development of greenfield land would be unacceptable and contrary to the Marton Moss Design Code. Housing schemes comprising small scale infilling of gaps in built-up street frontages or the redevelopment of previously developed ‘brownfield’ sites are much less likely to have a detrimental impact on the appearance of the Moss.

101. All windfall housing proposals, to be acceptable, must accord with the basic standard construction requirements (as set out in the Local Plan and other relevant documents) that are applicable to all developments and be appropriate in terms of all the relevant policies of this Plan and the Design Code, such as in terms of building densities. Proposals that seek to cram in new dwellings on vacant plots or in existing gardens would therefore not be acceptable. Schemes that aim to meet specific local housing needs (such as to provide cheaper accommodation or specially to suit older persons) will though be favoured provided they are appropriate in all other respects.

### *What the Community Says*

102. A common comment made by respondents to the Residents’ Survey was that local people should be allowed to build an additional home on their land. This opportunity has been denied under Local Plan Part 1 Core Strategy Policy CS26 and this probably means there is a pent-up demand for such developments.

103. At the Evidence and Policy Options engagement stage of the Neighbourhood Plan a substantial majority of respondents favoured a policy that would limit windfall housing schemes to small infill and/or brownfield sites, rather than a policy that would cover a greater variety of types and sizes of site.

### *Sources of Evidence*

Visual survey of land use on the Moss

Marton Moss Major Open Land Study, 2022 (Further Revised)

### *National Planning Policy and Advice*

104. National policy recognises the contribution windfall sites can make to help meet housing requirements but cautions that there should be compelling evidence that this will be a reliable source of supply in the future if there is reliance on this source of provision to help meet the housing requirement figure. National policy also says that Plans should consider the case for policies that would resist development of residential gardens, such as where schemes would cause harm to the local area.

### *Relevant Local Plan Policies*

105. Local Plan Part 1 Core Strategy Policy CS2: Housing Provision - recognises the contribution to overall housing provision that can be made by windfall sites.

106. Local Plan Part 2 Policy DM2: Residential Annexes refers to ancillary living accommodation proposed as additional to the main dwelling, such proposals will be restricted in accordance with their occupancy and whether the development would create a separate dwelling.

### **Policy MM5 Windfall Housing**

**Housing development proposed on land not allocated for such purposes will be supported provided the site comprises either:**

- a. a small gap in an otherwise built-up street frontage; or,**
- b. land currently or recently occupied by buildings,**

**and the scheme would not significantly reduce the open character of the immediate locality or undermine the intentions of Policy MM2.**

**Subject to these provisions, proposals that would help meet a specific locally identified housing need will be favoured.**



Fishers Lane

## C. Horticultural and Equestrian Uses

### 5.6 Market Gardening Businesses – To support where possible horticultural businesses and guide future alternative uses

#### *Background Justification*

107. Widespread market gardening across much of the Moss has left an important legacy in terms of the vernacular architecture of the older houses and the scale and form of many land plots. These aspects are picked up by Policy MM1. Unfortunately looking forward, the prospects for continued market gardening locally look slim with only one such use known to be currently in operation (producing bedding plants) and there is limited scope for the diversification of these enterprises. Many glasshouses have been removed over the last 60 years, some of those that remain are in a derelict condition and others stand intact but unused. However, given the rising concerns about climate change and the benefits of local food sourcing, the demand for and viability of greenhouse cultivation on the Moss may become more positive in the future.

108. Given the historic contribution market gardening has made to the character of the area and to local employment, efforts to support the remaining businesses are justified. Glasshouses though have limited alternative uses and various activities ancillary to horticulture such as farm shops or pick-your-own outlets would not require planning permission to be applied for. However, novel proposals may arise that would constitute a change of use of a glasshouse or necessitate minor building works that would require planning approval.

109. Such proposals will be supported provided they are acceptable in all other respects including in terms of traffic generation and disturbance to neighbouring property, as would similarly appropriate redevelopment schemes where the scale and form of the horticultural plot is respected and the design requirements of Policy MM1 are met.

110. Strategic Environmental Assessment Draft Environmental Report for the Neighbourhood Plan makes the following specific recommendation relevant to proposals on former horticultural sites that have been left to go ‘wild’ for several years:

- that Policy MM6 include a requirement for an ecological survey of the site(s) considered for re-development to avoid potential harm to established biodiversity on such sites.

#### *What the Community Says*

111. Market gardening uses, and their employment benefits, were not specifically referred to in responses to the Residents’ Survey, probably because very few people are now directly employed in these businesses.

112. At the Evidence and Policy Options engagement stage a substantial majority of respondents favoured a policy that would encourage other suitable uses to help support the main enterprise.

#### *Sources of Evidence*

Visual survey of land use and its condition

Specific engagement with local market gardeners

Strategic Environmental Assessment: Marton Moss Neighbourhood Plan, Environmental Report, 2022

*National Planning Policy and Advice*

113. National policies recognise that the diversification of agricultural and other land-based rural businesses should be enabled but also that the role of town centres should be supported.

#### *Relevant Local Plan Policies*

114. Part 2 of the Local Plan does not have a specific policy concerning market garden uses although Policy DM34: Development in the Countryside - does recognise horticulture as being appropriate to a rural area. However, both Parts of the Local Plan (Policies CS4 and DM15 respectively) are relevant in terms of town centre uses.

#### **Policy MM6 Market Gardening Businesses**

**Proposals for development involving the re-use of an existing glasshouse and/or the diversification of an operating horticultural business will be supported providing that the proposed use:**

- a. can be appropriately accessed by delivery vehicles; and,**
- b. has sufficient vehicle parking provision within the site; and,**
- c. would not unduly disturb neighbouring residential occupiers.**

**Proposals to re-develop land previously used for market gardening will be required to respect the scale and form of the horticultural plot, accord with the design requirements of Policy MM1 and, where the land has been left to go wild, include an ecological survey of the site. Where the proposal is for a town centre use, it will need to comply with Blackpool Local Plan Policies CS4: Retail and Other Town Centre Uses; and DM15: Threshold for Impact Assessment.**



*Amatiello Nursery, New Hall Avenue*

## 5.7 Horse Stabling and Riding Activities – To support equestrian development

### *Background Justification*

115. The keeping and riding of horses is both an important local business sector and a popular hobby across the Moss. Many former market gardening plots are now used for the grazing, exercising, and stabling of horses. The use of land here for those activities has significantly helped retain the open and pastoral character of the Area. Some of these activities do not require planning permission to be applied for. However, others involve buildings of a significant scale that require consent. Policy MM2 recognises that equestrian development would be appropriate on the major tracts of open land as long as any buildings proposed (such as stables) here are essential, no larger than is necessary and are acceptable in terms of detailed siting considerations. Elsewhere across the Moss more substantial structures (such as for indoor riding) will be supported under Policy MM7 provided these are sited close to existing buildings. The Policy also points promoters of such schemes to the good practice produced by the British Horse Society<sup>7</sup> in respect of their recommended standards for structures and ground surfaces.

### *What the Community Says*

116. Horse riding is clearly a popular local activity and is seen as contributing to the appearance of the area but there is a concern at the loss of bridleway paths as mentioned in responses to the Residents' Survey.

117. At the Evidence and Policy Options engagement stage a substantial majority of respondents favoured a policy to openly support equestrian development.

### *Sources of Evidence*

118. Visual survey of land use and its condition at Marton Moss (no published documents).

### *National Planning Policy and Advice*

119. Equestrian uses are essentially rural in character, whether they be run as businesses or are personal leisure activities. National policies support the sustainable growth and expansion of such rural enterprises provided they respect the character of the area.

### *Relevant Local Plan Policies*

120. There are no Local Plan policies directly relevant to this topic.

### **Policy MM7 Horse Stabling and Riding Activities**

**Proposals for development involving equestrian use will be supported provided the buildings and any other installations proposed accord with:**

- a. British Horse Society good practice; and,**
- b. Policy MM2 where they relate to designated major open land; or elsewhere,**
- c. any substantial structures (such as indoor riding centres) are appropriately located adjacent to existing buildings.**

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<sup>7</sup> <https://www.bhs.org.uk/our-work>

## D. Heritage and Community

### 5.8 Midgeland Farm – To enable restoration and community use

#### *Background Justification*

121. There has been a 'Midgeland Farm' since at least the 16<sup>th</sup> century. The oldest buildings that remain today on the site, the farmhouse, stable, barn and two shippens date back to at least the early 19<sup>th</sup> century. These buildings have been disused for many years and are now in a very poor state of repair. However, the farmhouse is largely unaltered in plan form. The barn is almost entirely cobble built. These buildings are locally listed; later constructed farm buildings on the site are of little or no architectural merit, they are also in a poor state of repair.

122. After several private owners, Midgeland Farm (the buildings and associated fields) was bought by the former Blackpool Corporation in 1968 and the bulk of the land was used as a landfill site. Subsequently all the land and buildings became owned by Lancashire County Council.

123. Today the site remains closed to the public. All the buildings have recently been structurally surveyed and are now considered by the owners to be beyond economic repair, a high safety risk and should be demolished. Clearance of the buildings would release the potential of the northern field of the site at the south east corner of Midgeland Road and School Road (which has never been landfilled) for open space and tree planting uses at minimal cost.

124. The remaining land overlies the former landfill and is capped with a clay layer. This part of the site is interspersed with boreholes used for gas monitoring and water sampling. Gas wells and a flare are used to burn off methane gas emissions. Leachate (water that has percolated through a solid and leached out some of the constituents) is collected and pumped to the treatment plant where it is treated before being discharged in to the sewer. A recently completed risk assessment undertaken by the owners concludes that the landfill is still actively producing emissions and should remain closed to public access for the time being. United Utilities point out that there is a modelled flood risk for the site and ask to be consulted as more detailed re-use proposals are drawn up.

125. The land associated with the farmstead mainly comprises open fields with a few hedgerows. There are, however, substantial belts of trees on the south western and south eastern boundaries of the site. There is a good standard of vehicular access to the land directly from a full width stretch of Midgeland Road and an internal, surfaced roadway dating from the landfill operations. This access could feasibly be adapted to allow public access to the northern field. In recent times plans to plant more trees on the site were only partially implemented.

126. The area that has been land-filled at Midgeland Farm extends eastwards beyond the Blackpool Borough boundary (into Fylde) and hence outside the Neighbourhood Area. The extent of land within the Area is about 11 hectares (27 acres). The northern field equates to about half that area, so still a substantial size that could accommodate the first phase of a community park with sufficient space for a range of paths for various users - walkers, joggers, cyclists and horse riders and room for significant landscape planting. At present there are no public parks within the Neighbourhood Area and limited public rights of way paths in good condition. There is particularly a shortage of bridleways and off-road cycle paths.

127. The principle of opening-up the site for community use is supported by Lancashire County Council, provided the land is made safe for public access. Blackpool Civic Trust is particularly keen to save from loss and help restore the traditional farm buildings. Blackpool Council is considering taking a long lease on the land and the authority also supports community use. Progress can best be achieved by the two Councils, the Civic Trust and the Forum working together.

### *What the Community Says*

128. The future of Midgeland Farm is considered a high priority by many local people who responded to the Residents' Survey and were supportive of safeguarding heritage features and providing more leisure/recreation amenities in the area.

129. At the Evidence and Policy Options engagement stage all but one respondent agreed with the aim to save the main traditional buildings from being lost and to then pursue their restoration and re-use, including the creation of a community park on the surrounding land.

### *Sources of Evidence*

Midgeland Farm Historic Building Assessment, 2009

Historic Characterisation of Marton Moss, 2009

Marton Moss Conservation Area Appraisal, 2018

### *National Planning Policy and Advice*

130. National policies state that plans should be positive about the conservation and enjoyment of the historic environment including heritage assets most at risk of loss through neglect, decay and other threats. National policies encourage plan makers to provide for social, recreational, and cultural facilities. Access to high quality open spaces is recognised as providing opportunities for physical activity that is important for the health and well-being of communities.

### *Relevant Local Plan Policies*

131. Local Plan Part 1 Core Strategy Policy CS8: Heritage – supports proposals to retain, reuse or convert heritage assets whilst conserving or enhancing their significance. Design Policy CS7 promotes new pedestrian and cycle routes as well as the provision of green infrastructure. The latter is also supported by Policy CS6: Green Infrastructure. Policy CS15: Health and Education - advocates developments that encourage healthy and active lifestyles.

132. In Part 2 of the Local Plan Policy DM28: Non-Designated Heritage Assets – supports a presumption in favour of repairing and appropriate re-use of structures such as locally listed buildings. Policy DM36: Controlling Pollution and Contamination – stresses the importance of development proposals relating to contaminated land properly dealing with any risks through appropriate management and remediation measures.

### **Policy MM8 Midgeland Farm**

- a. The Midgeland Farm site, as shown on the Policies Map, is safeguarded for future use as a community park complete with paths for people to use on foot, cycle, or horse as well as appropriate tree planting and other landscaping; and,**
- b. measures to retain, as far as reasonably practical, the structure of the farmhouse, stable, barn and early shippens will be supported. Any loss will be mitigated by measures to preserve any remaining structures and/or programme of archaeological recording.**



## 5.9 Local Green Space – To protect land that is used for recreational purposes

### *Background Justification*

133. There is little land in the Neighbourhood Area that is freely open to public recreational use. The formal sports pitches off School Road, used by two local football clubs, provide good facilities to their members as does the South Shore Lawn Tennis Club on Midgeland Road. However, these sites are already protected from inappropriate development proposals by national policies and the Local Plan so do not require any further safeguarding in the Neighbourhood Plan.

134. The Marton Moss Local Green Space Study assesses all the potential candidate sites for designation as Local Green Space. There are some local ‘amenity greens’ mainly associated with housing developments that serve as landscape and drainage features rather than recreational spaces. The one recreational exception is a well-used area of informal open space popular with local people to the north of St Nicholas Primary School. A through public footpath links the land with School Road and Ecclesgate Road. There is also an informal path through to The Shovels public house carpark which provides access to Common Edge Road and as such this space is well located to serve local residents. The land is owned by Blackpool Council but is not formally designated in any way. It fully meets the criteria for being designated as Local Green Space.

### *What the Community Says*

135. Many people responding to the Residents’ Survey had concerns about the lack of open recreational facilities on the Moss. Some respondents specifically referred to the need to protect the open space land from development between School Road and Ecclesgate Road.

136. At the Evidence and Policy Options engagement stage there was over whelming support to have a Local Green Space policy. This was envisaged to apply to the sports grounds as well but following representations from Sport England it is accepted that these do not need such protection in the Neighbourhood Plan and are in any event shown as existing Green Infrastructure on the Local Plan Policies Map.

### *Sources of Evidence*

Blackpool’s Green and Blue Infrastructure Strategy 2019-2029, 2019

Marton Moss Local Green Space Study, 2022 (Revised)

### *National Planning Policy and Advice*

137. Designating Local Green Space is a task that national policy specifies for Neighbourhood Plans but states the designation should only be used where the green space is:

“

- a) *in reasonably close proximity to the community it serves*
- b) *demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational (including as a playing field), tranquility or richness of its wildlife;*  
*and*
- c) *local in character and is not an extensive tract.*

*Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”*

*Relevant Local Plan Policies*

138. Local Plan Part 1 Core Strategy Policy CS6: Green Infrastructure - refers to the wide-ranging benefits of protecting and improving open green space. However, there is no specific mention in any part of the Local Plan to the School Road /Ecclesgate Road land (which includes that North of St Nicholas School).

**Policy MM9 Local Green Space**

**Open land used for informal recreation immediately to the North of St Nicholas School, as shown on the Policies Map is designated as Local Green Space where development will be managed in accordance with national policy for Green Belts.**



*Open land immediately adjoining the northern boundary of St Nicholas School*

## *E. Movement*

### **5.10 Footpaths, Bridleways and Cycle Routes – To improve local opportunities for walking, horse riding and cycling**

#### *Background Justification*

139. Marton Moss has a quite extensive network of designated public rights of way. However, most of these are only classed as footpaths and several of them are difficult to use due to being blocked by overgrown vegetation or in some cases buildings. There are few paths purpose-designed for horse riding use (bridleways) and no dedicated cycleways or signed cycle routes.

140. Resolving the issue of blocked paths is first and foremost an enforcement matter for the Council, as Highway Authority. Creating new paths other than on land set aside for community use (such as those proposed at Midgeland Farm – Policy MM8) is difficult as it requires willing landowners. However, where there are related development proposals that could improve accessibility, developers will be expected to either improve existing paths or provide routes for new paths in places identified as missing gaps in the network – see Map 3 in Appendix I. Providing better and additional paths within the Moss would encourage more localised activity away from land linked with the sensitive and internationally important wildlife habitats associated with the Ribble Estuary. The land made available should be at least 2 metres wide so that a multi-use path can be provided.

141. Creating a network of cycle routes is beyond the scope of this Neighbourhood Plan as it requires the use of solely Highways Act powers. This matter is however covered in the Marton Moss Footpaths, Bridleways and Cycle Routes Study 2022 as revised, which includes a map (see Map 4 in Appendix I) showing a suggested route network that could be signed for cyclists; it uses less trafficked roads and existing bridleways. However, requiring relevant developments to provide cycle use connections to roads and bridleways is a legitimate use of planning powers.

#### *What the Community Says*

142. The Residents' Survey shows that many in the community are concerned at the condition and loss of public rights of way as well as the safety of using roadside pavement footways. Numerous people suggested there should be more off-road paths provided.

143. At the Evidence and Policy Options engagement stage there was over whelming support to enable more opportunities for walking, horse riding and cycling.

#### *Sources of Evidence*

Mapping records of the public rights of way network.

Marton Moss Footpaths, Bridleways and Cycle Routes Study 2022 (Revised)

Habitats Regulations Assessment: Marton Moss Neighbourhood Plan, 2022

#### *National Planning Policy and Advice*

144. National policy urges plan makers to identify opportunities to promote walking and cycling with policies that provide for high quality path networks. Planning policies and decisions on planning applications should protect and enhance public rights of way and be added to where appropriate.

#### *Relevant Local Plan Policies*

145. Local Plan Part 1 Core Strategy Policy CS5: Connectivity - puts emphasis on the need for a safe, enhanced, and extended network of well signed routes for pedestrians and cyclists to increase the number of these types of journeys. Policy CS27 reaffirms this in South Blackpool and Policy CS15 stresses the importance new development helping to enable the leading of healthy and active lifestyles. Policy CS6: Green Infrastructure - recognises the value of public rights of way in connecting-up open spaces.

#### **Policy MM10 Footpaths, Bridleways and Cycle Routes**

**Development proposals will, wherever feasible, be required to:**

- a. incorporate measures to improve accessibility to/off nearby existing off-road paths (including where these are currently blocked or obstructed); and,**
- b. take opportunities to create new multi-mode paths along routes that represent missing links provided they would not lead to increased access to land associated with internationally designated wildlife habitats.**



*Bridleway from Midgeland Road to Division Lane*

## 6. PLAN IMPLEMENTATION, MONITORING AND REVIEW

### Implementation

146. For the Neighbourhood Plan to be effective in managing development proposals coming forward for the Moss the policies need to achieve what they set out to do. Except for minor schemes classed as ‘permitted development’ such as small house extensions, most other development proposals will need planning permission. When finalised, the policies in the Plan will be used by Blackpool Council, and Planning Inspectors in appeals, to help decide whether planning permission should be granted or refused. However, for the policies to be truly effective they need to either lead to the approved schemes being built or the protected features fully safeguarded from harm. In other words, the policies are in those cases being properly implemented.

147. Most of the development proposals that the policies relate to in the Plan will be put forward by private developers or private individuals and be dependent on the schemes being financially viable. For private developers this means that the money to be made from selling the completed development needs to exceed the costs of provision (land and construction) and enable a reasonable profit to be made. For individuals building properties for their own use, they need to be able to afford all the costs involved.

148. Some of the policies in the Plan are, however, at least partially dependent on additional funding, to ensure they are implemented. The following policies fall into this category:

- *MM3 School Road/Midgeland Road Junction* – providing the public art here is likely to require grant funding.
- *MM8 Midgeland Farm* – the traditional buildings are now considered beyond economic repair and because they are unsafe, may need to be demolished. However that could represent an opportunity to retain at least part of the structure and greatly reduces the remaining finance needed to create a community park. The National Lottery Community Fund is a potential source of monies. Likewise, the Lancashire Environmental Fund (especially given the former landfill status of the site) and Government bodies such as Sport England may also be eligible sources of grant aid to help fund the community park proposal.

### Monitoring

149. As time goes on it is important to check at regular intervals whether each policy in the Plan is being implemented as intended. The Forum is committed to annually monitoring how planning application decisions are being made in terms of conforming to the provisions of the policies and whether approved developments are being built. These checks will particularly apply to the progress being made on new housing provision. An annual monitoring report will be produced and published.

### Plan Review

150. The Plan has an expected ‘life’ of 10 years, the period it plans for being 2020 to 2030. Before the end of that period the Forum will consider whether to review the Plan and replace it with a new one. However annual monitoring work may reveal that the Plan’s policies are not proving effective far sooner than that. Early in the Plan period this may be a short-term blip and as time goes on the policies may come to achieve their intentions. If after around 5 years into the Plan period monitoring shows consistent under-performance of at least some of the policies, the Forum will decide whether to carry out a review and proceed to alter the Plan at that stage.

# Appendices

## Appendix A - Core Strategy Policy CS26, Justification and Key Diagram Extract

### Policy CS26: Marton Moss

1. The character of the remaining lands at Marton Moss is integral to the local distinctiveness of Blackpool and as such is valued by the local community. A neighbourhood planning approach will be promoted for this area to develop neighbourhood policy which supports the retention and enhancement of the distinctive character, whilst identifying in what circumstances development including residential may be acceptable.
2. Prior to developing a local policy framework through the neighbourhood planning process development on the remaining lands of the Moss will be limited to:
  - a. Conversion or change of use of existing buildings for agricultural or horticultural purposes;
  - b. Outdoor recreational uses appropriate to a rural area;
  - c. New homes that meet the requirements of NPPF paragraph 55;
  - d. Extensions or replacement dwellings in keeping with the scale and character of the area and not exceeding 35% of the original ground floor footprint of the existing dwelling.

### The justification text from the Core Strategy that further explains this Policy reads:

*8.23 The distinctive character of the Moss reflects its historic past and its importance in more recent times as a market gardening area. Alongside remaining glasshouses, the lands are now used for a mix of horse grazing, other animal welfare, garden centres and dwellings set in large gardens, with other land in need of enhancement. The Moss lands are criss-crossed by lanes and tracks with scattered dwellings and small businesses. While more development exists along the main highway frontages, the lands behind these frontages retain an essentially rural character, although very different from typical more open countryside.*

*8.24 Whilst there is support to safeguard the essentially green open nature of the Moss, at the same time there is the view that the Countryside Policy in the current Blackpool Local Plan (2006) is overly restrictive. Proposing a neighbourhood planning approach therefore provides the community with the opportunity to directly determine the future for their area improving the interest and value of the Moss lands. Policy CS26 does not propose any housing development on the remaining lands on the Moss unless this emerges through the neighbourhood planning process from the community, in which case it will be set out in a Neighbourhood Plan or a Site Allocations Development Plan Document.*

*8.25 In advance of the neighbourhood planning process, no development will be permitted in the area unless it accords with the criteria set out in part 2 of the policy. The provisions of part 2 essentially restrict development to agricultural or horticultural purposes or outdoor recreational uses appropriate to a rural area; and extension and replacement proposals to no greater than 35% of the original ground floor footprint of the existing dwelling. This restriction is proposed so as not to undermine the outcome of the neighbourhood planning process for the enhancement of the Moss.*

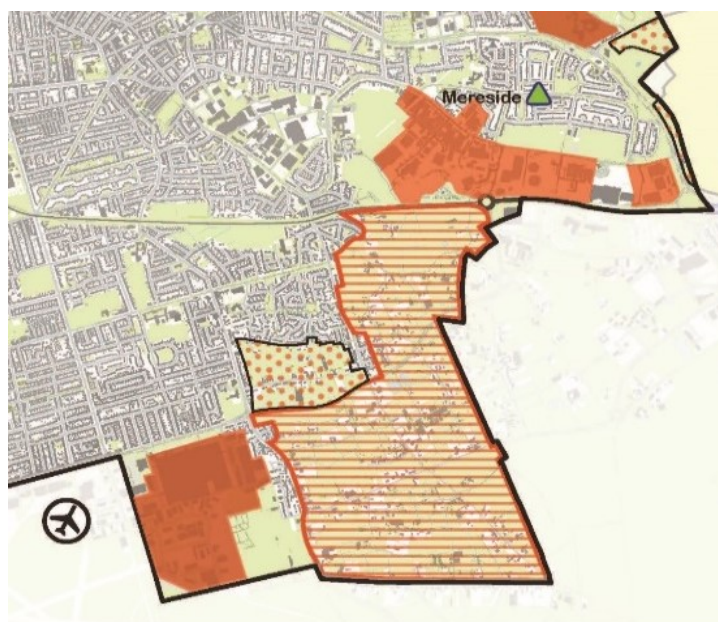
8.26 A comprehensive characterisation study and a Phase 1 Habitats Survey have been undertaken to inform the future approach on Marton Moss and the built and natural environment characteristics and features of the area that need to be considered in planning its future.

8.27 The survey highlights that while much of the area is a mix of residential/smallholdings use, particular areas of interest identified include marshy grassland and the dyke system, as well as the network of gardens, hedgerows, verges and associated habitats. There are some original buildings typical of the historic origins of the Moss, with a wide variety of building types and ages. Although there is no defining architectural style, it is this variety together with the hedgerows, trees and lanes which defines much of the Moss land character. Allotments and community gardens provide continuing opportunities to grow fruit and vegetables locally, as well as having clear benefits in terms of community cohesion, health, heritage and the environment.

8.28 The neighbourhood planning process will need to conserve and enhance the existing natural features and habitats. In particular, any future development must not have a significant impact upon the foraging/roosting habitat of any of the “Annex 1” listed bird species that visit ‘Natura 2000’ sites (Morecambe Bay and Ribble and Alt estuaries). A biodiversity strategy for Marton Moss will be required to ensure that consideration is given to biodiversity throughout the development process, including appropriate ecological surveys and mitigation measures. In addition, any proposals may require licensed mitigation in accordance with existing best practice and legislative requirements to protect wildlife.



8.29 Access to existing leisure facilities, such as the South Shore Lawn Tennis Club, Squires Gate and Blackpool Wren Rovers Football Clubs and the range of equestrian uses, remain important to the area. The enhancement of the Moss could provide improved local leisure and recreational opportunities whilst retaining the rural character in parts of the area. Beyond the existing lanes and tracks, public access into the open lands is currently limited and some development may also enhance recreational access and potentially improve the ecological value of the Moss.’

**Key Diagram extract:**



**Legend Extract:**

**South Blackpool Growth & Enhancement**

-  Marton Moss Strategic Site (Neighbourhood Planning Approach)
-  Employment Growth
-  Housing Growth

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## Appendix B - Purpose, Aims and Ambitions of the Forum

These were all set out in the Forum designation application:

### *Purpose*

The main purpose of the Marton Moss Neighbourhood Forum is to produce a Neighbourhood Plan for the Area. Ancillary to this is to establish an influential voice with the Council and other key agencies involved in providing local services and infrastructure.

### *Aims*

1. Plan for and enable appropriate development
2. Ensure such development is properly serviced with suitable infrastructure
3. Safeguard the character of the area, avoid significant harm to the local environment and where possible achieve improvements
4. Work with Blackpool Council to establish a Conservation Area
5. Improve local opportunities for walking, cycling and horse riding
6. Help provide needed community infrastructure and other amenities
7. Work with Blackpool Council to promote a high standard of greenspace maintenance
8. Work with Blackpool Council and the Police to help reduce the adverse impacts of road traffic on local routes
9. Work with United Utilities, Blackpool Council and landowners to secure drainage improvements and avoid any further deterioration

### *Ambitions*

1. Produce clear policies for managing new development that are understood and supported by local people
2. Deliver a community centre at Midgeland Farm working with other local groups
3. Provide public access to attractive green space at Midgeland Farm
4. Enable a convenient and safe off-road route through the Area for pedestrians, cyclists and horse riders
5. Ensure that the character of the Area remains unharmed and the Moss is an attractive place to live



## Appendix C - The Basic Conditions

(For details as to how this Plan meets these please refer to the separately produced Basic Conditions Statement)

All Neighbourhood Development Plans are required to meet the following Basic Conditions:

- a. **have regard to** national policies and advice contained in guidance issued by the Secretary of State – this means the relevant policies in the National Planning Policy Framework<sup>8</sup> and the pertinent advice contained in the Planning Practice Guidance<sup>9</sup>, also produced by the Government.
- b. **contribute to** the achievement of sustainable development - this is consistent with the planning principle that all plan-making and decision-making will either help achieve improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).
- c. **be in general conformity with** the strategic policies contained in the development plan for the area of the authority (or any part of that area) – for this Neighbourhood Plan this essentially means relevant policies in the Blackpool Local Plan Part 1 (Core Strategy). To assist neighbourhood planning groups with Plan preparation local planning authorities are obliged to identify which Local Plan policies are strategic. Those identified by Blackpool Council are set out on the following page in Appendix D.
- d. **does not breach, and is otherwise compatible with**, specific obligations and meets prescribed conditions – those relevant to a Neighbourhood Plan are those relating to Human Rights law, Strategic Environmental Assessment (SEA), the conservation of natural habitats and wild fauna (including wild birds) and flora (all considered in the Habitat Regulation Assessment (HRA) process) plus any aspects pertaining to the Waste Framework, Air Quality and Water Framework Directives. This Neighbourhood Plan has been subject to both a SEA and HRA.

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<sup>8</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>9</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

## Appendix D - Relevant Strategic Local Plan Policies

At the outset of preparing the Neighbourhood Plan Blackpool Council identified a list (see below) of Local Plan Part 1 - Core Strategy Policies – that may, dependent on the subsequently decided scope of the Neighbourhood Plan be relevant for it to be in general conformity with. Those policies which are considered by the Neighbourhood Forum to be relevant to the Neighbourhood Plan as now produced are shown in **bold type**. The separately published Basic Conditions Statement considers how the draft Neighbourhood Plan produced for the Regulation 16 stage meets the general conformity requirement.

**CS1: Strategic Location of Development (point 3)**

**CS2: Housing**

CS3: Economic Development and Employment

CS4: Retail and Other Town Centre (point 3 a-e)

**CS5: Connectivity**

**CS6: Green Infrastructure**

**CS7: Design**

**CS8: Heritage**

**CS9: Water Management**

CS10: Sustainable Design and Renewable and Low Carbon Energy

**CS11: Planning Obligations**

**CS12: Sustainable Neighbourhoods (point 1 a-f)**

**CS13: Housing Mix, Density and Standards**

**CS14: Affordable Housing**

**CS15: Health and Education**

CS16: Traveller Sites

**CS21: Leisure and Business Tourism (point 2)**

CS23: Managing Holiday Bed Spaces (point 2)

CS24: South Blackpool Employment Growth

**CS26: Marton Moss (will be superseded by the Neighbourhood Plan once adopted)**

**CS27: South Blackpool Transport and Connectivity**

## Appendix E - List of Evidence Documents

The following documents (in order of first citation) have been used to help inform the preparation of the Neighbourhood Plan:

- Census of Population, 2011, Office for National Statistics
- Indices of Deprivation, 2019, Office for National Statistics
- Historic Characterisation of Marton Moss, 2009, Archaeo-Environment
- Marton Moss Conservation Area Appraisal, 2018, Blackpool Council
- Marton Moss Design Code, 2020, AECOM
- Watercourse and flood risk mapping, latest published, Environment Agency/Gov.uk
- Blackpool's Green and Blue Infrastructure Strategy 2019-2029, 2019, Blackpool Council
- Marton Moss Major Open Land Study, 2022 (Further Revised), Envisionuk
- Marton Moss Footpaths, Bridleways and Cycle Routes Study, 2022 (Revised), Envisionuk
- M55 Hub Extended Phase 1 Ecology Report, 2009, Bowland Ecology
- Nature conservation records, various
- Marton Moss Housing Needs Assessment, 2020, AECOM
- Marton Moss Site Options and Assessment, 2020, AECOM
- Marton Moss Housing Site Allocations Appraisal, 2022 (Revised), Envisionuk
- Midgeland Farm Historic Building Assessment, 2009, Stephen Haigh
- Marton Moss Local Green Space Study, 2022 (Revised), Envisionuk
- Marton Moss Biodiversity Strategy, 2022, Envisionuk
- Habitats Regulations Assessment: Marton Moss Neighbourhood Plan, 2022, AECOM
- Strategic Environmental Assessment: Marton Moss Neighbourhood Plan, Environmental Report, 2022, AECOM
- Marton Moss Housing Site Viability Study, 2022, AECOM
- Marton Moss Housing Viability – a Local Commentary, 2022, (Revised) Envisionuk

## Appendix F - Statutory and Locally Listed Buildings

### Statutory

- Blowing Sands and attached wall, 166 Common Edge Road – Grade II
- 1 & 2 Fishers Lane – Grade II

### Local

- Runnell Farm, East Gate Avenue
- Runnell Cottage, Barn and associated cobble wall, Chapel Road
- Boundary Stone, near Trebarrons Garden Centre, Common Edge Road
- Werneth House, off Division Lane
- Butcher's Farm Cottage, Worthington Road
- Midgeland Farm (farmhouse, stable, barn and shippons), Midgeland Road
- St Nicholas School (original building), School Lane
- Railway Building, Lilac Farm, Whalley Lane
- Whalley Farm, Whalley Lane

## Appendix G – National Policy Definitions of Affordable Housing

### Taken from the National Planning Policy Framework

**Affordable housing:** housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

**a) Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

**b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

**c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.<sup>10</sup>

**d) Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

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<sup>10</sup> A further evolution of this category is ‘**First Homes**’ – discounted market sale units that are discounted a minimum of 30% against market value (and on their first sale priced no higher than £250,000 (£420,000 in Greater London) after discount), sold to first time buyers with a combined annual income not exceeding £80,000 (or £90,000 in Greater London), with restrictions on resales to maintain the discount proportion of the price of the property. First Homes are the government’s preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

## Appendix H - Housing Indicator Calculation

The following was provided to the Forum by Blackpool Council and is included in AECOM's Housing Needs Assessment report. **However please note since the below calculation was done the Forum has been informed by the Council that as there is no reliance on housing development in the Neighbourhood Area towards meeting Blackpool's overall housing requirements the housing number for Marton Moss is only an indicator and not a requirement.**

### **Core Strategy Housing Requirement**

*The Core Strategy requirement for the borough over the period 2020 – 2027 is 2,110 dwellings (280 dwellings per annum from 2020 – 2022 and 310 dwellings per annum from 2022 – 2027).*

*Assuming Marton Moss forms 1.16% of the population (borough population: 139,300, Marton Moss population 1,616) this would equate to **24 dwellings over the period 2020 – 2027.***

*Notwithstanding the above and as an observation. Applying the methodology to the whole of the plan period (2012 to 2027) the dwellings for Marton Moss would equate to approx. 49 dwellings. It should be noted that this does not take account of any completions that have already taken place at Marton Moss. There have been 83 completions at Runnell Farm, which is located in the Moss, as well as a small number of other completions elsewhere. This equates to more than 1.16% of the borough requirement over the entire Core Strategy period, so the Marton Moss area has already delivered more dwellings than would be required under a strict proportional approach.*

### **Standard Methodology (calculated as set out in PPG)**

*The Core Strategy requirement only runs for 7 years from 2020, which is three years short of a 10 year requirement. Therefore, the outstanding requirement has been calculated using the standard methodology. This provides **the minimum** number of dwellings needed for the 3 years 2027 to 2030.*

*Under the standard methodology the minimum local housing need figure for the borough per annum for the period 2020 – 2030 is calculated to be: 122 dwellings. Therefore, the minimum local housing need figure for the borough for 2027 – 2030 would be  $3 \times 122 = 366$  dwellings.*

*Assuming Marton Moss forms 1.16% of the population (borough population: 139,300, Marton Moss population 1,616) this would equate to **4** dwellings over the period 2027 – 2030.*

*Therefore, based upon the adopted Core Strategy requirement for the period 2020 – 2027 and the standard methodology minimum local housing need figure for the period 2027 – 2030 the housing requirement<sup>11</sup> for Marton Moss would be **28** dwellings (24 + 4) over the 10 year period 2020 – 2030.*

*The calculation used for the standard methodology is set out below:*

#### Step 1: Setting the baseline

*Baseline calculated using 2014 based household projections:*

- 64,165 households in 2020
- 65,338 households in 2030

*This is a total of 1,173 new households over the 10 year period, equivalent to an average household growth of **117** dwellings per year.*

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<sup>11</sup> It is considered more appropriate to refer to this as an 'indicator' as there is no requirement for Neighbourhood Plan to provide any housing contribution to meet the overall requirement for Blackpool.

### Step 2: An adjustment to take account of affordability

The average annual projected household growth figure is then adjusted based on the affordability of the area.

The most recent ONS published median workplace-based affordability ratio for Blackpool is **4.62** (2018)

No adjustment is applied where the ratio is 4 or below, but Blackpool's affordability ratio is higher than 4, so an adjustment is made using the formula in PPG.

**Local affordability ratio minus 4 :**  $4.62 - 4 = 0.62$

**This answer is divided by 4:**  $0.62/4 = 0.155$

**This answer is multiplied by 0.25:**  $0.155 \times 0.25 = 0.039$

**1 is then added to this answer:**  $0.039 + 1 = 1.039$

The adjustment factor is therefore 1.039 and is used as:

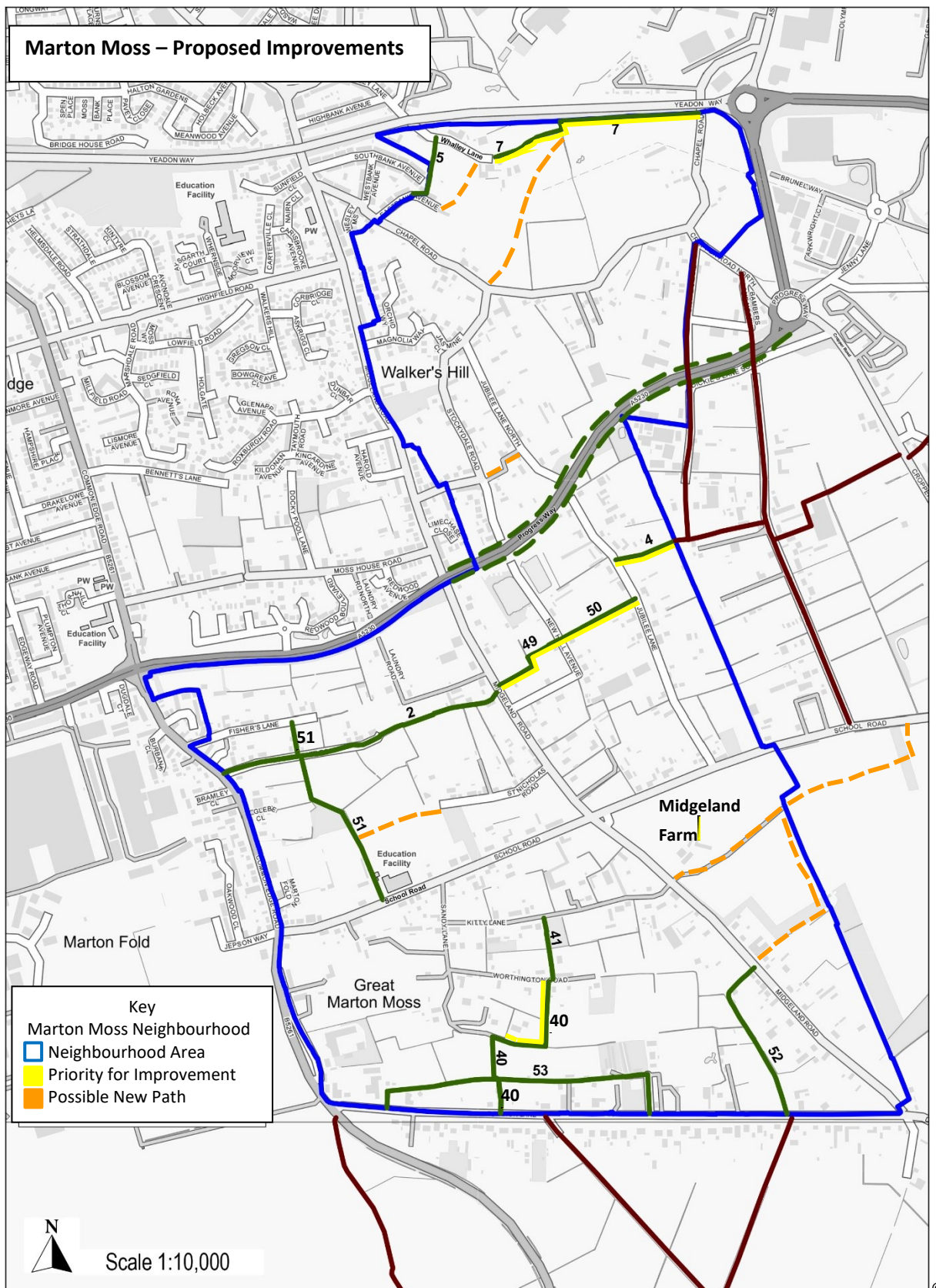
- Minimum annual local housing need figure = (adjustment factor) x projected household growth
- Minimum annual local housing need figure =  $1.039 \times 117$
- The resulting minimum local housing need figure is **122 dwellings per year**

### Step 3: Capping the level of any increase

A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing. Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure.

Blackpool strategic policies were adopted within the last 5 years (January 2016), but the minimum local housing need figure (**122 dwellings per year**) is **below** the Core Strategy average annual housing requirement figure, so **therefore the cap is not applicable**.

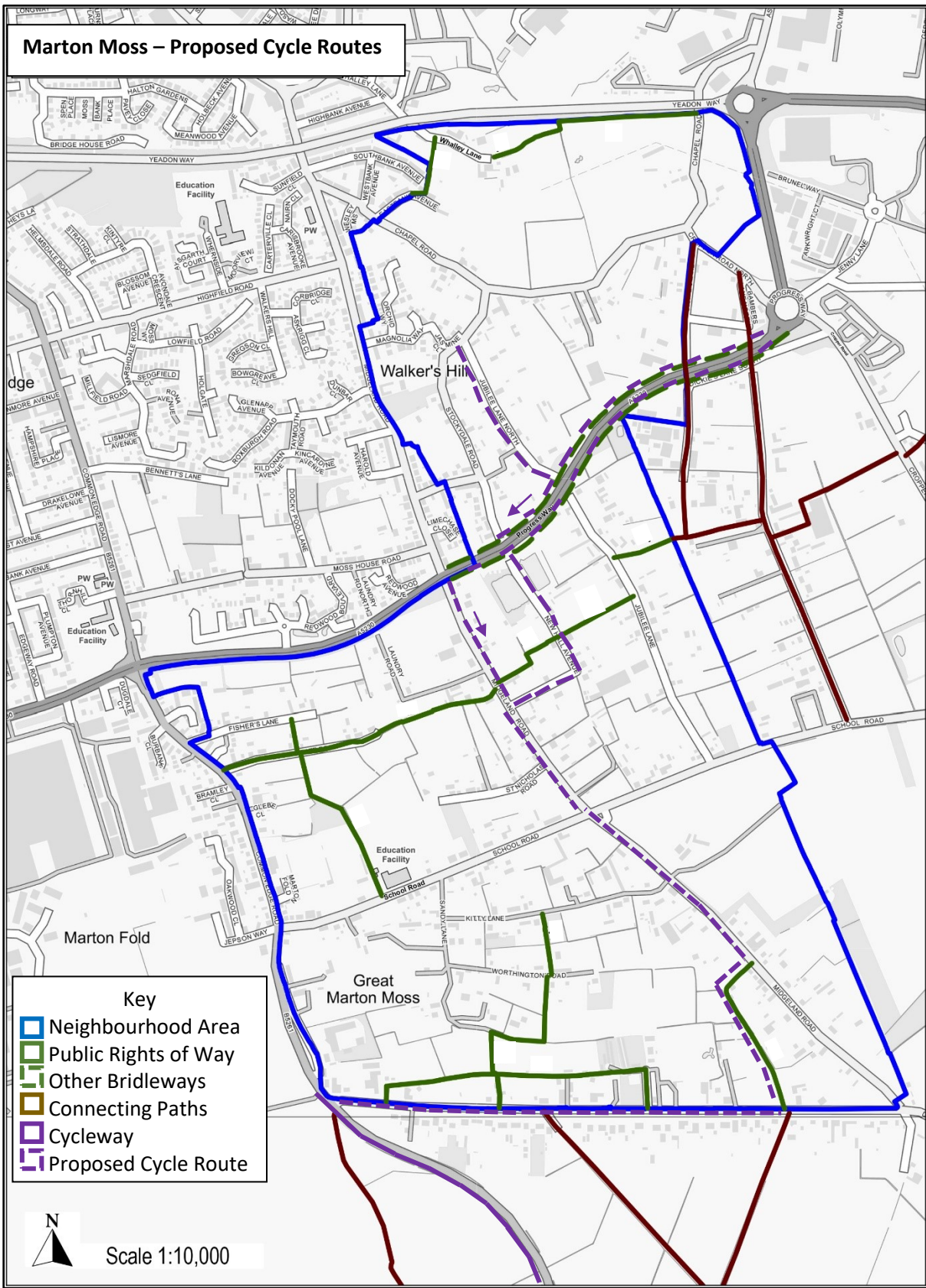
# Appendix I - Maps 3-4 of Footpaths, Bridleways and Cycle Routes Study Report



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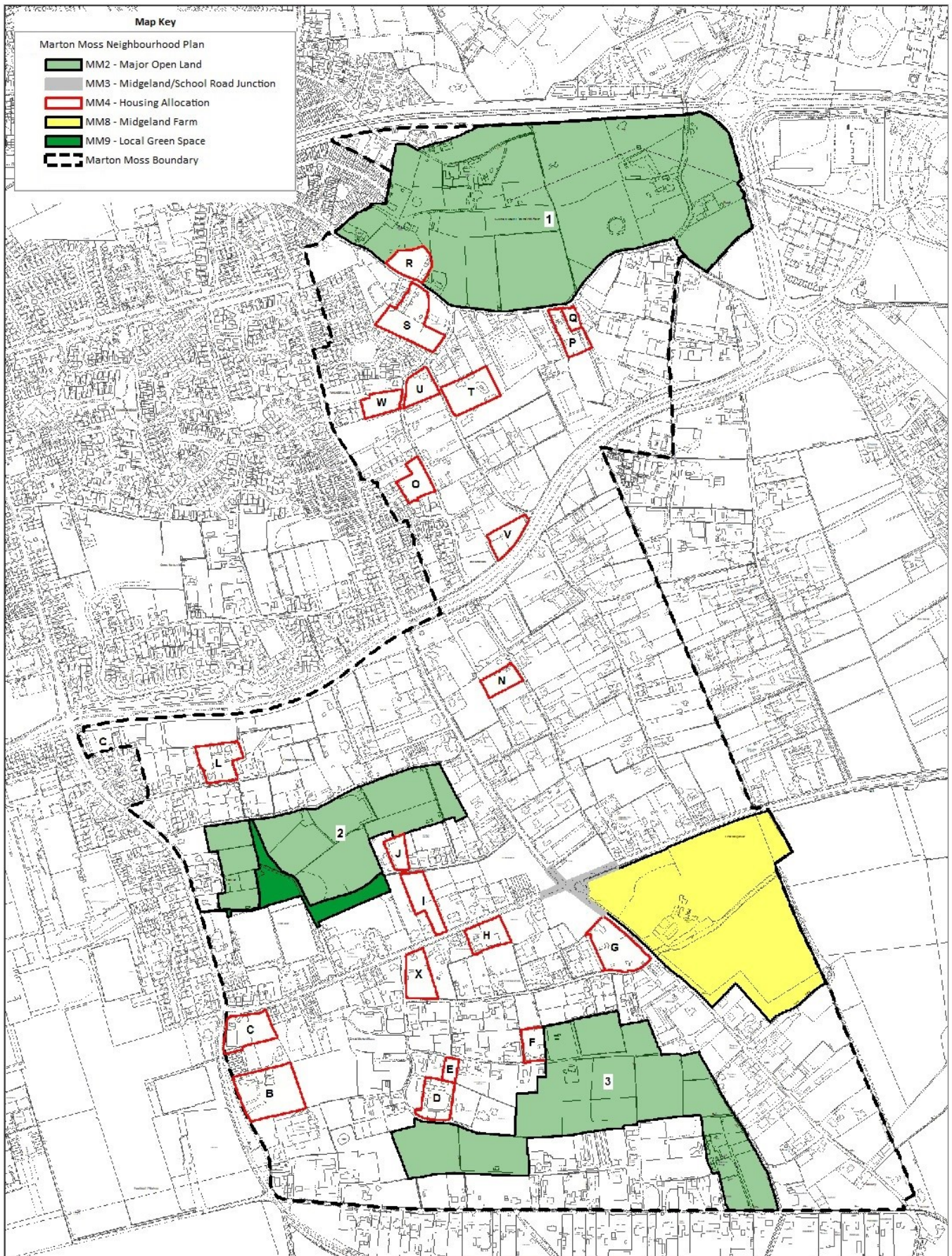
Map 3: Public Rights of Way proposed improvements and possible new paths





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Map 4: Proposed Cycle Routes



**Marton Moss**  
Neighbourhood Plan

**Policies Map**

Scale: 1:6500 @ A3

Date: 20/07/2022

Printed by: LDC

**Blackpool Council**

**Growth & Prosperity**

Team: Growth & Prosperity



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# **Report on the Marton Moss Neighbourhood Plan 2020 - 2030**

**An Examination undertaken for Blackpool Council with the support of  
Marton Moss Neighbourhood Forum on the August 2022 submission  
version of the Plan.**

Independent Examiner: Andrew Mead BSc (Hons) MRTPI MIQ

Date of Report: 29 March 2023

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## **Main Findings - Executive Summary**

From my examination of the Marton Moss Neighbourhood Plan (MMNP/the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the designated Marton Moss Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – the Marton Moss Neighbourhood Area as shown on page 7 of the Plan;
- The Plan specifies the period during which it is to take effect: 2020 - 2030; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### **Marton Moss Neighbourhood Plan 2020–2030**

- 1.1 The formal process to prepare a neighbourhood plan for Marton Moss began following the adoption of the Blackpool Local Plan Part 1: Core Strategy (BLP) in 2016. Policy CS26 of the BLP promotes a neighbourhood planning approach for Marton Moss in order to develop neighbourhood policy which supports the retention and enhancement of its distinctive character, whilst identifying in what circumstances development, including residential, may be acceptable. In March 2019, Blackpool Council (BC) designated the Marton Moss Neighbourhood Area (MMNA) and the Marton Moss Neighbourhood Forum (MMNF). The boundaries of the Plan area are identical to the spatial extent of Policy CS26 of the BLP.
- 1.2 The MMNA, extending over about two square kilometres, does not coincide with a statistical area of the 2011 Census, but a best estimate of its population would appear to be between 1,249 and 1,616.<sup>1</sup> The MMNA lies in the eastern part of Blackpool adjoining the western boundary of Fylde Borough, with Blackpool Airport nearby to the west. The flat landscape was previously the site of numerous market gardens. Redundant greenhouses are an occasional feature within the area, together with the patchwork of former gardens and detached houses. Following the

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<sup>1</sup> MMNP: paragraph 21.

preparation of the Plan by the MMNF, it was finally submitted to BC in August 2022.

### The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the MMNP by BC with the agreement of the MMNF.
- 1.4 I am a chartered town planner and former government Planning Inspector and have experience of examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the Plan.

### The Scope of the Examination

- 1.5 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
  - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;
    - it does not include provisions and policies for 'excluded development'; and

- it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
  - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
  - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').
- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### The Basic Conditions

- 1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan for the area;
  - be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>2</sup>; and
  - meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Plan does not breach the requirement of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>3</sup>

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<sup>2</sup> The existing body of environmental regulation is retained in UK law.

<sup>3</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.



## 2. Approach to the Examination

### Planning Policy Context

- 2.1 The current Development Plan for the MMNA, excluding policies relating to minerals and waste development, includes the Blackpool Local Plan Part 1: Core Strategy 2012 – 2027 (BLP Part 1) which was adopted in January 2016 and the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (BLP Part 2) which was adopted in February 2023.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published in July 2021 and all references in this report are to the July 2021 NPPF and its accompanying PPG.

### Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, as well as those submitted which include:
- the draft Marton Moss Neighbourhood Plan 2020–2030, dated August 2022;
  - the map on page 7 of the Plan which identifies the area to which the proposed Neighbourhood Plan relates;
  - the Consultation Statement, dated August 2022;
  - the Basic Conditions Statement, dated August 2022;
  - the Strategic Environmental Assessment, dated July 2022;
  - the Habitats Regulations Assessment, dated July 2022;
  - the Housing Site Allocations Appraisal, dated August 2022;
  - the Housing Viability Commentary, dated August 2022;
  - the Biodiversity Strategy, dated August 2022;
  - the Major Open Land Study, dated August 2022;
  - the Local Green Space Study, dated August 2022;
  - the Footpaths, Bridleways and Cycle Routes Study, dated August 2022;
  - all the representations that have been made in accordance with the Regulation 16 consultation;<sup>4</sup> and
  - the request for additional clarification sought in my letter of 8 February 2023 to BC and the MMNF and their responses dated 15 February and 22 February 2023 respectively.<sup>5</sup>

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<sup>4</sup> View at: <https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/Marton-Moss-Neighbourhood-Plan-%E2%80%93-Background-information-and-previous-consultation.aspx>

<sup>5</sup> View at: <https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Planning/Planning-policy/Blackpool-local-plan/Marton-Moss-neighbourhood-plan.aspx>

## Site Visit

- 2.4 I made an unaccompanied site inspection to the MMNP Area on 16 February 2023 to familiarise myself with it and visit relevant locations referenced in the Plan and evidential documents.

## Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. No requests for a hearing session were received.

## Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix to this report.

## 3. Procedural Compliance and Human Rights

### Qualifying Body and Neighbourhood Plan Area

- 3.1 The Marton Moss Neighbourhood Plan has been prepared and submitted for examination by the MMNF, which is a qualifying body. The MMNP extends over all the area designated by BC in March 2019.

### Plan Period

- 3.2 In paragraph 4 of the Introduction, the period of the Plan is described as from 2020 to 2030. I recommend that, in order to be clear for all users of the Plan, the period should be stated on the front cover. **(PM1)**

### Neighbourhood Plan Preparation and Consultation

- 3.3 The comprehensive Consultation Statement (CS) describes the thorough preparation of the Plan with involvement of the public and various stakeholders at many stages of the process. Public drop in events were held prior to the formation of the MMNF. A call for sites had been established as part of the preparation for the Local Plan Part 2 (see paragraph 2.1 above) and these were assessed as part of the MMNP with other sites included as identified in the neighbourhood planning process. A Facebook page was created. A residents survey was carried out and a Design Code drafted. An informal consultation was carried out for six

weeks from 21 July 2020 with local and statutory stakeholders through an online comments form and emails. A meeting was also held in 2020 with local horticulturalists.

- 3.4 The Pre-Submission Plan was published for consultation under Regulation 14 of the 2012 Regulations from 7 March 2022 for a period of six weeks until 19 April 2022. The list of consultees is recorded in Appendix G of the CS together with the comments made, the replies by the MMNF and any resulting changes to the Plan. These are described on pages 76 – 92 of the CS.
- 3.5 The Plan was submitted to BC in August 2022. Consultation in accordance with Regulation 16 was carried out for six weeks from 17 October until 28 November 2022. 31 representations were received. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the MMNP, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

#### Development and Use of Land

- 3.6 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

#### Excluded Development

- 3.7 The Plan does not include provisions and policies for 'excluded development'.

#### Human Rights

- 3.8 The Basic Conditions Statement (BCS) advises that the MMNP is fully compatible with the European Convention on Human Rights, transported into law by the Human Rights Act 1998. The MMNP has been prepared within the existing framework of statute, national planning policy and guidance, local level strategic policies, which are compatible with the Convention. I am aware from the Consultation Statement that considerable emphasis was placed throughout the consultation process to ensure that no sections of the community were isolated or excluded. I have considered this matter independently and I have found no reason to disagree with the statements in the BCS and I am satisfied that the policies will not have a discriminatory impact on any particular group of individuals.

## 4. Compliance with the Basic Conditions

### EU Obligations

- 4.1 The report of the Strategic Environmental Assessment (SEA) concluded that the Plan is likely to lead to significant positive effects (population and housing) and minor positive effects (biodiversity, climate change, historic environment and landscape). The three statutory consultees were notified of the report at the Regulation 16 consultation and made no adverse comments.
- 4.2 So far as Habitats Regulations Assessment (HRA) is concerned, the Ribble and Alt Estuaries (Ramsar and Special Protection Area (SPA)), are located about 3km from the Plan area. The HRA report concluded that likely significant effects from the housing allocations and windfall housing policies, and from the footpaths, bridleways and cycle routes policy on the Ramsar and SPA could not be screened out, mostly due to recreational pressure and the loss of functionally linked land.
- 4.3 Following Appropriate Assessment, it was concluded that, provided the recommended changes outlined in the HRA are included in the Plan, the MMNP will contain a sufficient policy framework to ensure no adverse effects on the integrity of international designated sites will occur in isolation or in combination with other projects and plans. The recommendations were that for recreational pressure, the Plan should add a caveat that residential development will only be supported if the developer commits to providing homeowner packs to new residents identifying the disturbance sensitivity of the wintering waterfowl using the Ribble Estuary, encouraging responsible dog ownership and identifying other areas of accessible greenspace that could be visited as an alternative. Similarly, improvements to access to existing footpaths and bridlepaths should be contingent on them not exacerbating recreational pressure issues at the SPA and Ramsar sites. Having considered that assessment, Natural England concurred with the conclusions.<sup>6</sup>
- 4.4 I have read the SEA and HRA and the other information provided, and having considered the matter independently, I also agree with the conclusions. Therefore, I am satisfied that the MMNP is compatible with EU obligations.

### Main Issues

- 4.5 Having considered whether the Plan complies with various procedural and legal requirements, it is now necessary to deal with whether it complies with the remaining Basic Conditions, particularly the regard it pays to national policy and guidance, the contribution it makes to the achievement of sustainable development and whether it is in general conformity with strategic development plan policies. I test the Plan

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<sup>6</sup> Reply from Natural England, dated 6 October 2021.

against the Basic Conditions by considering specific issues of compliance of all the Plan's policies.

- 4.6 As part of that assessment, I consider whether the policies are sufficiently clear and unambiguous, having regard to advice in the PPG. A neighbourhood plan policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>7</sup>
- 4.7 Accordingly, having regard to the Marton Moss Neighbourhood Plan, the consultation responses, other evidence<sup>8</sup> and the site visit, I consider that the main issues in this examination are whether the MMNP policies: (i) have regard to national policy and guidance; (ii) are in general conformity with the adopted strategic planning policies; and (iii) would contribute to the achievement of sustainable development? I shall assess these issues by considering the policies within the themes in the sequence in which they appear in the Plan.

### Vision and Objectives

- 4.8 The overall vision for the MMNP is described in paragraphs 14 and 15 on page 9 of the Plan. The vision is then used to develop 10 objectives which are tabulated according to how each objective will be achieved, other benefits which would accrue and which policy will deliver what objective. These set the context for the subsequent land use policies.

### Policy MM1 Building Design

- 4.9 Policy MM1 supports the design of proposals for new development subject to criteria a. to e. Criterion a. requires that the provisions set out in the Marton Moss Design Code are reflected in the submitted scheme. Criterion c. considers drainage requirements about which United Utilities suggested including a long separate policy and raised detailed concerns about the stipulation in the policy that there should be no site level raising. For those reasons, I consider that the site level raising phrase should be deleted but with the addition of a reference to PPG advice on drainage and flood risk. **(PM2)** Subject to those modifications, I consider that the policy would have regard to national guidance<sup>9</sup>, would generally conform with Policies CS1, CS7, CS8 & CS9 of the BLP Part 1 and would meet the Basic Conditions.

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<sup>7</sup> PPG Reference ID: 41-041-20140306.

<sup>8</sup> The other evidence includes the responses from BC and the MMNF received on 15 February and 22 February 2023 respectively, to the questions in my letter of 8 February 2023.

<sup>9</sup> NPPF: paragraphs 126 – 130, 153 & 174.

## Policy MM2 Open Land Character

- 4.10 Policy MM2 defines three areas of Major Open Land which are to be safeguarded in order to maintain their contribution to the overall character of Marton Moss and the green infrastructure. The policy seeks to restrict development not only on Major Open Land, but also on significant open land elsewhere, and I consider that the latter category is too uncertain and lacking in clarity for development management to be effective. Therefore, I shall recommend the deletion of the phrase. **(PM3)** Subject to that modification, the policy will have regard to national guidance<sup>10</sup>, generally conforms with Policies CS1, CS6, CS7 & CS21 of the BLP Part 1 and meets the Basic Conditions.

## Policy MM3 School Road/Midgeland Road Junction

- 4.11 Policy MM3 seeks to improve the appearance of the land around the junction of School Road and Midgeland Road. I consider that the policy has regard to national guidance<sup>11</sup>, generally conforms with Policy CS7 of the BCLP Part 1 and meet the Basic Conditions.

## Policy MM4 Housing Site Allocations

- 4.12 Policy MM4 allocates 21 mostly small sites for housing in the Plan area which would accommodate overall between 71 and 81 dwellings.<sup>12</sup> Some allocations within the policy show alternatives as appropriate forms of development. For example, Site C states that development could be at least 6 terraced houses fronting Common Edge Road and 1 detached dwelling or 5 terraced houses fronting School Lane. In my questions seeking clarification, I queried whether expressing the appropriate forms of development as alternatives would offer sufficient clarity for effective development management.
- 4.13 Although the MMNF would prefer no changes made to the descriptions, I agree with BC that the wording I canvassed in my question no. 6 b. would provide flexibility to guide the development of the site allocation, together with an upper limit to help guard against inappropriate and excessive development within whole plots, and would assist in protecting the distinctive character of Marton Moss. Therefore, I shall recommend modifications to the descriptions of appropriate development in Sites C, G and H. **(PM4)**
- 4.14 I agree with the responses from the MNNF about the exclusion of Sites A, K and M and Sites MM1, MM2 and MM3 (based on the AECOM schedule) from the Plan. I also agree with the reasoning of the MMNF for the reduction from 3 detached dwellings to 2 at Site N and the reason from

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<sup>10</sup> NPPF: paragraphs 120 & 174.

<sup>11</sup> NPPF: paragraph 130.

<sup>12</sup> See response to question 9 from MMNF, dated 22 February 2023.

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BC for the altered description at Site I, which I shall recommend as a modification. **(PM4)**

#### Policy MM5 Windfall Housing

4.15 Policy MM5 supports housing development on land not allocated for that purpose, subject to five criteria. The policy would have regard to national guidance<sup>13</sup>, would generally conform with Policy CS2 of the BLP Part 1 and would meet the Basic Conditions.

#### Policy MM6 Market Gardening Businesses

4.16 Policy MM6 supports development involving the re-use of an existing glasshouse and/or the diversification of an operating horticultural business with certain provisos. In order to enable the policy to generally conform with Policy CS4 of the BLP Part 1, BC has suggested an amendment to clause c., the deletion of clause d. and the addition of a final sentence. The MMNF has agreed with the suggestions and so do I for the same reasons as advanced by BC, other than the requirement to comply with the NPPF which is taken as read. Therefore, I shall recommend them as a modification to the policy which would then also have regard to national guidance<sup>14</sup> and meet the Basic Conditions. **(PM5)**

#### Policy MM7 Horse Stabling and Riding Activities

4.17 Policy MM7 supports proposals for development involving equestrian use. The policy has regard to national guidance, generally conforms with key objective 11 of the BLP Part 1 and meets the Basic Conditions.

#### Policy MM8 Midgeland Farm

4.18 Midgeland Farm, bought by Blackpool Corporation in 1968 and now owned by Lancashire County Council, is a locally listed farm, where associated land has been used as landfill which is now restored. Policy MM8 seeks to safeguard it for community use and to retain at least part of the remains of the buildings. BC has suggested amendments to the policy based on the structural condition and the future of the buildings at the farm to which the MMNF agree. I also agree with the suggestions and shall recommend them as modifications. **(PM6)** The policy would then have regard to national guidance<sup>15</sup>, would generally conform with key objective 5 of the BLP Part 1 and would meet the Basic Conditions.

#### Policy MM9 Local Green Space

4.19 Policy MM9 designates one Local Green Space (LGS) immediately to the north of St Nicholas School. As explained in the NPPF, LGS designation

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<sup>13</sup> NPPF: paragraph 71.

<sup>14</sup> NPPF: paragraph 84 and 86.

<sup>15</sup> NPPF: paragraphs 92, 93 & 190.

should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.<sup>16</sup> LGS should also be capable of enduring beyond the end of the Plan period.<sup>17</sup> I consider that the LGS meets the criteria for designation outlined in the NPPF and I also note that the land is owned by BC and is a well-used area of informal recreational open space.

- 4.20 However, the policy states that only minor buildings or similar structures ancillary to and essential for the open recreational enjoyment of this land will be permitted. This does not have due regard to national guidance<sup>18</sup>, (albeit it is correctly stated in paragraph 137 of the Plan which immediately precedes Policy MM9), so I shall recommend an appropriate modification to address this. **(PM7)** Therefore, subject to the modification, I consider that Policy MM9 would have regard to national guidance, would generally conform with Policy CS6 of the BLP Part 1 and would meet the Basic Conditions.

#### Policy MM10 Footpaths, Bridleways and Cycle Routes

- 4.21 Policy MM10 requires development proposals to improve accessibility, where feasible, and to take opportunities to create new multi modal paths along routes where links are missing. The improvements will assist in diverting recreational pressure from the Ribble and Alt Estuaries SPA and Ramsar. The policy has regard to national guidance<sup>19</sup>, generally conforms with Policy CS6 of the BLP Part 1 and meets the Basic Conditions.

#### Overview

- 4.22 Therefore, on the evidence before me, with the recommended modifications, I consider that the policies within the MMNP are in general conformity with the strategic policies of the BLP Part 1, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.
- 4.23 A consequence of the acceptance of the recommended modifications would be that amendments would have to be made to the explanation within the Plan in order to make it logical and suitable for the referendum. These might also include incorporating factual updates, correcting minor inaccuracies, and simple text improvements such as those suggested helpfully by BC in the Regulation 16 Consultation responses, by the MMNF in the response of 22 February 2023 to my questions of clarification, and

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<sup>16</sup> NPPF: paragraph 102.

<sup>17</sup> NPPF: paragraph 101.

<sup>18</sup> NPPF: paragraphs 103, 147 - 151.

<sup>19</sup> NPPF: paragraph 100 & 104.



in other Regulation 16 representations. None of these alterations would affect the ability of the Plan to meet the Basic Conditions and could be undertaken as minor, non-material changes.<sup>20</sup>

## 5. Conclusions

### Summary

- 5.1 The Marton Moss Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the MMNP, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The MMNP, as modified, has no policy or proposal which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

### Concluding Comments

- 5.4 The MMNF and other voluntary contributors are to be commended for their efforts in producing a Plan which has the merits of being concise and comprehensive. The Plan is logical, very informative and well-illustrated. I enjoyed examining it and visiting the area. I agree with the comment by the Chairman of the MMNF in the Foreword to the Plan that it has been pitched "about right." The Consultation Statement and the Basic Conditions Statement were extremely useful, as were the constructive responses from the MMNF and BC to my questions of clarification.
- 5.5 Subject to the recommended modifications, the MMNP will make a positive contribution to the Development Plan for the area and should enable the attractive character and appearance of Marton Moss to be maintained whilst enabling sustainable development to proceed.

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<sup>20</sup> PPG Reference ID: 41-106-20190509.

*Andrew Mead*

Examiner

## Appendix: Modifications

<b>Proposed modification no. (PM)</b>	<b>Page no./ other reference</b>	<b>Modification</b>
PM1	Front cover	Include within the title: <b>"2020 – 2030"</b> .
PM2	Policy MM1	c. Delete: "... with no site level raising ...".  Substitute: "... local dyke network, <b>subject to advice on sustainable drainage and flood risk in the PPG.</b> "
PM3	Policy MM2	Delete: "... and significant open land elsewhere ...".
PM4	Policy MM4	Amend the "Appropriate forms of development" to:  Site C: <b>"No more than 11 dwellings."</b> Site G: <b>"No more than 8 dwellings."</b> Site H: <b>"No more than 6 dwellings."</b> Site I: <b>"1 detached dwelling fronting School Road."</b>
PM5	Policy MM6	Amend c. to: <b>"would not unduly disturb neighbouring residential occupiers."</b>  Delete d.  Add a final sentence: <b>"Where the proposal is for a town centre use, it will need to comply with Blackpool Local Plan Policies CS4: Retail and Other Town Centre Uses; and DM15: Threshold for Impact Assessment."</b>
PM6	Policy MM8	Amend b. to:  <b>"measures to retain, as far as reasonably practicable, the structure of the farmhouse, stable, barn and early shippens will be supported. Any loss will be mitigated by measures to preserve any remaining structures and/or programme of archaeological recording."</b>
PM7	Policy MM9	Amend the policy to:

		<b>“Open land used for informal recreation immediately to the North of St Nicholas School, as shown on the Policies Map is designated as Local Green Space where development will be managed in accordance with national policy for Green Belts.”</b>
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# Blackpool Council

## Marton Moss Neighbourhood Plan

### Regulation 19 (Final) Decision Statement

This Statement was published on xx December 2023, pursuant to Section 38A(9) of the Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Neighbourhood Planning (General) Regulations 2012/637.

Blackpool Council has 'made' the Marton Moss Neighbourhood Plan under Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended). The Marton Moss Neighbourhood Plan now forms part of the Development Plan for Blackpool.

#### 1.0 Summary

- 1.1 This document is the Decision Statement required to be prepared under Section 38A(9) of the Planning and Compulsory Purchase Act 2004 (as amended) and Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). It sets out the Council's considerations and formal decision in bringing the Marton Moss Neighbourhood Plan into legal force.
- 1.2 Following an independent examination and positive referendum result, held on 5th October 2023, Blackpool Council decided to make the Marton Moss Neighbourhood Plan under Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended).

#### 2.0 Background

- 2.1 The Council formally designated the Marton Moss Neighbourhood Area and Neighbourhood Forum on 26th March 2019 in accordance with the Neighbourhood Plan (General) Regulations (as amended) 2012 - Regulations 7 and 10. This established the process for the Marton Moss Neighbourhood Forum (MMNF) as the qualifying body to produce a neighbourhood plan for the designated area.

- 2.2 The Forum submitted their draft plan, which covers the period 2020 to 2030, to the Council (Regulation 15) in August 2022. The Council published the draft plan for consultation in accordance with Regulation 16 in October 2022.
- 2.3 The Council appointed an independent examiner in February 2023, in agreement with the MMNF, in accordance with Regulation 17 and the examiner published his report, which the Council received on 29th March 2023.
- 2.4 The Council published their decision in accordance with Regulation 17a and accepted the examiner's recommendations and proposed modifications to allow the Referendum Plan to progress towards becoming a 'made' plan and part of Blackpool's development plan, subject to a 'yes' vote in a referendum.
- 2.5 A local referendum was held in Marton Moss on 5<sup>th</sup> October 2023 to decide whether the local community were in favour of the Plan. Of the votes received, 246 (90.44%) voted 'yes' in response to the referendum question. The turnout of electors was 32.19%.

### **3.0 Decisions and Reasons**

- 3.1 Blackpool Council decided by resolution of Full Council on 29<sup>th</sup> November 2023 to 'make' (adopt) the Marton Moss Neighbourhood Plan.
- 3.2 Blackpool Council as the local authority 'makes' the Marton Moss Neighbourhood Plan as part of the Development Plan in accordance with Section 38A (4) of the Planning and Compulsory Purchase Act 2004 (as amended). The Marton Moss Neighbourhood Plan now forms part of the Development Plan for Blackpool. Planning applications in the Neighbourhood Plan Area must be considered against the Marton Moss Neighbourhood Plan, as well as existing national planning policy and the Blackpool Local Plan.
- 3.3 On 5<sup>th</sup> October 2023 the Plan was subject to a referendum which returned a vote in favour of the Plan being used to help decide planning applications. Section 38A (4) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that the Council must 'make' the Plan if more than half of those voting have voted in favour of the plan.
- 3.4 The Council has assessed the Plan and concluded that the Plan, including its preparation, is compatible with EU obligation and the Convention Rights (within the meaning of the Human Rights Act 1998) and complies with the relevant provisions within the Planning and Compulsory Purchase Act 2004 (as amended).
- 3.5 The adopted version of the Marton Moss Neighbourhood Plan (as approved by Full Council) was published on the Council's website, alongside this Marton Moss Neighbourhood Plan Decision Statement, on xxxxxx 2023.

**E Jane Saleh, Head of Planning (Strategy) – Growing Places Division**

<b>Report to:</b>	<b>EXECUTIVE</b>
<b>Relevant Officer:</b>	Scott Butterfield, Strategy Policy and Research Manager
<b>Relevant Cabinet Member:</b>	Councillor Jane Hugo, Cabinet Member for Climate Change
<b>Date of Meeting:</b>	6 November 2023

## **ELECTRIC VEHICLE CHARGING IN BLACKPOOL – FUNDING SUBMISSION**

### **1.0 Purpose of the report**

1.1 To present a potential submission for Local Electric Vehicle Infrastructure funding for approval.

### **2.0 Recommendation(s)**

2.1 To approve the proposed delivery model and hierarchy of sites outlined in 6.9 and 6.10.

2.2 To submit a funding bid of up £1.708m to the Local Electric Vehicle Infrastructure support body by 30 November 2023.

### **3.0 Reason for recommendation(s)**

3.1 To ensure the continued rollout of Electric Vehicle (EV) chargepoints in support of the UK government’s policy ambitions on increasing Electric Vehicle uptake.

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

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

### **4.0 Other alternative options to be considered:**

4.1 Not to submit a bid. The Local Electric Vehicle Infrastructure Support Body, acting on behalf of the Office of Zero Emission Vehicles, has advised that it is highly unlikely further funding would be made available should the council choose not to proceed with a funding bid at this time. The proposed approach balances the low uptake of Electric Vehicles in Blackpool with a general requirement to support people who do not have access to off-street parking with charging facilities.

To submit a bid based on an alternative delivery model, for example by using on-street charging as the primary delivery mechanism for Electric Vehicle charging. This would

cause substantial disruption to resident parking in high-demand areas such as those covered by parking permits.

To submit a bid around an alternative financial model, for example “own and operate” rather than a concession. Analysis suggests that a model where the Chargepoint Operator would manage and operate the network in exchange for a greater share of the reward would be the most advantageous in terms of leveraging in private sector investment, and lowest financial risk option for the Council.

## **5.0 Council priority**

5.1 The work is relevant to both Council priorities and delivery of the Climate Emergency declared in 2019:

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

The work supports both of the Council’s priorities.

## **6.0 Background and key information**

6.1 In November 2020, the UK government announced a halt to sales of new petrol and diesel cars by 2030 (subsequently amended to 2035), and of new hybrid cars by 2035. The government’s Zero Emission Vehicle mandate sets minimum annual targets for manufacturers to deliver an increasing market share of zero emission cars and vans, rising from 22% of new cars sold in 2024, to 80% of new cars and 70% of new vans by 2030. Sales of Battery Electric Vehicles (BEVs) have already grown from 12.5% at the start of 2022 to 32.9% in December that year, with increased confidence in used car battery capacity also leading to record used Battery Electric Vehicles sales in Quarter 2 of 2023 of 30,500 cars; 1.7% of the used car market.

6.2 Whilst the cost of new and used Battery Electric Vehicles is starting to become more affordable, and the average distance new electric cars can travel on a single charge continues to increase, substantial barriers to increased take-up remain. These include confidence in the public charging infrastructure, the higher cost of public charging compared to domestic overnight tariffs, the inconvenience of charging compared to traditional fuels, and user perception or preference.

6.3 The distribution of charging infrastructure across the country skews towards more affluent areas with higher numbers of Battery Electric Vehicles, with Chargepoint Operators favouring more lucrative rapid charging and higher demand sites. According to government statistics at 1 July 2023, Blackpool has 22 devices per 100,000 people, which is in the bottom 20% of all Local Authority areas in Great Britain. A substantial proportion of these were provided by the Council via Local Transport Plan funding. There are currently only three rapid chargers in Blackpool, one of which was installed by the Council.



- 6.4 The Council's Electric Vehicle Strategy adopted in February 2023 set a target of providing 210 additional sockets across the town by 2028. This is in contrast to the NEVIS model promoted by the Local Electric Vehicle Infrastructure Support Body which suggests numbers of between 478 and 616 based on their preferred scenario, although these are potentially subject to revision due to the impact of the change in the phase-out date. These figures exclude provision of further workplace charging or facilities associated with planning requirements around provision of Electric Vehicle infrastructure in new developments. Historically, nationally-modelled data tends to substantially over- or under-estimate Blackpool's needs, depending on the topic at hand.
- 6.5 The primary aim of the Local Electric Vehicle Infrastructure fund criteria is to provide low powered sockets for residential areas, aimed at households without access to off-street parking. To facilitate this, on 4 September 2023, the Council was notified that it had been placed into Tranche 1 for capital funding worth up to £1.708m, subject to agreeing a delivery plan with the Local Electric Vehicle Infrastructure Support Body. An initial application for the funding is due for submission on 30 November 2023, after which the Support Body will work with the Council to ensure the project meets LEVI conditions. On approval, 90% of the funding is released, with the final 10% subject to the selection of a provider through the procurement process, and further discussion between the Support Body, Council and Supplier. The deadline for Tranche 1 authorities awarding a contract is September 2024.
- 6.6 One of the funding requirements is to leverage a substantial amount of private sector funding from the successful Chargepoint Operator following a tender process. Whilst the process to be followed is still under discussion with the Local Electric Vehicle Infrastructure Support Body, our preferred approach is to include discussions around concession terms as part of the procurement exercise, via a Competitive Procedure with Negotiation (CPN) process. The tender exercise will seek a provider for a "concession" arrangement where the LEVI funding ensures the delivery of all necessary infrastructure, and the Chargepoint Operator will be granted a site lease to provide charging services. Sites where the Council has already installed chargers would transfer to the Chargepoint Operator winning the tender exercise once existing contracts expire, with the expectation that existing chargers can be re-used wherever possible.
- 6.7 Local Electric Vehicle Infrastructure "capability" (revenue) funding has already been paid to the Council to ensure sufficient staffing resource is available for the project up until financial year 2024/25. Beyond this date, staffing costs associated with contract management and delivery would need to be covered through an arrangement with the Chargepoint Operator.

6.8 In awarding the contract to the successful Chargepoint Operator, the procurement exercise will prioritise the following key areas:

- Minimising the cost of charging to users, as prioritised to respondents of the consultation on the Electric Vehicle Strategy and in consultation with the Cabinet Member for Climate Change;
- Maximising the use of the Residential Charging Sites (RCS) model (see 6.9);
- The extent to which a Chargepoint Operator can meet the Council’s ambition of having all households in Blackpool which are without a driveway within five minutes’ walk of a chargepoint;
- The total value for money represented by the contract i.e. the total number of chargepoints being delivered and the rationale for this number.

Other considerations include that carbon emissions are considered at all points of the lifecycle of the installed chargepoint (design, manufacture, transport, installation, operation and decommissioning); that the Council has final say on the selection of chargepoint locations; the length of the contract and associated leases; retention of influence over the price of the tariff and potential to use “smart tariffs” offering cheaper rates at off-peak times; and access to usage data.

6.9 The proposed delivery model is to use Residential Charging Sites (RCS). These would provide low-power charging on existing car parks, including those associated with sites providing specific services. Rolled out initially on Council carparks and parking associated with Council properties, arrangements would be made for 24 hour charging to be accessible with additional provision for adequate lighting and security measures such as CCTV. Where the charging site is located on a car park which charges for parking, arrangements will be put in place to ensure that the total cost to residents using the facilities is limited to the cost of the charging and not the parking. Discussions have taken place with Electricity North West regarding the model, which they have indicated provides lower demands on the electrical infrastructure than some alternatives and is therefore less likely to incur significant supply upgrades. Any upgrades needed would be funded via the Local Electric Vehicle Infrastructure grant.

6.10 A data analysis is underway to determine the availability of Council and other sites which could deliver against an objective of all households without off-street parking being within 5 minutes’ walk time of a Residential Charging Sites. This would use Council-owned car parks in the first instance, followed by use of parking at other facilities where space allows. As additional sites will also be needed, the following hierarchy of alternative options will be explored to deliver the coverage needed:

- Use of other community facilities, such as health facilities, schools, church and private car parks delivered via associated leasing arrangements made between

the Chargepoint Operator and the relevant organisation, to facilitate a Residential Charging Site with 24-hour access;

- Access to rapid chargers with minimal drive times at a preferential rate;
- Delivery of on-street charging facilities which do not impinge on existing parking habitually used by residents of nearby properties (e.g. wide roads with properties on one side).

A communication and engagement process is being developed which will encourage organisations to come forward with sites, and pro-active engagement with organisations which have suitable space on site.

- 6.11 Another option for users without off-street parking, which would not be included in the arrangement with the Chargepoint Operator, would be to promote the adoption of a domestic charger-sharing scheme such as those offered by Co-charger and similar apps. In addition, Lancashire County Council are currently trialling measures to enable the safe provision of charging from a domestic property over a footway, which involves the installation of a gully system in pavements. The Council will liaise with the relevant officers to follow this trial as it continues, and assess its suitability for Blackpool.
- 6.12 The Residential Charging Site model contrasts with other localities that have chosen to provide extensive on-street charging facilities as a primary option. Guidance suggests that the government is expecting to fund and deliver an on-street model. However, the Residential Charging Site model currently represents the best balance between supporting the agenda and pragmatism that balances Blackpool residents' needs, including non- Battery Electric Vehicle car and van drivers.
- 6.13 Given the potential level of public and private funding, the Local Electric Vehicle Infrastructure Support Body expects the Council to exceed the target stated in the Electric Vehicle Strategy. The exact number of chargers and sockets which can be delivered subject to the procurement process is not currently known. Based on financial modelling using reference data from previous chargepoint installations, the level of government funding available would be likely to meet the target in the strategy without a private sector contribution. As a result, the expectation is that a significantly higher number of sockets than anticipated by the strategy will be delivered through this arrangement, although this will also be subject to the commercial model used by the successful supplier.

Does the information submitted include any exempt information? No

## **7.0 List of appendices**

- 7.1 None.

## **8.0 Financial considerations**

- 8.1 Under the Council's current model of charger installation, there is currently no funding available for equipment replacement and maintenance beyond the installation warranty, with fast charging being priced on the basis of recovering the cost of energy used. Other associated costs such as staff time and bay marking have not been incorporated into cost calculations. To resolve this, the finance team has assessed the costs of the current "own and operate" model where the Council would continue to provide, own and pay for maintenance of the chargers and electrical infrastructure, with a Chargepoint Operator providing maintenance and retail support. However, based on current use and modelling undertaken by the Finance team, the cost that the council would need to charge the consumer would be prohibitively high, leading to the selection of the concession model as the preferred option.
- 8.2 The intention is to use the Local Electric Vehicle Infrastructure funds and the existing Local Transport Plan allocation for Electric Vehicle infrastructure without further calls to Council funding. As noted in 6.7, future staffing costs will be funded by an arrangement with the successful Chargepoint Operator. If the procurement process does not result in an offer which covers these costs, the Council may need to withdraw from the funding application process. An additional £150,000 of Local Transport Plan capital funding is available for 2024/25, with some existing funding still to be spent, and further funding from this source remaining a possibility. Pending the new arrangement with the Chargepoint Operator, the Council will continue to install chargepoints using this funding.

## **9.0 Legal considerations**

- 9.1 The funding from Local Electric Vehicle Infrastructure Support Body referred to in the body of the report will contain provisions around what the money is to be spent on and when it is to be spent. These conditions will be complied with in respect of the project.
- 9.2 The procurement undertaken in respect of the project will be compliant with procurement legislation.
- 9.1 The Local Electric Vehicle Infrastructure Support Body has issued standard Heads of Terms for the procurement process, which the team are currently localising in line with the requirements of our delivery model. Legal Services have been engaged by using some Local Electric Vehicle Infrastructure Capability Funding to provide support and advice.

## **10.0 Risk management considerations**

- 10.1 *Risk of insufficient provision leading to lower than expected take-up of Electric Vehicles, or residents using dangerous charging solutions.* At this stage of the Electric Vehicle adoption process in Blackpool, with some narrow thoroughfares and permit parking on many streets, delivering substantial on-street charging facilities would be difficult to implement consistently. It would also displace other motorists or risk "bay blocking" where non-electric cars park in

electric-only spaces. However, there is a risk that the performance target of all properties being within 5 minutes' walk of a charger will not be met. This would reduce charging convenience and incentives to switch to Electric Vehicle . There is a further risk of people trailing cables out of windows and over footways creating a trip hazard, which has been witnessed locally. Using extension cables to supplement car charging cables also creates a fire risk.

- 10.2 *Risks associated with batteries.* In contrast to smaller battery-based transportation, data analysis from the USA shows that the risk of fires in electric vehicles is substantially lower per 100,000 vehicles than in petrol and diesel cars. However, the nature of the fires means they take longer to burn themselves out, contain more toxins, and are more difficult to extinguish with current fire-fighting equipment. Careful consideration therefore needs to be given to siting chargers appropriately to minimise risks. A risk assessment process has been established which considers mitigation measures as part of the installation of new devices.

#### **11.0 Equalities considerations and the impact of this decision for our children and young people:**

- 11.1 An Equality Analysis was undertaken within the strategy development process. This particularly notes the importance of well-lit, secure charging facilities for vulnerable motorists charging at night, and the role of the new Accessible Chargepoint standard PAS1899 in ensuring that motorists with disabilities are able to charge their vehicles. Whilst our aim should be to ensure sites are accessible to PAS1899 wherever possible, sites would require more space and potentially manual support for users.
- 11.2 There are no direct equalities implications arising for children and young people. Provision of charging facilities supports the transition to a low carbon economy, and contributes towards a more sustainable future for future generations.
- 11.3 The existing Equality Analysis undertaken on the Electric Vehicle strategy is being reviewed and updated to explore the Residential Charging Sites model in more detail, and actions identified will be included in the Delivery Plan.

#### **12.0 Sustainability, climate change and environmental considerations**

- 12.1 The Council's Sustainability Impact Assessment process was used throughout the development of the Electric Vehicle Strategy. The scheme would potentially lead to an increase in electricity use locally, but this can be accommodated within the National Grid's transition from fossil fuel derived power. Focusing on providing slower speed low power devices minimises the impact on the Distributed Network Operator's (Electricity North West) infrastructure. The funding has the potential to positively impact on the number of journeys made to Blackpool by Electric Vehicles as chargepoint provision will be promoted and made available via Chargepoint Operator and third party apps e.g. Zap Map,

Plugshare as well as the Council's website.

### **13.0 Internal/external consultation undertaken**

- 13.1 Stakeholder events were held in March 2022 with key local businesses and organisations, which influenced the Electric Vehicle Infrastructure Strategy. Drop in sessions for Councillors were held in June 2022 to explain the planned strategy and take comments. A public engagement exercise on the draft strategy took place with the findings used to shape the document. Further public engagement will be undertaken where required in the selection and delivery of individual sites.
- 13.2 Internal consultation has been via the Electric Vehicle Steering Group, which is chaired by the Strategy and Climate Lead and includes representatives from Transport Policy, Procurement, Highways, Asset Management and Parking Services, with other services and Wholly-Owned Companies invited and represented as required. The Corporate Energy and Utilities Group agreed to act as Project Board for the Local Electric Vehicle Infrastructure funding at its meeting of 14 September 2023.
- 13.3 Details of the proposed model and its implications were reported to the Climate Change and Environment Scrutiny Committee meeting of 27 September 2023, with the Committee raising no fundamental concerns about the delivery model.

### **14.0 Background papers**

- 14.1 None

### **15.0 Key decision information**

- 15.1 Is this a key decision? No
- 15.2 If so, Forward Plan reference number:
- 15.3 If a key decision, is the decision required in less than five days? No
- 15.4 If **yes**, please describe the reason for urgency:

### **16.0 Call-in information**

- 16.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No
- 16.2 If **yes**, please give reason:

**TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE**

**17.0 Scrutiny Committee Chair consultation (where appropriate)**

Date informed:

Date approved:

**18.0 Declarations of interest (if applicable)**

18.1

**19.0 Summary of Discussion:**

19.1

**20.0 Executive decision**

20.1

**21.0 Date of decision**

21.1

**22.0 Reason(s) for decision**

22.1

**23.0 Date decision published**

23.1

**24.0 Alternative Options Considered and Rejected:**

24.1

**25.0 Executive Members in attendance**

25.1

**26.0 Call-in information**

26.1

**27.0 Notes**

27.1