

Officer Report to Committee

Application ref:	22/0265
Ward:	Stanley
Application type:	Outline
Location:	Land bounded by Amy Johnson Way, Common Edge Road, Jepson Way, School Road and Blackpool Airport, Blackpool, FY4 5DY
Proposal:	Outline planning application with all matters reserved for: <ul style="list-style-type: none">• Reconfiguration of Common Edge Road to create a new point of access into the Enterprise Zone and provision of new spine road from this access point to Amy Johnson Way;• Erection of up to 35,000sqm of business, industrial and storage and warehousing uses (Classes E(g), B2 and B8);• Erection of up to 130sqm day nursery floorspace (class E(f));• Erection of up to 275sqm retail floorspace (class E(a));• Erection of up to 275sqm cafe floorspace (class E(b));• Highways works including reconfiguration of the junction of Common Edge Road and School Road;• Associated infrastructure including drainage works, electric vehicle charging hub, substation, car parking and landscaping;• Demolition of two single storey buildings at Collins Park and no. 2 School Road.
Meeting date:	11 October 2022
Recommendation:	Resolve to grant planning permission and refer the application to the Secretary of State
Case officer:	Clare Johnson
Case officer contact:	01253 476224

1.0 BLACKPOOL COUNCIL PLAN 2019-2024

- 1.1 The Council Plan sets out two priorities. The first is ‘the economy: maximising growth and opportunity across Blackpool’, and the second is ‘communities: creating stronger communities and increasing resilience.
- 1.2 This application would accord with both priorities by enabling the delivery of a major-scale employment site of sub-regional significance, offering substantial economic growth and employment opportunities.

2.0 SUMMARY OF RECOMMENDATION

- 2.1 This outline application proposes major scale, employment-led development on a site that is a Government-endorsed and designated Enterprise Zone. The majority of the site is Green Belt, protected open space and protected playing pitches under the current Local Plan. However, emerging policies (DM7 and DM8) in the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies document (Part 2), would take away those designations. These policies seek to protect the Enterprise Zone designation to deliver significant economic growth and diversification, and to increase and widen employment opportunities in Blackpool and the sub-region. The application would contribute to an

unmet need for employment floorspace in Blackpool and would sit squarely with the Governments Levelling Up agenda.

- 2.2 Whilst the proposal is a departure from the current Local Plan, Part 2 has been through examination in public in December 2021 and the consultation on the Proposed Main Modifications, which were agreed with the examining Inspector, concluded on the 7 September 2022. No objections to Policies DM7 or DM8 have been made and so, at this stage, Policies DM7 and DM8 can be given significant weight. It is anticipated that the Part 2 will be adopted early in 2023.
- 2.3 As such, subject to conditions and the submission of further details which are currently reserved, it is considered that, on balance, the proposals would constitute sustainable development which would have significant public benefits which would outweigh the current Local Plan designations.
- 2.4 It is recommended that the Planning Committee resolves to grant outline planning permission, subject to the suite of conditions at the end of this report, and to instruct officers to refer the application to the Secretary of State, as is necessary when approval of a departure from the Development Plan is proposed.

3.0 INTRODUCTION AND BACKGROUND

- 3.1 This application is before Members because it is a major Council scheme of sub-regional significance.
- 3.2 The policy to create a new generation of Enterprise Zones across the UK was announced by the Chancellor George Osborne in March 2011. Enterprise Zones are designated areas of employment land where special policies apply which are designed to encourage business growth. Established by primary legislation, Enterprise Zones do not come with direct central government funding but do benefit from a number of fiscal powers and incentives.
- 3.3 In early January 2015 the Lancashire Local Enterprise Partnership received a specific request from the then Chancellor, George Osborne and the Treasury Department inviting a proposal for the establishment of an Enterprise Zone at Blackpool Airport including adjacent existing employment areas located in both Blackpool and Fylde local authority areas. This request was a direct response to lobbying from local MPs following the temporary closure of Blackpool Airport in October 2014.
- 3.4 A business case was drafted on behalf of the Lancashire Local Enterprise Partnership and the Blackpool, Fylde and Wyre Economic Development Company and, following approval by these bodies, was submitted to Government at the end of January 2015.
- 3.5 The business case presented the economic and financial impact of granting Enterprise Zone status to the Blackpool Airport Corridor development area and looked at the economic impact in terms of jobs and businesses that could be attracted to the site and the financial impact in terms of business rate retention.
- 3.6 The bid was successful with the Chancellor announcing on behalf of Government the designation of Enterprise Zones on 12 November 2015 as part of the Autumn Financial Statement.

- 3.7 The Enterprise Zone became operational in April 2016 with a 25-year designation providing fiscal powers and incentives related to rate-relief of up to £55,000 per annum for qualifying businesses over a period of five years, and Enhanced Capital Allowance. The Enterprise Zone covers 144 hectares and is one of the largest Enterprise Zones in the UK. Around 62 hectares lie within Blackpool and 82 hectares in Fylde.
- 3.8 Following operational commencement of the Enterprise Zone in April 2016, a Memorandum of Understanding was entered into on 9 November 2016 with Ministerial signatory Andrew Pearce MP on behalf of Department for Communities and Local Government, alongside the Lancashire Local Economic Partnership, Lancashire County Council, Fylde Borough Council and Blackpool Council. The Memorandum of Understanding sets out the objectives and responsibilities of the parties and established Blackpool Council as the 'Accountable Body' which has the obligation to progress the development of Enterprise Zones and has the ability to utilise fiscal powers. Fylde Borough Council agreed that all Enterprise Zone business rates growth generated within the Fylde sector of the Enterprise Zone would be passed to Blackpool Council to enable Blackpool Council to take the Enterprise Zone forward.
- 3.9 Over its 25-year lifespan, the aim of Enterprise Zone is to transform the economic base of Blackpool and the Fylde coast and to position itself as a premier business location in the North West.
- 3.10 The Enterprise Zone is targeting a wide range of sectors including food and drink manufacturers, energy, aviation, creative and digital, advanced manufacturing and professional services. However, there is potential for other commercial activity to operate on the site, whether in existing or new buildings.
- 3.11 The Enterprise Zone will assist in the diversification of the local economy, which in Blackpool relies heavily on a seasonal tourism and public administration and create a sustainable future for Blackpool Airport. The Enterprise Zone Delivery Plan indicates that within the lifetime of the Enterprise Zone, it would:
- create 5000 new jobs;
 - attract 280 new businesses;
 - attract £300m plus of private sector investment;
 - generate a cumulative Gross Valued Added total over the first five years of £232m and £2.08bn over the Enterprise Zone lifetime;
- 3.12 Specifically the Enterprise Zone will provide, consolidate and update infrastructure; unlock development sites and provide an opportunity to accommodate larger footprint occupiers not currently available in Blackpool and the Fylde Coast; attract new business and enable local business to grow and deliver long-term sustainable employment.
- 3.13 In 2017, the Blackpool, Fylde and Wyre Economic Development Company commissioned consultants to produce a Development Masterplan for the EZ based on the original submission for the Enterprise Zone to provide a strategic framework for shaping the future delivery of the site. The Masterplan was approved by both Blackpool and Fylde Council's in 2018 and was updated in 2020. As the site evolves, further updated iterations of the Masterplan will be produced, at least every five years, to ensure the Masterplan accurately reflects and supports Enterprise Zone development and the evolving economic circumstances.
- 3.14 The part of Enterprise Zone which lies within the Blackpool authority area includes the existing Sycamore Industrial Estate, Squires Gate Industrial Estate and Blackpool Business

Park, as well as the land used for sport playing fields in the south east corner of the site (part of the application site). Blackpool Retail Park, which fronts onto Squires Gate Lane, is not included in the Enterprise Zone designation, nor is the airport runway or operational land although future phases would include the re-organisation and re-location of infrastructure such as the control tower, to enable further employment land to come forward in the next plan period (2027-2042).

- 3.15 The land subject to this application lies predominantly within Blackpool, with only a small element of the highway's improvement works on Common Edge Road and Division Lane, lying within Fylde Council's administrative boundary. The application site is in the south-east corner of the Enterprise Zone and currently includes football pitches and associated facilities. An outline planning application was submitted to both Blackpool and Fylde Council's in April 2019 for consideration of a mix of uses associated with the Masterplan. However, these applications were withdrawn and the proposals for this part of the Enterprise Zone were broken down into three separate but inter-related applications, to enable the phased commencement of works and ensure that no loss of sporting provision would result.
- 3.16 The first application (phase 1) for grass football pitches was submitted in February 2020 (application ref: Blackpool 20/0108 and Fylde 20/0114), with approval granted in August 2020. These football pitches have been completed and were brought into use in the 2021/2022 season.
- 3.17 A second application (phase 2) was for further sports development, with new changing facilities and social room, a 3G pitch, grass pitches and training area and extension to an existing car park with some associated highway works (application ref: Blackpool 20/0564 and Fylde 20/0677). Blackpool Council approved this development in August 2021 and Fylde Council granted permission June 2022. It is anticipated that the changing room facility will be ready for the next football season in September 2022 and the other facilities will be available at the start of the 2023/24 seasons.
- 3.18 The phase 1 and phase 2 applications comprise the full extent of sporting re-provision and enhancement to the southeast corner of the Enterprise Zone. They enable phase 3 employment development and associated infrastructure works to come forward on the application site to the north.

4.0 SITE DESCRIPTION

- 4.1 The application relates to the land between the Blackpool Business Park /Amy Johnson Way to the west, a mix of residential and commercial uses on Common Edge Road and the Marton Moss Conservation Area to the east. There are industrial uses on Squires Gate Industrial Estate, a football pitch and houses on Jepson Way and Oakwood Close to the north/ north east. The site of the recently approved replacement sports facilities, existing cricket pitch and associated club building and Blackpool Airport main runway are to the south. The site is approximately 4.5km to the south west of the Blackpool Town Centre, approximately 3km from the M55 motorway and approximately 1.8km from Blackpool Squires Gate Train Station (as the crow flies).
- 4.2 The site slopes down slightly from the north to the south-east, and is on the edge of the urban area. The majority of the site comprises approximately 9ha of Green Belt/ public open space which incorporates around 7.2ha of playing fields and associated infrastructure. The north-west of the site is an old waste lagoon associated with airport operations.

- 4.3 There are four individual trees, 12 tree groups and two hedgerows on or adjacent to the site and there is an open watercourse which runs from north to south through the centre of the site, which discharges into a water course adjacent to Division Lane West. To the south-east corner of the site is a wetland area which is connected to the watercourse adjacent Division Lane West.
- 4.4 Within the red edge there is a small, disused building which was used in association with the playing pitches. The existing changing rooms and adjacent hard surfaced parking area south of Jepson Way are not within the red edge, but that area is annotated on the plans as a future development site.
- 4.5 The red edge includes a section of Common Edge Road and Jepson Way to the east, including the junctions with School Road and Division Lane, and a small section of Amy Johnson Way to the west. The red edge also includes 2 School Road, which is a detached two-storey dwelling at the School Road/ Common Edge Road junction. The total application site is approximately 13.58ha in area.
- 4.6 In terms of constraints, the site is wholly within Flood Zone 1 and falls within the Blackpool Airport and Warton Aerodrome safeguarding zones. The majority of the application site is currently designated Green Belt, public open space and protected playing fields, and the site also abuts the Marton Moss Conservation Area. There is a parcel of contaminated land to the east of Amy Johnson Way and the site is within a landfill-gas consultation zone. The north of the site is also currently within the Health and Safety Executive consultation zone due to a Hazardous Substances Consent that sits with the land to the north. No other site-specific constraints are identified.

Figure 1: Extract from Local Plan Proposals Map showing relevant allocations and designations



*Land bound by darker green line is protected Playing Fields and Sports Grounds (Policy BH7); solid green area is protected Public Open Space (Policy BH5); green/white diagonal striped land is Green Belt (Policy NE1). The diagonal lines across the solid green area of Public Open Space denote that this land is also Green Belt. The solid purple and purple hatched areas are safeguarded employment land within the Enterprise Zone and Squires Gate Industrial Estate.

5.0 DETAILS OF THE PROPOSAL

- 5.1 This application seeks outline planning permission with all matters reserved for:
- Reconfiguration of Common Edge Road to create a new point of access into the Enterprise Zone and provision of new spine road from this access point to Amy Johnson Way;
 - Erection of up to 35,000sqm of business, industrial and storage and warehousing uses (Classes E(g), B2 and B8);
 - Erection of up to 275sqm retail floorspace (Class E(a));
 - Erection of up to 275sqm cafe floorspace (Class E(b));
 - Highways works including reconfiguration of the junction of Common Edge Road and School Road;
 - Associated infrastructure including drainage works, electric vehicle charging hub, substation, car parking and landscaping;
 - Demolition of a single storey building at Collins Park and no. 2 School Road.
- 5.2 The red edge area comprises 13.58 hectares of proposed employment land and associated highway works and infrastructure. The employment land and spine road would take up around 9 hectares and provide approximately 35,000sqm of floorspace, with supporting local facilities taking up around 0.35 hectares to provide 550 sqm of retail/café floorspace. The proposal previously included 130sqm of floorspace for use as a day nursery (Class E(f)) but this has since been removed from the proposals.
- 5.3 The new spine road would run through the site, connecting Amy Johnson Way with Common Edge Road, which itself would be reconfigured along with various other highway improvements on Common Edge Road and the junctions at School Road (following the demolition of 2 School Road) and Division Lane. The highway works include removing the Jepson Way access to the Common Edge Road junction, and providing two new roads off Jepson Way, connecting the houses on Oakwood Close and Jepson Way to the new spine road. There would also be a new road between the new spine road and the car parking facilities for the new sports facilities to the south.
- 5.4 The supporting statements confirm that the spine road and other highway infrastructure is necessary to unlock land-locked sites in this part of the Enterprise Zone. It would also reduce peak time congestion on the only existing route out of the Enterprise Zone on Amy Johnson Way/Squires Gate.
- 5.5 A parcel of land adjacent Common Edge Road, along the proposed Jepson Way access is not included in the proposal but is annotated on the site layout plans as a future development site.
- 5.2 The application is been supported by:
- Air Quality Assessment
 - Planning and Heritage Statement and Addendum
 - Archaeological Assessment

- Arboricultural Impact Assessment
- Design and Access Statement
- Information in Support of Appropriate Assessment (HRA)
- Flood Risk Assessment and Drainage Strategy
- Desk Top Study and Ground Investigation Report
- Ecological Appraisal
- Bat Survey
- Noise Report
- Building Research Establishment Environmental Assessment Method (BREEAM) Pre-Assessment Report
- Framework Travel Plan
- Transport Assessment
- Public Transport Strategy
- Utilities Report
- Cricket Club Boundary Risk Assessment

6.0 RELEVANT PLANNING HISTORY

- 6.1 Given the size and nature of the site, it has a very extensive planning history, the majority of which is not relevant to this proposal. The following applications are particularly relevant:
- 6.2 20/0108 - Formation of 12 no. new natural grass sports pitches. Granted 25/08/2020
- 6.3 20/0564 - Erection of single-storey building to provide changing facilities and social room for use in conjunction with sports pitches; provision of 3G sports pitch; provision of grass pitch; provision of training area; reconfiguration and extension to existing car park; provision of associated hard-standing, fencing and landscaping; improvement works to the access from Common Edge Road/Queensway including the creation of a new footway and cycleway. Granted 10/08/2021
- 6.4 21/0272 - Erection of a two storey dwelling house and detached garage and stable with associated landscaping, boundary works, and access following the demolition of existing dwelling and buildings at 2 School Road. Granted 04/06/2021
- 6.5 22/0012 - Mixed use development- screening request.

7.0 RELEVANT PLANNING POLICY

7.1 National Planning Policy Framework

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

- Section 6: Building a strong, competitive economy
- Section 7: Ensuring the vitality of town centres
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well-designed places
- Section 13: Protecting Green Belt Land

- Section 14: Meeting the challenge of climate change, flooding and coastal change
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment

7.2 National Planning Practice Guidance

7.2.1 The National Planning Practice Guidance expands upon and offers clarity on the points of policy set out in the National Planning Policy Framework.

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

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

- CS1: Strategic Location of Development
- CS3: Economic Development and Employment
- CS4: Retail and Other Town Centre Uses
- CS5: Connectivity
- CS6: Green Infrastructure
- CS7: Quality of Design
- CS8: Heritage
- CS9: Water Management
- CS10: Sustainable Design and Renewable and Low Carbon Energy
- CS11: Planning Obligations
- CS12: Sustainable Neighbourhoods
- CS24: South Blackpool Employment Growth
- CS26: Marton Moss
- CS27: South Blackpool Transport and Connectivity

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

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

- LQ1: Lifting the Quality of Design
- LQ2: Site Context
- LQ3: Layout of Streets and Spaces
- LQ4: Building Design
- LQ5: Public Realm Design
- LQ6: Landscape and Biodiversity
- LQ10: Conservation Areas
- BH3: Residential Amenity
- BH4: Public Health and Safety
- BH5: Protection of Public Open Space
- BH7: Playing Fields and Sports Grounds
- BH16: Proposed Shopping Development Outside Existing Frontages
- BH21: Protection of Community Facilities
- DE4: Outside the Defined Industrial/Business Estates

- NE1: Development within the Green Belt
- NE4: SSSIs
- NE5: Other Sites of Nature Conservation Value
- NE6: Protected Species
- NE7: Site and Features of Landscape, Nature Conservation and Environmental Value
- AS1: General Development Requirements (transport)
- AS2: New Development with Significant Transport Implications
- AS3: Provision for Walking and Cycling
- AS5: Traffic Management
- AS7: Aerodrome Safeguarding

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

7.5.1 Blackpool Local Plan Part 2: Site Allocations and Development Management Policies has not yet been adopted. It was subject to Examination in Public between 6 and 10 December 2021 and the Inspector issued his comments in March 2022. The Council has consulted on Minor Modifications and expects to adopt the document in spring 2023. As such, significant weight can be attached to the emerging policies in accordance with paragraph 48 of the National Planning Policy Framework. The following policies are considered to be most relevant to this application:

- DM7: Provision of Employment Land and Existing Employment Sites
- DM8: Blackpool Airport Enterprise Zone
- DM17: Design Principles
- DM18: High Speed Broadband for New Development
- DM21: Landscaping
- DM25: Public Art
- DM27: Conservation Areas
- DM30: Archaeology
- DM31: Surface Water Management
- DM33: Coast and Foreshore
- DM35: Biodiversity
- DM36: Controlling Pollution and Contamination
- DM37: Community Facilities
- DM41: Transport Requirements for New Development
- DM42: Aerodrome Safeguarding

7.6 Other Relevant Policy Guidance

7.6.1 The Blackpool Airport Enterprise Zone Masterplan provides the background to the Enterprise Zone and sets out the following objectives to help deliver the vision for this Enterprise Zone:

- To meet the demand of modern businesses from a diverse range of sectors by continually adapting the Masterplan through the promotion of key character areas;
- To provide a fully connected, modern business park with enhanced infrastructure with an emphasis on sustainable transport, increased accessibility and navigation both in and around the Enterprise Zone;

- To ensure that utilities and other business critical infrastructure is competitive with other national and international locations and seek out low carbon and green alternatives where feasible;
- To main high levels of awareness and encouraging new investment through strong branding and marketing, promoting the Enterprise Zone as a leading location for inward investment;
- To provide support for new and existing companies to improve their competitiveness and create an environment where the exchange of ideas, innovation and knowledge is harnessed and shared for sustainable future growth;
- To deliver a high quality and sustainable urban environment where cutting-edge architecture is complemented with healthy, safe and connected spaces to create an interesting, active and engaged place to work and do business and;
- To protect the airport's future by supporting the ongoing operations and expansion of the airport

7.6.2 The Playing Pitch Strategy 2021 confirms that the proposed development of the Blackpool Airport Enterprise Zone will see investment in the re-provision and enhancement of football playing pitches related to Common Edge Road, Collins Park and Blackpool Amateur Football Club youth training facilities. This will involve some of the current grass pitch area remaining in situ, but the majority of pitches relocated southwards within the Enterprise Zone boundary on land within Blackpool and Fylde. The new football pitches are in place and were brought into use in 2021.

7.6.3 The Open Space Assessment Technical Report 2019 identifies open space provision and quality in Blackpool, and rates the playing fields at Common Edge as 'fair'.

7.6.4 The Blackpool Employment Land Study, June 2014, the Employment Land Update 2021, and Blackpool Airport Enterprise Zone Topic Paper 2022 set out the employment land take up so far over the plan period and the availability of employment land. The documents set out how these issues have informed the approach taken in Part 2 with respect to new employment land at the Enterprise Zone. The Blackpool Enterprise Zone Topic Paper tells the story of the Enterprise Zone to date and provides the justification for the exceptional circumstances that exist to facilitate the release of Green Belt in order to support the economic delivery of the Enterprise Zone.

7.6.5 The Local Green Belt Review Assessment 2019 sets out the rationale behind the release of Green Belt in this location.

7.6.6 Blackpool Council declared a Climate Change Emergency in June 2019 and is committed to ensuring that approaches to planning decisions are in line with a shift to zero carbon by 2030.

7.6.7 Blackpool Council adopted the Blackpool Green and Blue Infrastructure Strategy in 2019. The Green and Blue Infrastructure Strategy sets out six objectives for Blackpool in terms of green infrastructure:

- Protect and enhance green and blue infrastructure i.e. protecting the best and enhancing the rest
- Create and restore green and blue infrastructure i.e. greening the grey and creating new green and blue infrastructure in areas where it is most needed
- Connect and link green and blue infrastructure i.e. making the links, improving connectivity and accessibility of green and blue infrastructure
- Promote green and blue infrastructure i.e. changing behaviour, promoting the benefits

of green and blue infrastructure and encouraging greater uptake of outdoor activity and volunteering.

7.6.8 The National Model Design Code (July 2021) provides guidance to promote successful design and expands on the ten characteristics of good design set out in the National Design Guide.

7.6.9 The National Design Guide (January 2021) recognises the importance of good design and identifies the ten characteristics that make up good design to achieve high-quality places and buildings. The guide articulates that a well-designed place is made up of its character, its contribution to a sense of community, and its ability to address the environmental issues affecting climate.

7.7 Weight to be attached to relevant planning policies and guidance

7.7.1 Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990 require applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 219 of the National Planning Policy Framework makes it clear that existing policies of the Development Plan should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Instead, due weight should be given to them according to their degree of consistency with the Framework.

7.7.2 With regard to emerging policies, weight can be given according to the stage of preparation of the plan; the extent to which there are unresolved objections; and the degree of consistency with the National Planning Policy Framework.

7.7.3 In his Post-Hearing letter, the Inspector who examined Part 2 in public in December 2021, confirmed that he was satisfied, having considered the evidence, that exceptional circumstances exist to justify altering the Green Belt boundaries in respect of the proposed employment land, subject to the published Modifications and further consultation. The consultation on the Main Modifications ended on the 7 September 2022 and no objections have been received in relation to policies DM7 or DM8. Given that Part 2 has been through Examination and is at an advanced stage, and given the lack of objections received to the changes to the Green Belt boundary, significant weight can be given to Policy DM7 and DM8 in accordance with para.48 of the NPPF. It is anticipated that Part 2 will be adopted early in 2023.

8.0 CONSULTATION RESPONSES

8.1 Blackpool International Airport – no comments received in time for inclusion in this report. Any comments received will be reported in the Update Note.

8.2 Defence Estates (Warton safeguarding) –

8.2.1 The application site falls within the statutory safeguarding zone surrounding BAE Warton and RAF Woodvale, in particular the aerodrome height and bird-strike safeguarding zones surrounding BAE Warton. It is approximately 8.8km from the centre of the airfield and the bird-strike safeguarding zone surrounding RAF Woodvale, with the centre of the airfield lying approximately 20km away.

8.2.2 At this stage details of the size and design of the proposed development are not available and only an indicative layout and parameters for development have been provided.

However, based upon this outline information an initial technical assessment has been completed and we can provide the following advice:

- 8.2.3 The Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.
- 8.2.4 Additionally, within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate bird-strike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect, this can include landscaping schemes associated with large developments as well as the creation of new waterbodies and drainage systems.
- 8.2.5 As this is an outline application, detailed plans have not yet been submitted. The Ministry of Defence will need to complete a more detailed assessment once plans and further information become available. Once further information is submitted, the Ministry of Defence requests that it is consulted again in order to complete the necessary safeguarding assessment.
- 8.3 **Civil Aviation Authority** - no comments received in time for inclusion in this report. Any comments received will be reported in the Update Note.
- 8.4 **National Air Traffic Services Safeguarding** – National Air Traffic Services has previously responded to earlier applications advising that large-scale industrial units have the significant potential to affect its St. Annes radar, located just east of the airport. Large, flat surfaces, with a clear line of sight to the radar, are anticipated to reflect sufficient radar energy and cause false aircraft tracks. These false aircraft appearing on Air Traffic Control displays can have a detrimental impact on air traffic safety. While each proposed unit would need to be assessed on its own merits, as the impact depends on the size, location and orientation, National Air Traffic Services respectfully requests the imposition of radar mitigations conditions (condition 35).
- 8.5 **Environment Agency** - no objection to the application, subject to the inclusion of conditions.
 - 8.5.1 Contaminated land - The previous use of the proposed development site as part of Blackpool Airport and two former landfills presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon Secondary Aquifer B and there are several watercourses on site and within 100 metres of the development.
 - 8.5.2 The submitted the 'Phase 1 Geo--Environmental Desk Study' report demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will, however, be required before built development is undertaken and planning conditions are needed which require the submission of a remediation strategy (condition 5) and verification report (condition 6)
 - 8.5.3 The Environment Agency has provided advice regarding waste management legislation and contaminated waste and this advice is set out in the informatives.

- 8.5.4 This development is shown to be with 250 metres of Control of Major Accidents Hazards (COMAH) site: Calor Gas Limited, Blackpool. Our understanding is that the site is no longer operational.
- 8.5.5 The proposed development is within 250 metres of sites (waste and combustion facilities) regulated by the Environment Agency through the Environmental Permitting Regulations. Future occupants of the proposed development could be exposed to emissions associated with the regulated activity which may include odour, dust, noise, bio-aerosols or pests. The severity of these impacts will depend on factors such as the size and nature of the proposed facility; the way it is operated and managed; and/or the prevailing weather conditions. If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and the proposed development will co-exist, with the potential for some residual impacts. In some cases, such residual impacts may cause concern to occupants of the proposed development but there will be limits to the measures that the operator can take to prevent impacts from existing operations on new receptors.
- 8.5.6 Paragraphs 174 and 179 of the National Planning Policy Framework recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. It is therefore recommended that opportunities to enhance biodiversity in and around the development are identified and incorporated into the proposed development, with particular regard to the aquatic environment, in accordance with the latest Planning Practice Guidance on how biodiversity net gain can be achieved.
- 8.5.7 We advocate the use of sustainable drainage systems to manage surface water run-off as they can perform multiple benefits. Sustainable drainage systems manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, sustainable drainage systems retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces. Sustainable drainage systems involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they will provide multiple benefits and will reduce costs and maintenance needs. Sustainable drainage systems should always be carefully considered in discussions with the Lead Local Flood Authority. However, any drainage system must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination.
- 8.5.8 Developers should incorporate pollution prevention measures to protect ground and surface waters. Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking / servicing areas should be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained (condition 8). However, vehicle wash-down water and detergents should not be passed through any interceptor.
- 8.6 Natural England** - No objection subject to appropriate mitigation being secured.
- 8.6.1 Without appropriate mitigation, the application would have an adverse effect on the integrity of Ribble and Alt Estuaries Special Protection Area, Ribble and Alt Estuaries Ramsar site and Liverpool Bay Special Protection Area and damage the interest features for which

the Ribble Estuary Site of Special Scientific Interest.

- 8.6.2 In order to mitigate these adverse effects and make the development acceptable, surface water drainage, management and pollution prevention measures should be secured by condition (conditions 6 and 8).
- 8.6.3 Natural England notes that the Habitats Regulations Assessment has not been produced by Blackpool Council, but by the applicant. As a competent authority, it is the Council's responsibility to produce the Habitats Regulation Assessment and be accountable for its conclusions. We provide advice on the assumption that Blackpool Council intends to adopt this Habitat Regulation Assessment to fulfil your duty as competent authority.
- 8.6.4 Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measure proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England concurs with the conclusions in the appropriate assessment, providing that all mitigation measures are appropriately secured in any planning permission given (condition 20).
- 8.6.5 Natural England advise that any future proposals that are a part of this scheme which include residential development will have likely significant effects and will be required to be taken through to the appropriate assessment stage.
- 8.6.6 Officer Note – the Council has already adopted the Habitats Regulation Assessment.
- 8.7 Sport England** - Sport England initially objected to the application on the 19 May 2022 and that objection can be read in full on the Council's website. Following the submission of further details, Sport England removed their objection, subject to a condition that, other than essential infrastructure associated with the new spine road and any works to the highways, development does not commence until the playing fields and sports facilities which benefit from planning permission on land to the south of the application site have been implemented in full and are made available for use (condition 4). Sport England concluded that subject to that condition, the proposal meets Exception 4 of their Playing Fields Policy and criteria in paragraph 99 of the National Planning Policy Framework.

8.8 Health and Safety Executive

- 8.8.1 HSE is a statutory consultee for certain developments within the consultation distance (of major hazard sites and major accident hazard pipelines. Part of the application site is within the inner, middle and outer consultation zones for a major hazard site, the Calor Gas Unit at Squires Gate Industrial Estate. It is understood that the Calor Gas site still holds hazardous substance consents granted by Blackpool Borough Council in 1999 and 2001 (refs 99/0349 and 01/0317 respectively). The owner of the land could legally reintroduce the hazardous substances at a later date unless the consent was formally revoked in the meantime.
- 8.8.2 The Health and Safety Executive does not advise against approving the application on the understanding that the Hazardous Substances Consent is revoked and that this is a required by condition (condition 9).
- 8.8.3 Following the revocation of the Hazardous Substances Consent, the consultation zones would be removed from the area.

8.9 United Utilities

- 8.9.1 United Utilities will not allow building over or in close proximity to a water main and may not allow building over or in close proximity to a public sewer. According to United Utilities' records there are two easements in the vicinity of/close to the proposed development site which is in addition to their statutory rights for inspection, maintenance and repair. The easement dated 05/08/1970 United Utilities Ref: R703 and easement dated 14/09/1962 United Utilities Ref: F3016 has restrictive covenants that must be adhered to. A large diameter trunk main crosses the site. It must not be built over, or our access to the pipeline compromised in any way. The cost of diverting any assets will be borne by the developer.
- 8.9.1 Following a review of the submitted Flood Risk Assessment and Drainage Strategy, prepared by Wilde, Ref: 700-109 Revision P1, Dated March 2022, UU have confirmed that whilst the proposals are acceptable in principle, there is insufficient information on the detail of the drainage design. United Utilities have requested the imposition of a standard drainage condition and a drainage maintenance and management condition (conditions 15 and 16).

8.10 Greater Manchester Ecology Unit (GMEU)

- 8.10.1 The Preliminary Ecological Appraisal found the majority of the site to support habitats of low ecological value. The proposals will involve the loss of some trees and it is stated that "Any trees removed should be replaced elsewhere on Site and will be covered by the proposed landscape plan". The loss of low value grassland on the site will also result in loss of biodiversity, so any landscaping plans should be designed to demonstrate a net gain for biodiversity, in line with the requirements of the National Planning Policy Framework.
- 8.10.2 Surveys of the buildings on site found no evidence of bats at the time of survey and that the "demolition of the buildings is unlikely to result in adverse impacts upon roosting bats". However bats are highly mobile and Greater Manchester Ecology Unit has requested that an informative is attached to any permission, reminding the applicant of their responsibilities under the Conservation of Habitats and Species Regulations 2019 in relations to Bats, and advising what should be done if a bat is found during demolition of any buildings on the site.
- 8.10.3 No evidence of other protected species was found on site but habitat suitable for use by amphibians, hedgehog and reptiles is present. A number of precautionary measures are recommended to prevent harm to these species.
- 8.10.4 The Greater Manchester Ecology Unit has recommended a condition to secure biodiversity mitigation and enhancement measures (condition 21) and a Construction Environmental Management Plan (condition 19). In response to planning application 20/0564 (for the changing facilities and 3G pitch etc to the south of the application site), the Greater Manchester Ecology Unit recommended that the Council adopt the submitted Habitats Regulation Assessment, which the Council did on the 7 August 2021.

8.11 Lancashire County Council (Archaeology)

- 8.11.1 This application is accompanied by an archaeological desk-based assessment which has a number of mistakes and omissions and is considered to underplay the potential for prehistoric to medieval activity to have occurred here on the fringes of Marton Moss. The site is located on gently rising ground on the west side of the former moss, between the edge of the unenclosed moss shown on William Yates map of 1786 (desk-based assessment Fig 3, not dated 1769 as per desk-based assessment bibliography) and the former water

body of Black Leach shown on the 1767 enclosure map and other mapping (desk-based assessment Plate 1, Fig 2, 6). It should be noted that the 'reproduction of a 17th century map' provided as Plate 2 is certainly not of that date, although it may have been drawn up by Clarke from information of that period but is clearly very general and inaccurate when compared to other maps, in contrast to what is implied in the desk-based assessment (section 3.2.23). Recent excavations near Poulton-le-Fylde (desk-based assessment 3.2.7) have recovered evidence for settlement and ritual activity of Mesolithic to Romano-British dates, as well as a small medieval settlement site. Prior to the field investigations, their potential for remains of these periods was unknown.

8.11.2 It is notable that the site of the Black Leach waterbody seems to be 'perched' above lower land to its east, using the contours and spot heights on the OS 1:10,560 mapping of 1848, sheet Lancashire 59, (desk-based assessment Appendix 2) and that there is a distinct change in the historical field patterns east and west of Moss Edge Lane (now Common Edge Road) shown on that map. These issues probably should have been considered further.

8.11.3 However, that the recent history of the site as a series of sports pitches is likely to have badly impacted any archaeological remains which may have survived up until this point (desk-based assessment 3.4.4). It is possible that there are more remains of WWII date in the vicinity, associated with the defences of the airfield – the known pillboxes are merely the most obvious remains – or the Vickers shadow factory. Such remains are not, however, particularly rare and we would reluctantly agree that further archaeological fieldwork cannot be justified.

8.12 National Highways - National Highways have no objection to this application.

8.13 Lancashire County Council (Highways)

8.13.1 Lancashire County Council has previously recommended that the application is not presented to the Planning Committee until further information is presented. However, the department head has since acknowledged that the application is made in outline with all matters reserved, meaning that details of the access can be agreed at a later date. Whilst the plans submitted thus far are not agreed, it is accepted that it will be possible to deliver a safe and appropriate access for the proposal. As such no objection is raised on the proviso that any outline permission granted makes allowance for details of the access arrangements and highway works to be further developed and agreed.

8.13.2 Their comments are summarised below:

- The drawings do not include road markings.
- Key elements of the access are covered by labels.
- The access on Common Edge Road is not within Lancashire County Council's adopted highway but will have implications for the Lancashire County Council adopted Highway.
- The new junction layout looks overly complicated and there are opportunities to simplify the layout which should be considered.
- Questioning the modelling parameters that have been used to assist in the design development of the layout.
- It is unclear if a Stage 1 safety audit has been undertaken.
- Seeks clarification on the cycle routing along the east side – cycle provision is not continuous.
- Swept Path Analysis for all turning movements are required.
- Site access egress – right turns could block this lane.

- Site access is very close to junction access for the area that is excluded from the red edge – a short right turn pocket would be necessary.
- Garden centre access – right turn would have to cross 4 lanes of traffic and this is a safety issue.
- Can two right turn pockets into the garden centre satisfy HGV/delivery/servicing needs?
- Access to/from 300-360 Common Edge Road – servicing/delivery/waste needs to be satisfied with safe and suitable provision.
- The widths of the carriageway have not been specified and no visibility splays have been provided.
- All future traffic assessments will need to be considered using fully updated traffic data and assessment.
- Measures need to be identified to limit impact of re-distribution on to less appropriate routes, in particular School Road and Division Lane.
- The J12: Queensway / Kilnhouse Lane junction has not been assessed as less than 30 two-way trips generated at junction. This important junction needs to be modelled, further discussion is necessary to agree what is needed.
- Further discussion is necessary to agree the modelling approach needed at J13: Lytham St Annes Way / Whitehill Road / Wild Lane (M55 to Heyhouses Link Rd) / School Road / Cropper Road.
- The Indicative Plot Layouts plan shows footpath along the proposed link between the proposed link road and the sport facilities' car park, but this is not consistently shown in all drawings.
- The current phasing proposals would only see the new access with Common Edge Road delivered in the last phase (Phase 5). The access to Common Edge Road should be delivered earlier than indicated to deliver improved public transport accessibility.
- Travel Plans will be required for all elements of the development.
- The Car Park Management Strategy associated with the sports pitches to the south of the application site needs to be updated and should be the subject to a condition on this application.
- It will be expected that the developer will confirm commitment to s106 funding. At this time no funding has been explicitly agreed, however, it is expected that funding will be agreed to cover the following: - funding for Public transport service improvements to serve the site; - scheme / measures to limit impact of re-distribution onto less appropriate routes, in particular School Road and Division Lane (East), (The scheme or its delivery mechanism has not yet been agreed, s106 / s278) and funding necessary to support measures to monitor and deliver the agreed Car Park Management Strategy for the sports pitches.

8.14 Head of Transportation

8.14.1 I have no objection to the proposal as now presented. It has been under discussion, as a future phase of the Enterprise Zone and as an application in its own right, for some time. The proposal is in outline. However, the preparation of the greater proportion of the external highway works is progressing.

8.14.2 The works on existing highways are at an advanced stage of preparation for the relevant Highways Act agreements. These works, together with County Council schemes nearby will both accommodate Enterprise Zone expansion traffic and bring significant relief to the area as well as better spreading the flows into and from the Enterprise Zone between the Squires Gate Lane accesses and Common Edge Road.

- 8.14.3 The layout of the roads linking the estate to the existing highway network is, similarly, at an advanced stage of preparation.
- 8.14.4 The layout of the additional developments, roads and individual accesses within the Enterprise Zone has been the subject of discussion and amendments have been made. The traffic generation arising from these various proposed developments has been correctly reflected in the Transport Assessment.
- 8.14.5 Public transport demand has been estimated and options are being considered for services to and through the site. Clearly, the timing of such progress would depend on the completions of infrastructure schemes. Discussions have been held with a view to developing a more detailed approach to the service provision.
- 8.15 Electricity North West** – No comments have been received in time for inclusion in this report. Any comments will be reported in the Update Note.
- 8.16 Police Architectural Liaison Officer:** security recommendations such as height barriers to car parks, climb proof fencing details, access controlled gating systems, car parks to meet ‘parkmark’ specifications, CCTV requirements and site security measures during construction phases.
- 8.17 Fylde Borough Council** - No comments have been received in time for inclusion in this report. Any comments will be reported in the Update Note. Fylde Council have a corresponding planning application (reference 22/0267).
- 8.18 Built Heritage Manager** - No objection to the proposals, but has made the following comments:
- 8.18.1 The site forms the setting of the Marton Moss Conservation Area. The views west are relatively open and, although not forming part of this application, the new buildings should be low level at least at the eastern edge of the site, and screening trees should be provided to soften the outlook.
- 8.18.2 School Road is an historic route and is therefore relatively narrow, and also has a primary school on the north side. Traffic calming measures are already in place at the west end, but the proposed widening at the junction implies its role as a secondary route may be put under more pressure. As such further safety measures, and improvements to the road surface which deteriorates to the east, will be required. Increased heavy traffic will have an impact on the semi-rural character of the conservation area so if some restrictions or redirections could be included to mitigate this, such as limits on the size of vehicles, that would be helpful.
- 8.19 Blackpool Civic Trust:** No objections or issues raised.
- 8.20 Council’s Drainage Officer:** The flood risk assessment and information provided is acceptable.
- 8.21 Environmental Protection**
- 8.21.1 A Phase 2 report is required in order to show that the historic land uses on the site will not have a health impact on site users and site workers. There are high levels of methane gas in some boreholes that need further investigation and gas membranes will be required.

Following the installation of any gas protection membrane a full detailed inspection should be undertaken by a competent qualified, independent practitioner to demonstrate the membrane has been installed correctly and will prevent the transfer of ground gas into the building (condition 7).

- 8.21.2 In terms of noise, care must be taken to ensure the existing background sound level is not exceeded and all future reports for reserved matters must use the baseline background data identified within the submitted Wardell Armstrong Noise report, GM10226-0020/FINAL, March 2022. If the reserved matters applications are submitted in phases, they must take account of the any previous phases when considering the impact of the development. At this stage there has been insufficient information presented on the impacts from the industrial/commercial noise sources to allow a thorough consideration of the acoustic impact of the development. A condition requiring the submission of further acoustic reports at each reserved matters phase/application is required for the industrial/ commercial elements (condition 13).
- 8.21.3 An Air Quality Assessment has been produced for the development, based on the submitted Traffic Assessment. Should the Traffic Assessment change then the Air Quality Assessment may need to be re-done. The Air Quality Assessment has considered both the construction phase and the operational phase of the development; although no detail design or class use for the site has been determined the basis of the traffic movements will need to be confirmed at each reserve matters stage.
- 8.21.4 The report concludes that there will not be an adverse impact on existing or proposed sensitive receptors following an ADMS-model assessment. However, the development will result in additional trips and as such will result in a negative impact on air quality within the area and as such suitable mitigation measures are required. As a minimum electric vehicle charging points, secure cycle storage (not hoops in the ground) and adequate changing facilities are required (conditions 26, 27 and 28). These must be detailed as part of the reserve matters application.
- 8.21.5 In addition, an assessment of the damage costs associated with the development from increased vehicle movements should be undertaken for each phase and associated mitigated measures included commensurate with these damage costs. A suitable assessment methodology can be discussed and confirmed prior to each reserve matters application.
- 8.21.6 No information on external lighting has been provided. A full lighting scheme should be submitted for each phase of the development at the reserve matters stage. The lighting assessment be required by condition (condition 33) and should include;
- Levels of over the development phase,
 - Overspill lighting
 - Upward Lighting Ratio
 - Glare on neighbouring properties, including roadways across the full development phases.
- 8.21.7 As an outline application there is limited information available on the design of the new buildings, however given the Council's commitment to net-zero in 2030 all reserve matters applications should include a consideration of energy efficiency, the impact on the climate and the possibilities for renewable energy generation, reduction in water usage, grey water systems and as a whole district heating options (conditions 17 and 18)

8.21.8 An active Hazardous substance consent and Control of Major Accidents Hazards site is identified within the proposed development. However, it is understood that the sites are no longer in operation, as such confirmation that these consents will be surrendered is sought should the application be granted are requested (condition 9).

8.22 Head of Parks - The arboricultural report covers the requirements for the site. There is a great opportunity to place a tree avenue along the proposed Spine Road and tree avenues linking with the new/existing roads as the football pitches provide areas for planting which would link the entire area together.

8.23 Marton Moss Neighbourhood Forum

8.23.1 The Forum would like to raise the following points, bearing in mind the removal of the corner house on School Road and the changes to the road on the east side of Common Edge Road are in a Conservation Area:

8.23.2 An increase and enforcement of 7.5 ton limit. We have been asking for 3 years now, for the appropriate paperwork to be done so enforcement can take place by the police. There is an ever increasing amount of HGV traffic on this road, as drivers ignore the 7.5T limit signs. We have spoken with the Chief Constable, but there is little that can be done until the paperwork is correct. There is a traffic problem, at school arrival and leaving times, HGV's at these times cause chaos as they cannot get through and the whole road stops. It is also not good to have heavy diesel, on a road that has a primary school playground next to the road.

8.23.3 Ensure the alterations at School Road does not encourage additional traffic.

8.23.4 Without a detailed plan it is hard to be sure, but we want to ensure the current residents of Common Edge have access to reserved parking, footpaths and safe entrance and exit to their homes.

9.0 REPRESENTATIONS

9.1 Press notice published: 05/05/2022 and 06/09/2022.

9.2 Site notice displayed: 28/04/2022 and 01/09/2022.

9.3 Neighbours notified: 28/04/2022 and 01/09/2022.

9.4 Following some minor amendments to the red edge, it has been necessary to do a full re-consultation. The statutory 21 day consultation period ends on 27/09/2022. Any further representations received will be reported through the Update Note.

9.5 Representations have been received from 7 Oakwood Close, 322 Common Edge Road, and nos. 1 and 3 School Road.

9.6 These representations raise the following points:

- This new scheme is detrimental to the area and spoils the character of the Moss – School Road is a designated Conservation Area and a designated heritage asset.
- This scheme will take away our open aspect of the area when you build the proposed houses on the Collins Park football pitch.
- The houses on Common Edge Road with no off-street parking struggle to park on the

slip road.

- Cars would not be able to pass each other on the slip road when the new road design is implemented, resulting in cars mounting the grass verge and the lane if full at school pick up and drop off times.
- Heavy vehicles will be nearer to the houses which can currently feel the vibrations of heavy traffic.
- School Road is not appropriate for HGVs.
- This entrance/ exit to the Enterprise Zone should be on Squires Gate Lane where it is a dual carriage way and is connected to the M55 motorway.
- Common Edge Road is also well over 100% capacity and will not improve when the M55 Link road is finished from St Annes to Cropper Road roundabout.
- The traffic along School Road is already excessive and inappropriate given its road categorisation and the close proximity of a primary distributor route which should be taking more of the traffic.
- School Road/Common Edge Road/Jepson Way is already operating way over its capacity at all the monitored times, whereas the junction at Squires Gate Lane/Amy Johnson Way/St Annes Road operates within capacity at all times. The wide traffic light junction at Squires Gate Lane Industrial Estate is already in place and ideal for heavy traffic and HGV's. The logical conclusion from this would be to make more use of Progress Way and Squires Gate Lane.
- The proposal would impact on highway safety, particularly at school pick up/drop off times and make entering and exiting properties on School Road more dangerous.
- The proposal will cause more noise, air pollution and disruption to the area from increased traffic queues and more buildings.
- The proposal will devalue our properties.
- Creating an access point to the Enterprise Zone from Common Edge Road will result in traffic from the M55 and the A583 using School Road to get to the Enterprise Zone due to Sat Nav.
- Emerging Policy DM8 states that 'the connectivity to the local road network will be improved with an additional highway junction on Squires Gate Lane'. This has been disregarded.
- The removal of the Park and Stride car park on Common Edge Road, (when the new houses are built, as per the Local Plan Part 2), will make traffic worse at school pick up and drop off times
- There is no indication on the plans, where the nursery would be located. The training pitch at the rear of 5-9 Oakwood Close would be appropriate to locate the nursery and associated play space
- The closure of Jepson Way junction would cause residents of Oakwood Close an extended journey to their homes.

9.7 Officer response:

- 9.8 The proposal to provide a nursery is no longer being pursued, this application does not include residential development and property values are not a material planning consideration. Policy DM8, in the supporting text at 3.92, it states that 'Whilst the site is well located, its accessibility and connectivity to the local road network will be improved, with additional highway junctions on Squires Gate Lane and Common Edge Road, to further access the site and support its delivery.' Future phases may well include an additional junction at Squires Gate Lane, but this is not included in this application. The other issues raised will be discussed in the assessment section of this report.

10.0 MAIN PLANNING ISSUES

10.1 The application is in outline form with all matters reserved. The main consideration in this application is therefore the balance between the protection of Green Belt, public open space and playing pitches and the principle of developing this site for employment and associated uses. Although the matter of access is reserved, the principle of how the site could be accessed along with any mitigation to ensure that there would be no unacceptable impact on highway safety or any severe cumulative impact is also an important planning issue.

10.2 In light of the planning policy context and the nature of the application, site and location, the assessment section of this report will be structured as follows:

- Environmental Impact Assessment considerations
- Format of the application
- Acceptability in Principle of Employment Use
- Development in Green Belt
 - Assessment of Impact
 - Demonstration of Very Special Circumstances
- Loss of Playing Fields and Public Open Space
- Provision of ancillary retail and leisure uses
- Marton Moss
- Heritage Impacts
- Archaeology
- Traffic and Transportation
- Environment
- Ground Contamination and Water
- Noise
- Air Quality
- Residential Amenity
- Flood risk and drainage
- Climate change and sustainable design
- Ecology and nature conservation
- Visual Impacts
- Sustainability and planning balance appraisal

11.0 ASSESSMENT

11.1 Environmental Impact Assessment

11.1.1 The Environmental Impact Assessment Regulations set out categories of development for which an Environmental Impact Assessment Regulations is mandatory (Schedule 1) or may be required (Schedule 2). If a proposed project is listed in Schedule 2 and exceeds the relevant thresholds or criteria as set out in Schedule 2, the proposal needs to be screened by the local authority to determine whether significant environmental effects are likely and hence whether and Environmental Impact Assessment is required. The Local Planning Authority must also consider if any part of a development (that is listed in Schedule 2) is to be carried out in a sensitive area as defined by the Environmental Impact Assessment Regulations. The proposed development is not located within a sensitive area. The majority of the proposed development falls within Schedule 2 Category 10(a) 'Industrial estate development'. The site area exceeds 0.5 hectares and is therefore considered to be Schedule 2 development.

- 11.1.2 As such, a Screening Opinion (Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended) was requested from the Council in January 2021 (ref 22/0012), to determine whether an Environmental Impact Assessment of the proposal is required.
- 11.1.3 A breakdown of the maximum parameters for the internal floorspace for each employment use class proposed was provided, as different uses would yield different traffic flows and could therefore impact on the local transport network in different ways.
- 11.1.4 The agent confirmed that the 35,000 sq.m employment use, would be broken down as follows:
- 3,500 sq.m Business Use Class E (10%)
 - 17,500 sq.m General Industrial Use Class B2 (50%)
 - 14,000 sq.m Storage and Distribution Use Class B8 (40%);
- 11.1.5 On the basis of this additional information, the Screening Opinion concluded that the proposal is not considered to give rise to any likely significant effects and is not considered to be 'Environmental Impact Assessment development'. The proposed development at the Enterprise Zone does not need to be subject to further Environmental Impact Assessment.
- 11.1.6 Similarly, on the basis of this quantum of floorspace for each Use Class, the Transport Assessment concluded, that under the guidelines set out in the National Planning Policy Framework, the proposals represent sustainable development and should be acceptable in highways terms.
- 11.1.7 A condition (condition 3) is therefore necessary to restrict the amount of floorspace for each Use Class to:
- 3,500 sq.m Business Use Class E (10%)
 - 17,500 sq.m General Industrial Use Class B2 (50%)
 - 14,000 sq.m Storage and Distribution Use Class B8 (40%)
- 11.1.8 Any variation to this quantum of floorspace would need to be assessed in a revised Screening Opinion and Transport Assessment.

11.2 Format of the application

- 11.2.1 The application is made in outline only and matters of access, appearance, landscaping, layout and scale reserved for future consideration.
- 11.2.2 Submitting an application with all matters reserved maximises flexibility. Were the exact positions and heights of buildings etc to be confirmed at this stage, further planning applications would be required to make any substantive changes should the proposals evolve over time. This could result in delays to delivery. The Council could apply conditions at this stage to control the quantum of floorspace or the maximum heights of buildings, and would retain control over these matters through future Reserved Matters applications.
- 11.2.3 The submitted indicative plot layout plan and link road plan indicates the broad layout and illustrates the vision for the wider site including access through the site and how the plots could be laid out. Whilst the application does not seek to agree these in detail, it shows what could be achieved and how the site could work and respond to the requirements of emerging Policy DM8 and the Enterprise Zone Masterplan.

- 11.2.4 On this basis, given the amount of illustrative material provided, the format of the application is considered to be adequate to enable a sufficiently robust assessment of the way in which the scheme would comply with the Development Plan.
- 11.2.5 As such, the application being in outline form with all matters reserved is considered to be appropriate in this instance.

11.3 Acceptability in principle of Employment Use

- 11.3.1 Sustainable development is at the heart of National Planning Policy Framework and Section 2 identifies three overarching objectives, including ‘an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure’
- 11.3.2 Section 6 of National Planning Policy Framework provides guidance on building a strong, competitive economy and at paragraph 81 states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 83 confirms that planning decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 11.3.3 The 2013 Blackpool Employment Land Study is a key evidence base document for the Core Strategy and provides an overview of the local economy/property market; analyses existing employment land and available land supply; assesses how much employment land is needed to 2027; and identifies how this need will be met. It informed the strategic policies in the Core Strategy, specifically policies CS3: Economic Development and Employment and CS24: South Blackpool Employment Land.
- 11.3.4 The Economic Land Study and Duty to Co-operate Memorandum of Understanding identify lands at South Blackpool on the Blackpool/Fylde boundary as the most appropriate location to attract major new economic development, providing sustainable jobs for Fylde Coast residents and supporting sub-regional employment growth. This includes redevelopment opportunities on existing employment sites within Blackpool as well as new development on wider land in neighbouring Fylde.
- 11.3.5 The Vision and several goals in the Core Strategy, hinge upon strengthening the economy, encouraging aspiration and ambition, sustainable communities with wider access to quality jobs and supporting economic growth along the Blackpool Airport Corridor.
- 11.3.6 Core Strategy Policy CS1 clearly identifies South Blackpool as a location for strategic development to help meet wider housing and employment needs.
- 11.3.7 Core Strategy Policy CS3: Economic Development and Employment highlights that sustainable economic development will be promoted to strengthen the local economy and meet the employment needs of Blackpool and the Fylde Coast Sub-Region to 2027. One of

the focuses of CS3 is safeguarding around 180ha of existing industrial/business land for employment use and enhancing these sites with new employment development. A second focus of CS3 is promoting land in South Blackpool as a strategic priority, to help strengthen the Fylde Coast economy and make an important contribution towards meeting the future employment needs of Blackpool residents.

- 11.3.8 At paragraph 5.42 of the supporting text to CS3, it is acknowledged that developing lands along the Blackpool Airport corridor and surrounding existing business areas to deliver sustainable development is critical to capitalise on this major economic asset.
- 11.3.9 The 2013 Employment Land Study identified a shortfall in employment land supply of 13.7ha which resulted in Fylde Borough Council allocating an additional 14 hectares of employment land within their adopted Local Plan to meet Blackpool's future needs.
- 11.3.10 The Employment Land Update 2021 and Blackpool Airport Enterprise Zone Topic Paper (February 2022) sets out that the loss of the National Savings and Investment site on Preston New Road for housing development and the Aldi at Squires Gate Industrial Estate have resulted in the loss of around 3.6ha of employment land since the start of the Plan period. In 2021, Blackpool had 172.5ha of safeguarded employment land. The additional employment land that is proposed at the Enterprise Zone would ensure that around 180ha (181.9ha) of employment land would continue to be safeguarded in line with Policy CS3 and would present opportunities for quality employment development to help meet Blackpool's future employment needs and support sub-regional growth.
- 11.3.11 Policy CS24: South Blackpool Employment Growth focusses on development along Blackpool Airport Corridor, which includes the Blackpool Airport Enterprise Zone. The policy states that the Council will support proposals for major new business/industrial development in principle at sustainable locations within wider lands at South Blackpool to support sub-regional economic growth, including Blackpool Airport Corridor. The Enterprise Zone clearly aligns with the strategic policies highlighted above in terms of its location within a strategic priority area in the south of the borough in an area clearly identified to deliver South Blackpool Growth.
- 11.3.12 Additional employment land associated with the Enterprise Zone designation (including the application site) is identified in emerging Policy DM7, bringing the available land for development on the Enterprise Zone to 16.1ha. Emerging Policy DM8 (as Modified) states that the Council supports the sustainable development of the Enterprise Zone to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution to national growth. To enable the objectives of the Enterprise Zone to be delivered, DM8 amends the Green Belt boundary to release around 9ha of land (included within the application site) to allow the first phase of development to be undertaken by 2027. Emerging Policy DM7 (as Modified) confirms that the employment land at the Enterprise Zone includes around 9ha of land released from the Green Belt.
- 11.3.13 Policy DM8 supports target sectors comprising energy industry, advanced manufacturing and engineering, aviation and aerospace, food and drink manufacture and the digital and creative sector. Outside the target sectors other B2, B8 and E(g) uses will be acceptable where they promotes job creation and industry diversification, provided it does not compromise the development of the target sectors. DM8 allows supporting facilities and services within the application site, including 275m² convenience store, 275m² café or

sandwich shop, a childrens day nursery, a new link road through the site and associated highway improvements, to provide an eastern gateway to the Enterprise Zone.

11.3.14 Following operational commencement of the Enterprise Zone in 2016, a Memorandum of Understanding was agreed between the then Secretary of State for Communities and Local Government, Blackpool Council, Fylde Borough Council and the Lancashire Local Enterprise Partnership. That Memorandum of Understanding states that it is recognised that the Enterprise Zone will become a critical asset, both in revenue and economic terms, for local partners and the Lancashire Local Enterprise Partnership. This document also confirmed the agreed capital expenditure required to open up the Enterprise Zone for development, which included a new eastern access road to link Amy Johnson Way to Common Edge Road, sustainable drainage systems and the relocation of the sports pitches on the site. As such, it is evident from inception that the development of this part of the Enterprise Zone (subject to this planning application) was acknowledged as being required for development purposes to facilitate its operation. Clearly, in designating the Enterprise Zone in 2015, the Government considered that the Airport corridor was a suitable and sustainable location for employment growth and the proposals align with the Governments levelling up agenda. The Enterprise Zone has already delivered approximately 1400 jobs since 2016 and a further 600 jobs are anticipated as a result of this proposal. Significant shorter-term employment opportunities would arise during the construction phases and it is anticipated that future phases of Enterprise Zone development along the airport corridor will deliver further employment opportunities and deliver further socio-economic benefits.

11.3.15 In addition, in 2020, Blackpool was connected to the North Atlantic Loop via a transatlantic sub-sea fibre optic cable, which connects the USA and Europe. The landing station is at the Enterprise Zone meaning that the Enterprise Zone has the capacity to deliver the fastest, most resilient, high-speed internet, with speeds of less than 0.06 seconds from Blackpool to New York. This makes the Enterprise Zone uniquely placed to attract cutting-edge, digital and data industries, which would assist in diversifying the local economy and present skilled employment opportunities. However, development opportunities within Enterprise Zone are currently limited as there are few plots left to develop, making the application site critical if the Enterprise Zone is to take full advantage of its position and fulfil its employment and economic growth potential.

11.3.16 It is considered that the range of uses proposed in this application is consistent with the established uses in the Enterprise Zone. The proposal for employment and supporting uses and essential infrastructure would clearly meet the objectives of the Enterprise Zone designation and the economic objectives set out in the National Planning Policy Framework and the adopted and emerging Local Plan Policies referenced above.

11.3.17 The building footprints shown on the indicative plot layout indicate how around 25,000 sqm of floorspace could be accommodated on the site. The application is for 35,000 of floorspace to allow for flexibility in relation to the inclusion of mezzanine levels.

11.4 Loss of Green Belt – assessment of impact

11.4.1 Policy CS6 states that there is no planned strategic review of the existing Green Belt Boundary during the plan period. The Enterprise Zone was designated after the Core Strategy was adopted although most of the Enterprise Zone has an existing employment use designation under the Saved Local Plan. The Masterplan includes this small area of green belt located within the Enterprise Zone. In response to this designation, a Green Belt Review Assessment was undertaken in 2019 which confirms that this parcel of Green Belt appears to

'punch' into the existing urban area and is surrounded to the west and north by established business/industrial sites and to the east, by Common Edge Road. The Assessment states that this parcel of land does not meet the specific purpose of the Green Belt in that it is surrounded by urban development on 75% of its boundaries and does not play a role in separating neighbouring towns. It concludes that the removal of the Green Belt designation will not affect "the gap" between Blackpool and St Annes. As such, emerging Policy DM8 as Modified alters the boundary of the Green Belt to release around 9 hectares to allow employment development and supporting uses and critical infrastructure to come forward on the application site.

- 11.4.2 In his Post Hearing letter, the Inspector who examined Part 2 in public in December 2021, confirmed that he was satisfied, having considered the evidence, that exceptional circumstances exist to justify altering the Green Belt boundaries in respect of the proposed employment land, subject to the published Modifications and further consultation. The consultation on the Main Modifications ended on the 7 September 2022 and there are no unresolved objections in relation to policies DM7 or DM8. Given that Part 2 has been through Examination and is at an advanced stage, and the lack of objections received to the changes to the Green Belt boundary, significant weight can be given to Policy DM7 and DM8 in accordance with para. 48 of the National Planning Policy Framework.
- 11.4.3 Given the time sensitivity of progressing the site; the amount of associated infrastructure that is needed; the amount of contaminated land to remediate; and the time-sensitive funding restrictions in place, the application has been submitted in advance of the adoption of Part 2. As such, and notwithstanding the support for the proposal in principle in Policies CS3, CS24 and emerging policies DM7 and DM8, the site is still currently designated Green Belt until such time that Part 2 is adopted. This is anticipated to happen in the first quarter of 2023. It is not anticipated that any substantive development would take place in advance of the adoption of Part 2, given the outline nature of the application and the need discharge conditions. In any case, the highway works and spine road would be delivered before any buildings are constructed and highway works and new road infrastructure can be considered appropriate development in the Green Belt.
- 11.4.4 Green Belts are areas around certain towns, cities and large built-up areas, where the aim is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Land is not included in Green Belt due to its landscape or ecological value.
- 11.4.5 Saved Policy NE1 relates to Green Belt and states that planning permission will not be given for the construction of new buildings or change of use of existing buildings other than for agriculture or appropriate uses in the rural area, essential facilities for outdoor sport/recreation and limited extensions, alterations or replacement dwellings. Reference is also made to Green Belt in Core Strategy Policy CS6: Green Infrastructure. At point 1a it states that 'in terms of Green Belt areas, the Council will apply national policy to protect their openness and character, and retain the local distinctiveness'. Section 13 of the National Planning Policy Framework relates to Green Belt.
- 11.4.6 The National Planning Policy Framework confirms that Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban

land.

- 11.4.7 For the purposes of altering established Green Belt boundaries, the NPPF states that this should only occur where **'exceptional circumstances'** are fully evidenced and justified. The Local Plan Inspector has accepted that exceptional circumstances exist in changing the Green Belt boundary. However, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and only grant planning permission for inappropriate development under **'very special circumstances'**. Very special circumstances will not exist unless the potential harm to the Green Belt, by virtue of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 11.4.8 Para. 149 of National Planning Policy Framework describes inappropriate development in the Green Belt as the construction of new buildings other than buildings for agriculture and forestry, outdoor sports and recreation facilities, cemeteries, allotments and some limited infilling. Certain other forms of development may not be inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it.
- 11.4.9 The supporting retail and café uses and electric vehicle charging hub proposed, fall within the existing business park in the west of the site are not in the Green Belt. The proposed spine road, highway and drainage works within the Green Belt could be considered as appropriate development if justified and depending on whether it would preserve the openness of the Green Belt and its function. However, clearly any business, industrial and warehousing buildings would be inappropriate development, and inappropriate development is, by definition, harmful to the Green Belt. As such, very special circumstances would need to be demonstrated which outweigh the harm to the Green Belt, for the development to be acceptable in principle.
- 11.4.10 In spatial terms, the proposal would inevitably result in harm to the openness of the Green Belt through the introduction of larger scale buildings on the application site. However, the site would be viewed against a backdrop of other large-scale development to the north and west, and smaller-scale development to the east. Furthermore, the land to the south now contains new sports facilities approved under previous planning applications, along with the main runway for Blackpool Airport, making the nature of the site very well-contained. Furthermore, the proposed indicative plot layout plan indicates that the nearest large-scale buildings to Common Edge Road would be between 80m and 110m away and contained behind a landscaped buffer. As such, there would be limited and localised harm to the openness of the Green Belt.
- 11.4.11 Fylde and Blackpool would still be separated by a very clear and distinct area of Green Belt and the airport runway which would still act as buffer between the two settlements.
- 11.4.12 The nature of the site is very contained and would reduce the Green Belt between Fylde and Blackpool by less than 3%. The extent of built development would not go any further to the south than the existing development to the east and to the west and, once development is complete, could not be described as urban sprawl, would not reduce the gap between Blackpool and Fylde and would simply 'square off' the south east corner of the Enterprise Zone. The site is not a designated countryside area, it has the appearance of an urban fringe site and the development would appear more as an infill than encroachment into the countryside.

- 11.4.13 The proposal would not impact on the setting or special character of historic towns. However, to the east of Common Edge Road, is the Marton Moss Conservation Area which is a designated heritage asset. The Heritage Impacts from the proposal are considered in part 11.8 of this report.
- 11.4.14 In terms of assisting in urban regeneration by encouraging the recycling of derelict and other urban land. Blackpool is intensely developed and has a tightly constrained boundary, which means there is a demonstrable lack of future development land. Opportunities for further employment expansion are therefore extremely limited, which has resulted in Fylde Borough Council having previously allocated 14ha of employment land to cover a shortfall in supply in Blackpool. There are no brownfield sites or other existing employment sites in Blackpool which could accommodate the scale of development proposed, as demonstrated in the Employment Land Update 2020. Parts of the site itself contains previously developed land and contaminated land which, subject to conditions, would be remediated.
- 11.4.15 The Core Strategy Spatial Vision and goals which underpin the vision, support a dual strategy focus on regeneration and supporting growth across the town, and the Council is committed to this approach. Growth in South Blackpool, along the airport corridor for employment uses is crucial in helping to meet Blackpool's economic requirements, and will complement on-going Inner Area regeneration.
- 11.4.16 Given the above, it is considered that the proposal would not result in significant harm to Green Belt purposes generally and the essential open character of the Green Belt would not be affected to an unacceptable degree.

Loss of Green Belt – demonstration of very special circumstances

- 11.4.17 The 2019 Indices of Multiple Deprivation ranked Blackpool as the most deprived local authority area for employment based on rank of average score. The town is third worst in respect of income and ninth worst in relation to education, skills and training and has a high percentage of low skilled seasonable jobs. The socio-economic benefits that would be provided by the development are therefore considered to weigh significantly in favour of the application.
- 11.4.18 The socio-economic benefits to Blackpool and the surrounding areas have previously been accepted by the Government through the designation of the application site and the wider area as an Enterprise Zone in 2015. The purpose of the Enterprise Zone is to generate significant job growth (the Masterplan indicates 5,000 jobs and 280 businesses), securing an estimated £300m plus of private sector investment; generating a cumulative Gross Valued Added total over the first five years of £232m and £2.08bn over the Enterprise Zone lifetime. The Enterprise Zone has already delivered an additional 1,400 jobs since it was designated and will assist in diversifying the local economy, which in Blackpool relies heavily on seasonal tourism and public administration and provide more secure employment opportunities to some of the Countries most deprived communities.
- 11.4.19 Without development on the application site specifically, critical infrastructure and access improvements for the Enterprise Zone could not be achieved. Without such, the ability of the Enterprise Zone to deliver the number and diversity of jobs needed in the area and realise its potential to uplift the economic prospects of one of the country's most deprived towns, would be put at significant risk.

11.4.20 The new link road would create a new eastern gateway from Common Edge Road linking into Amy Johnson Way to open up access to the industrial heartland of the Enterprise Zone and new development opportunities on the application site, including junction and highway upgrades on Common Edge Road. The new road will also link through to the existing development on the Enterprise Zone to relieve traffic congestion at the current single point of entry from Squires Gate Lane, which is shared with Blackpool Retail Park and a large Morrisons supermarket. Some £7.5m of Town Deal Funding has been secured to support the provision of infrastructure including the spine road and associated utility and drainage infrastructure and highway upgrades to Common Edge Road. It is crucial to note that the Town Deal funding is time limited and has to be expended by the end of financial year 2025/26.

11.4.21 Lands at South Blackpool are essential in attracting significant inward investment providing the opportunity for larger, more attractive development for businesses which cannot be readily accommodated elsewhere. The success of the Enterprise Zone is reliant upon generating sufficient income from retained business rates growth over its lifespan to meet the cost of prudential borrowing needed to fund early investment in the required infrastructure to enable the release of plots for development. This application plays a significant part in enabling the release of plots which are currently landlocked, that can accommodate large footplates and subsequently generate business rates once occupied. As Enterprise Zones do not receive specific public sector funding to support their delivery, they are reliant upon specific Enterprise Zone powers to enable borrowing against future business rates growth, a 100% of which is retained by the Enterprise Zone. The early development of this area is therefore fundamental to the successful delivery of EZ and its financial viability over its lifetime to 2041.

11.4.22 The Enterprise Zone has specific locational requirements and covers a fixed area, with no alternative sites for consideration and is endorsed by the Government. As such, there are sufficient considerations in favour of the proposal which would outweigh the harm caused to the Green Belt by reason of inappropriateness. It is considered that the material considerations discussed above do amount to **'very special circumstances'** to allow the development proposals to progress in principle, in this small section of Green Belt.

11.5 Loss of Playing Fields, Public Open Space and Green Infrastructure

11.5.1 The site (excluding the highway works proposed to Common Edge Road, Jepson Way and Amy Johnson Way) is public open space and most of the site is protected playing fields and constitutes green infrastructure. The proposal would lead to the loss of 7.14ha of playing fields at Common Edge Road and around 9ha of public open space.

11.5.2 Para. 92 of the National Planning Policy Framework states that planning decisions should aim to achieve healthy, inclusive and safe places which:

(a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

11.5.3 Para 93. States that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

(a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

(c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

(d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

(e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

11.5.4 Core Strategy Policy CS6 confirms that high quality and well-connected networks of green infrastructure will be achieved by protecting existing green infrastructure networks and enhancing, creating and connecting green infrastructure. In terms of existing open space, sports and recreational buildings and land, including playing fields, these will be protected unless the requirements of paragraph 99 of the NPPF are met.

11.5.5 The National Planning Policy Framework at Para, 99 confirms that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

11.5.6 Emerging Policy DM37: Community Facilities, states that proposals that would lead to the loss of a community facility through demolition or change of use will only be supported where:

a. the existing facility would be relocated or replaced in a location which serves the same community, or;

b. the applicant can demonstrate that there is no longer a need for the facility in its current use or as an alternative community use.

- 11.5.7 The Playing Pitch Strategy and Open Space Assessment clearly confirm that the playing pitches and public open space in this location, are not surplus to requirements, and the application is not for alternative sports and recreation. As such, the test here is that the loss of pitches and open space would be replaced by equivalent or better provision, in a suitable location.
- 11.5.8 The Enterprise Zone Masterplan was subject to public consultation in 2017 and has evolved over time, responding to commercial and economic requirements and engagement with Blackpool Leisure Services and the sporting bodies and clubs which use the playing fields and facilities. The Enterprise Zone Masterplan is therefore a material consideration of weight, as is the status of the Enterprise Zone itself as an area for employment development.
- 11.5.9 Since the designation of the Enterprise Zone, the intention has been to develop the playing fields for employment uses, and provide enhanced sporting facilities to the south-east corner of the Enterprise Zone with modern, fit for purpose changing facilities and enhanced access and car parking facilities.
- 11.5.10 A key component of the Playing Pitch Strategy and associated Action Plan is the delivery of the enhanced playing field re-provision at the Enterprise Zone, including good quality changing and toilet facilities which are suitable for all, including those with additional access requirements. The requirement to re-provide sporting facilities at Common Edge Road is also embedded in emerging Policy DM8 and the Council has committed more than £4.5 million for this enhanced sporting provision.
- 11.5.11 At the time the Playing Pitch Strategy was being prepared (adopted 2021), there were approximately 10 football pitches (17 including smaller, over marked pitches) and a rugby pitch on 9.96ha and these pitches were assessed as being of standard quality. The football pitches could provide 22.5 total match equivalent sessions and the rugby pitch, 2 match equivalent sessions per week.
- 11.5.12 Planning permission was granted in 2020 (ref 20/0108 Blackpool Council and 20/0114 Fylde Council) for the formation of 12 natural sports pitches to the south of Division Lane in the far south east corner of the Enterprise Zone. These pitches were brought into use during the 2021 season. These pitches are not over marked and once the highway works and car parking facilities have been completed, will support 75 total match equivalent sessions.
- 11.5.13 Planning permission has been granted (ref 20/0564 Blackpool Council and 20/0677 Fylde Council) for the provision of changing and social facilities, provision of floodlit 3G sports pitch, a grass rugby pitch and a rugby training area; reconfiguration and extension to existing car park; associated works and improvement works to the access from Common Edge Road/Queensway. It is anticipated that the new changing facilities will be ready during the 2022 football season and that the 3G pitch and rugby pitches would be available for the 2023/2024 season. Once completed, the rugby pitch would provide 3 match equivalent sessions per week and the floodlit 3G pitch would provide additional hours of play over and above a standard, unlit grass pitch.
- 11.5.14 The existing grass football pitches which would be lost as a consequence of granting planning permission for this outline application (7.14ha out of a current provision of

9.96ha), have already been re-provisioned to a better standard on 10.1ha of land to the south.

11.5.15 In terms of whether the replacement playing pitches/sports facilities would be in a suitable location, there is some overlap between the existing and new facilities. The Common Edge Road sports provision has simply moved southwards towards the boundary with Blackpool Airport and would be accessed by a dedicated and improved Division Lane West. As such, the location is considered to be suitable and would not result in existing users having to travel further to access the facilities.

11.5.16 Following the submission of further information regarding the timescales for discharging conditions imposed on the sports pitch permissions and the implementation of sporting provision, Sport England have concluded that the proposal meets Exception 4 of their Playing Fields Policy and criteria in para. 99 of the National Planning Policy Framework in that the area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality;
- of equivalent or greater quantity;
- in a suitable location; and
- subject to equivalent or better accessibility and management arrangements

11.5.17 As such, the loss of and the re-provision of playing pitches would accord with Policy CS6 and Sport England support the application, subject to condition 4.

11.5.18 In terms of the loss of public open space, this designation is not taken forward in Part 2 and public open space would simply be referred to as green infrastructure. However, the same tests set out in Policy CS6 and National Planning Policy Framework para. 99 would still apply to the loss of green infrastructure. Playing pitches and sports facilities are a type of green infrastructure and open space. Landscaping is a reserved matter but the indicative plans indicate the provision of green and blue infrastructure. As such, and subject to securing a good quality landscaping and sustainable drainage scheme, the re-provision and enhancement of green infrastructure would also comply with Policy CS6 and National Planning Policy Framework para. 99.

11.6 Ancillary retail and café uses

11.6.1 The application includes the provision of 275sqm retail unit and a 275sqm café and the Planning and Heritage Statement confirms that these ancillary units would support the employment use of the proposed development and existing employees in the Enterprise Zone and given their scale, would not be a destination in their own right.

11.6.2 Emerging Policy DM8 supports such a provision, as does the Enterprise Zone Masterplan and these are material considerations. Nonetheless, these are town centre uses which are proposed in an out-of-centre location and are not in accordance with an adopted, up-to-date plan. In advance of the adoption of Part 2, para. 87 of the National Planning Policy Framework requires Local Planning Authorities to apply a sequential test to demonstrate that there are no sequentially preferable locations within or on the edge of designated centres, that are both available and suitable to accommodate the uses proposed. The units proposed are not of a scale to warrant an Impact Assessment because the nearest local centre is more than 800m away.

- 11.6.3 There are no designated centres within the wider Enterprise Zone boundary. There is a large Morrisons supermarket and various food and drink outlets on Morrisons car park and on Blackpool Retail Park to the north/north west of the Enterprise Zone, but these are out-of-centre and are not sequentially preferable sites and therefore have not been considered in the sequential test.
- 11.6.4 The nearest local centre to the application site is just over 800m away from site at Squires Gate Lane/St Annes Road. That local centre has 8 units, including a convenience store, off licence, public house, sandwich shop, hairdressers and hot food takeaways. There are no vacancies within the centre or adjacent land available to expand the local centre.
- 11.5.5 The next closest local centre is at Squires Gate Lane/Abbey Road, just over a kilometre from the site. That local centre has just 5 units and includes a dwelling. This designation is not being taken forward in Part 2 and so is not a sequentially preferable site.
- 11.6.6 The Highfield Road/ Common Edge Road local centre is approximately 1.3km from the site and comprises 11 units offering a range of local convenience goods and services. There are no vacancies within the centre or adjacent land available to expand the local centre.
- 11.6.7 Highfield Road/ Acre Gate local centre is approximately 1.46km and comprises 13 units. There are no vacancies within the centre or adjacent land available to expand the local centre.
- 11.6.8 Given the scale of the units proposed and their purpose to serve the Enterprise Zone, and that the provision would comply with emerging Policy DM8, it has not been considered necessary to widen the sequential search beyond 1.5km of the application site in this instance.
- 11.6.9 The applicant states that locating these units together within the application site is an efficient use of land and would reduce reliance on car use and encourage linked trips and Case Officers agree with that assessment.
- 11.6.10 In light of the above, no unacceptable conflict with the aims of the sequential test is identified and no unacceptable impact upon the health of the local centres is anticipated. The retail and café provision proposed on site is therefore considered to be acceptable.

11.7 Marton Moss Neighbourhood Plan

- 11.7.1 The application includes the demolition of 2 School Road to facilitate the widening of School Road at its junction with Common Edge Road and highway works to Common Edge Road and Division Lane. These works are within the Marton Moss boundary and so CS26: Marton Moss is relevant.
- 11.7.2 A previous application for the demolition of this dwelling and the erection of a replacement dwelling on adjacent land, was granted permission in 2021 (21/0272 refers), and this is a material consideration of weight in relation to this element of the outline application. However, as more detailed highway works have emerged, it has become necessary to widen the adjacent School Road/Common Edge Road junction, which will take up further land at 2 School Road, hence the inclusion of the demolition of the dwelling on the site within this application.
- 11.7.3 Policy CS26 advocates a Neighbourhood Planning approach for Marton Moss and the

Marton Moss Neighbourhood Forum published a draft a Neighbourhood Plan for public consultation earlier in 2022. There are no policies in the draft Plan which would preclude the demolition of 2 School Road. CS26 similarly is silent on demolition within this area.

- 11.7.4 Any future development proposals for the remaining land at 2 School Road would be assessed separately.

11.8 Heritage Impacts

- 11.8.1 This part of Marton Moss is also a Conservation Area and was designated as such in 2019 and lies to the east of Common Edge Road. Part of the application site to the east of Common Edge Road (2 School Road, School Road and part of Division Lane) are within that Conservation Area and new development on the Enterprise Zone and the associated highway works would have an impact on the setting of the Marton Moss Conservation Area.
- 11.8.2 Policy CS8 of the Core Strategy relates to heritage and supports proposals that retain and reuse assets whilst conserving and enhancing their significance and setting. The policy equally seeks to enhance the setting and views of heritage assets and strengthen existing townscape character. Saved Policy LQ10 requires development to preserve or enhance the character and appearance of the Conservation Area and states that permission for the demolition of any building or structure that makes a positive contribution to the character or appearance of a Conservation Area will not be granted other than in exceptional circumstances, depending on the importance of the building and its contribution to the character and appearance of the Conservation Area. Demolition will not be allowed before detailed proposals for the re-use of the site and any replacement buildings have been approved.
- 11.8.3 Emerging Policy DM27: Conservation Areas states that proposals affecting the setting of any of Blackpool's Conservation Areas, should conserve or enhance those elements that make a positive contribution to their special character and appearance, including its setting.
- 11.8.4 Para. 199 of the National Planning Policy Framework states that when considering the impact of a proposed development on the significance of a designated heritage asset (the Conservation Area), great weight should be given to the asset's conservation.
- 11.8.5 Para. 202 of the National Planning Policy Framework states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 11.8.6 All matters are reserved with this application, including design and scale. However, it is reasonable to assume that the scale of the built development will be similar to the existing development on the Enterprise Zone (two/three storey or 9-12m tall). Given that the built form of the employment uses would be approximately 100m away from the closest properties on Common Edge Road and the Conservation Area boundary, and given that there is a buffer zone with landscaping and a housing allocation under the emerging Part 2, it is considered that the employment uses would lead to less than substantial harm to the setting or significance of the designated heritage asset.
- 11.8.8 The application is supported by the Civic Trust and the Built Heritage Manager has not objected, subject to suitable screening, appropriate road safety measures, improvements to the road surface of School Road and restrictions on the size of vehicles which could use School Road. Some of the School Road surface would be replaced as part of the highway

works, a 7.5 tonne weight restriction on School Road is now in place, and the detailed highway works will include further 7.5 tonne weight restriction signage. Landscaping is a reserved matter for future consideration.

- 11.8.9 In relation to the demolition of 2 School Road and the works to the junction at School Road and Common Edge Road and Divisions Lane within the Conservation Area, the Built Heritage Manager has previously confirmed that 2 School Road was built around 1960 and makes a neutral contribution to the significance of the Conservation Area. The plot on which it sits and the adjacent green space was occupied by a greenhouse for several decades before it was demolished to accommodate the current dwelling on the site. Therefore, the loss of this dwelling would not harm the character or significance of the Conservation Area. The widening of the junction on School Road adjacent to Common Edge Road and Divison Lane would have an impact on the character of the Conservation Area but it is considered that the harm is also less than substantial.
- 11.8.10 No details have been provided regarding how the remaining land at 2 School Road would be re-used or any replacement development on the site, which technically would not accord with the requirements of Saved Policy LQ10. However, a condition can be imposed which requires the submission of details of how the remainder of the plot, outside of the highway works, would be treated once works are completed (condition 36), to ensure the site is not left unsightly following demolition.
- 11.8.11 A disused single storey building associated with the old football training facilities would also be demolished. This building is over 140m away from the Conservation Area boundary and its loss would have no impact on the character or significance of the Conservation Area. The demolition of the former existing changing facilities close to the Common Edge Road junction with Jepson Way would be considered under a separate, future application.
- 11.8.12 In terms of weighing the less than substantial harm to the significance of the Conservation Area against the public benefits of the scheme as a whole, the demolition of 2 School Road would facilitate the highway infrastructure improvements proposed at the junction on Common Edge Road and School Road which would feed into the wider highway improvements. Highway infrastructure improvements are essential in delivering alternative and improved access to the Enterprise Zone, which will support further development in the Enterprise Zone and the economic benefits that the Enterprise Zone will deliver, as discussed elsewhere in this report.
- 11.8.13 As such, the public benefits of the proposal as a whole, outweigh the less than substantial harm to the Marton Moss Conservation Area through the loss of 2 School Road and the highway works associated with delivering the economic development in the Enterprise Zone.

11.9 Archaeology

- 11.9.1 Para 194 of the National Planning Policy Framework states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. Similarly, emerging Policy DM30 states that where there is knowledge of archaeological remains or reasonable grounds for the potential of archaeology, proposals will be expected to be accompanied by an assessment of the significance of any archaeology prior to the determination of an application for the site. Accordingly, the application is accompanied by an Archaeological Desk Based Assessment.

11.9.2 This Assessment concludes that there is no evidence to indicate the presence of archaeological remains within the boundary of the site which would preclude development. Due to the lack of potential for significant archaeological remains there would be no need for a requirement for further fieldwork.

11.9.3 Lancashire County Council's Historic Environment Team who advise the Council on archaeological matters, has set out that there are a number of mistakes and omissions in the Assessment and is considered to underplay the potential for prehistoric to medieval activity to have occurred here on the fringes of Marton Moss and that various issues should have been considered further. However, it concludes that the existing sports pitches are likely to have badly impacted any archaeological remains and whilst there may be remains of WWII in the vicinity associated with the defences of the airfield, the known pillboxes (to the south of the application site) or the Vickers shadow factory, but as these would not be particularly rare, and so no further archaeological fieldwork can be justified.

11.9.4 As such, it is not anticipated that the development proposed would have any substantial harm to any designated or non-designated heritage assets of archaeological interest.

11.10 Traffic and transportation

11.10.1 Within the Section 9 of the National Planning Policy Framework, great emphasis is given to the need to prioritise walking and cycling, to facilitate access to public transport, and to allow for the efficient delivery of goods, and access by service and emergency vehicles. Section 9 also states that development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations and that development that will generate significant amounts of movement should be required to provide a travel plan.

11.10.2 Para 104 of the National Planning Policy Framework confirms that transport issues should be considered from the earliest stages of development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

11.10.3 Para 105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

11.10.4 Para 110 states that in assessing applications for development, it should be ensured, given the type of development and its location and that safe and suitable access to the site can be achieved for all users. It should also be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway

safety, can be cost effectively mitigated to an acceptable degree. Para 111 confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 11.10.5 Core Strategy Policy CS5 relates to connectivity and states that a sustainable, high quality transport network for Blackpool will be achieved by working with bus operators and developers to provide enhanced bus services served by high quality infrastructure and reducing road congestion by eliminating pinch points. CS5 also states that safe, enhanced and extended cycle routes should connect neighbourhoods with employment sites along with secure cycle parking at new developments, and that changing travel behaviour can occur by pre-actively working with developers to increase the proportion of journeys that use sustainable transport.
- 11.10.6 Policy CS27 relates to South Blackpool Transport and Connectivity specifically and states that development proposals on South Blackpool will be required to prioritise sustainable modes of transport between homes, jobs and community facilities. Convenient access to public transport and improved pedestrian and cycle infrastructure are required to suppose major employment growth in the area.
- 11.10.7 Saved Policy LQ3 relates to the layout of streets and spaces and requires development to create direct and integrated routes through a site which provide well-signposted and easy access to the existing street network, nearby facilities and public transport. Saved Policy AS1 confirms that development will only be permitted where convenient, safe and pleasant pedestrian access is provided, appropriate provision is made for cycle access, appropriate access and facilities for people with impaired mobility are provide and appropriate provision is made for public transport. AS1 also requires development to provide safe and appropriate access to the road network for all, to incorporate appropriate traffic management measures to reduce traffic speeds and give pedestrians, cyclists and those with impaired mobility priority along with efficient provision of public transport. Appropriate levels of car, cycle and motorcycle parking, servicing and operational space are also required.
- 11.10.8 Saved Policy AS2 states that new developments which would generate significant levels of travel will only be permitted in locations which have good access to the existing main highway network and which are well served by sustainable modes of transport. Emerging Policy DM41 echoes Saved polices AS1 and AS2 but also requires electric vehicle charging infrastructure.
- 11.10.9 Emerging Policy DM8 identifies that cycle and pedestrian connectivity will be incorporated into a Design Framework for the Enterprise Zone, which will also set out the design principles for the site including green and blue infrastructure.
- 11.10.10 The application is supported by indicative layout plans, a Transport Assessment, a Framework Travel Plan and Public Transport Strategy.
- 11.10.11 Lancashire County Council Highway Authority has requested detailed highway design at this stage and have recommended that the application is not presented to Committee until these details have been worked up and agreed. The application is in outline with all matters, including access and layout, reserved for future consideration. The Head of Highways and Traffic Management Services has confirmed that the issues raised by LCC have been factored into the emerging detailed design. Some requests, such as the imposition of a Car Park Management Strategy condition on this application and public transport phasing and funding

are addressed elsewhere in this report. Any further consultation responses or updates from Lancashire County Council will be reported in the Update Note.

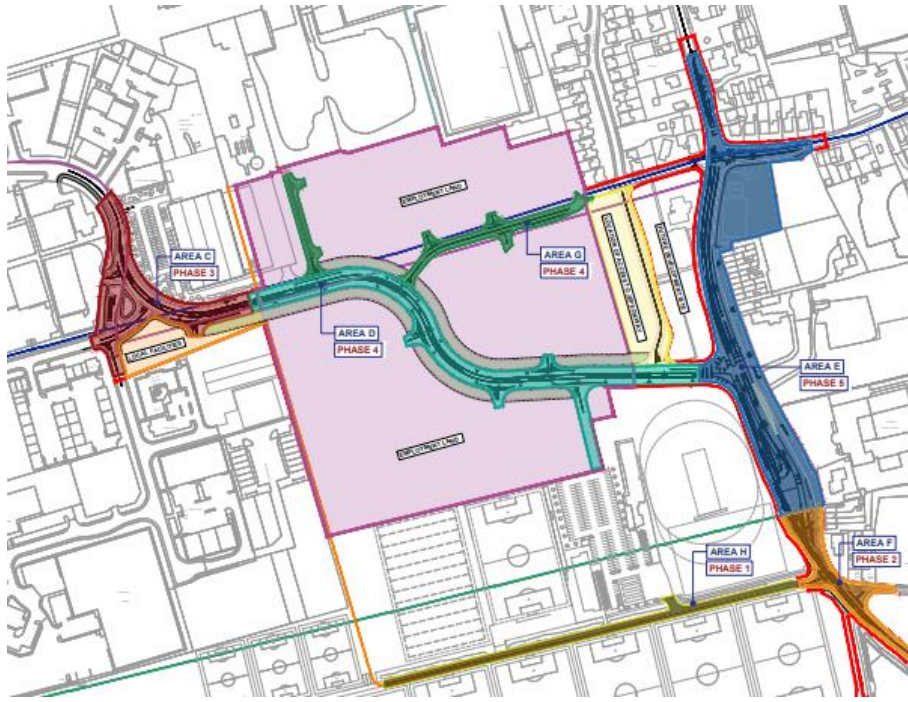
11.10.12 The application site includes existing sections of highway on Amy Johnson Way, Common Edge Road, School Road, Division Lane and Jepson Way, which would be altered to improve highway capacity, safety and function and to provide a new link road between Amy Johnson Way and Common Edge Road. There is now a 7.5 tonne weight restriction in place on School Road so the Police can now enforce against any HGV's using School Road other than for access. Further restrictive road signs will be included in the detailed design scheme. Some of the highway works to Common Edge Road and Division Lane are in Fylde and so the authors of the Transport Assessment and the Councils' highway officers have been working with Lancashire County Council in developing the design of the highway works. National Highways have no objection to the works in principle and have not requested to be consulted on any further details.

11.10.13 Common Edge Road is a busy main thoroughfare between Blackpool and Lytham which does suffer from congestion at peak times. There is an existing pathway along the west side of Common Edge Road, which is served by a bus stop to the east of the cricket pitch, and a cycle path runs along Queensway to the south which terminates at that bus stop. There are further bus stops on Squires Gate Lane outside Morrisons and at the Halfway House, although no services currently run into the Enterprise Zone. The nearest train station is Squires Gate which is approximately 1.8m away as the crow flies or approximately 2.2km walking distance.

11.10.14 The cumulative impacts of the works along with the improved access to the new sports pitches and facilities to the south have been considered in the Traffic Assessment. The Transport Assessment also takes into consideration the M55 to Heyhouses link road and other committed development in Blackpool and Fylde. A phasing plan indicates how the highway works would be implemented:

- Phases 1 and 2 (shown in yellow and orange respectively on the plan overleaf) – includes the new/improved access road to the sports facilities and works to the highway on Common Edge Road and the Division Lane junction;
- Phase 3 (shown red) would involve the creation of a new junction at Amy Johnson Way;
- Phase 4 (shown green) would create the new spine road through the site and a new link road from Jepson Way;
- Phase 5 (shown blue) would involve a new signalised junction on Common Edge Road for the spine road, directly to the north of the existing cricket pitch and works to the Common Edge Road/School Road junction including removing Jepson Way connection from that junction.

Figure 2: Indicative proposed phased highway works



11.10.15 Included in the scope of works is a pedestrian refuge near Division Lane, at the School Road junction and at the new junction on Common Edge Road, footway improvement works, cycle infrastructure, carriageway reconstruction works and street lighting. A southbound one-way system would also be considered to create safer access and egress for the service road to the Trebaron Garden Centre, reducing vehicle movements along that stretch of road. Again, the submitted plans are indicative only and the details will be agreed with Lancashire County Council and submitted at reserved matters stage. A Stage 1 safety audit has been completed for the highway works.

11.10.16 Occupiers of Jepson Way and Oakwood Close would experience slightly longer vehicle trips if they wanted to travel north along Common Edge Road or east along School Road as they would have to travel south along the new access road to join the new spine road before turning north onto Common Edge Road. However, travelling south would take no longer and the option of travelling west through the Enterprise Zone to Squires Gate would be slightly shorter and with fewer traffic signals. On balance, it is not considered that the residents would be inconvenienced to any unacceptable degree by the removal of Jepson Way from the Common Edge Road junction. The proposals have been assessed by the Head of Highway and Traffic Management Services and he has no objections to this element of the scheme.

11.10.17 In terms of trip generation, the methodology has been agreed with Blackpool and LCC Highway Authorities. The Transport Assessment states that the weekday morning peak (08.00-09.00) will generate 208 trips, of which 18 would be HGVs, the weekday evening peak (17.00-18.00) will generate 182 trips, of which 10 would be HGVs and Saturday peak (12.00-13.00) will generate 33 trips, none of which would be HGVs.

11.10.18 The Transport Assessment confirms that the M55 to Heyhouses Link Road, which has been promoted by Lancashire County Council and the Lancashire Local Economic Partnership and is due to be operational late 2023/early 2024, will help relieve congestion on this section of Common Edge Road. The Transport Assessment factors in all known relevant committed developments in both Blackpool and Fylde.

- 11.10.19 The Transport Assessment confirms that nearby junctions operate at capacity in the 'no development' scenario to 2026, with the M55 link road in place. Subject to the detailed design of the highway works and any mitigation scheme proposed, and taking into account of committed development in the area, the application site can accommodate the proposed development traffic and future traffic flows. The Transport Assessment concludes that the development would not have a severe cumulative impact on the road network.
- 11.10.20 The Head of Highway and Traffic Management Services confirms that the principle of creating a new access onto Common Edge Road is acceptable and that the proposed highway works, together with County Council schemes nearby will both accommodate Enterprise Zone expansion traffic and bring significant relief to the area, as well as better spreading the flows into and from the Enterprise Zone between the Squires Gate Lane accesses and Common Edge Road. As such, subject to detailed design, it is not anticipated that the development would have an unacceptable impact on highway safety or have a severe impact on the road network once operational. Inevitably there will be some disruption to traffic flows in the area whilst highway works are undertaken, but this disruption would be short term and unavoidable.
- 11.10.21 The Transport Assessment confirms that the highway works will be designed to facilitate access by sustainable modes of transport, including walking, cycling and public transport. A Framework Travel Plan supports the application, which sets out in principle, the aims, objectives, targets and measures to reduce the number of single occupancy car trips generated by the development. This provides the framework for individual Travel Plans which will be required for each plot and the wording for the requirements has been taken from the Lancashire County Council consultation response as requested (condition 29). The successful implementation of Travel Plans should also reduce congestion on the highway network and improve air quality.
- 11.10.22 There is a bus route (service 17) along Common Edge Road with the nearest bus stop around 100m away from the new junction on Common Edge Road, with buses every 30 minutes Monday to Saturday. The number 17 links Lytham to Blackpool Town Centre. The number 5 (Halfway House to Victoria Hospital) and 7 (St Annes to Cleveleys) bus services run along Squire Gate Lane every 30 minutes. These stops are just over 1km from the proposed site access from Amy Johnson Way, which is more than the recommended walking distance set out in the Guidelines for Planning for Public Transport Developments. As such, to ensure that future employees on the site have good access to public transport and to reduce the reliance on commuting by car, a bus service diversion into the estate and the necessary supporting infrastructure will be required in accordance with the provisions of the National Planning Policy Framework and policies in the Local Plan.
- 11.10.23 An amended Public Transport Strategy has been submitted which confirms that a requirement for a new frequent service which connects residential areas with employment opportunities, including the Enterprise Zone, is set out in the Blackpool Council Bus Service Improvement Plan (October 2021). The Public Transport Strategy notes that the requirements in the Bus Service Improvement Plan was written based on an earlier iteration of the Enterprise Zone scheme which proposed twice as much floorspace than currently proposed and has thus far been unsuccessful in securing Government funding.
- 11.10.24 The applicant and the Public Transport Strategy confirm that the new link road would include bus stops and that their location would form part of the detailed design process for future consideration. However, the details of the end users of the development and their specific operational requirements are currently unknown and factors such as staff numbers,

shift patterns etc would affect public transport demand, when it operates and the optimum routing.

- 11.10.25 The Public Transport Strategy estimates that the development will generate between 123 and 214 bus trips each typical weekday, depending on the nature of businesses that occupy the development. The applicant has committed to survey existing employers on the Enterprise Zone to understand the existing public transport demand and travel to work patterns of their employees and any local barriers to using public transport. They will work with Blackpool Transport to assess the costs of providing a range of public transport options including the timing, duration and potential subsidy of a service. A dedicated new bus service is unlikely to be necessary but existing bus routes could be diverted so that existing services run along the new link road and Amy Johnson Way. It appears that extending route 5 and/or re-routing route 7 would be the most straight forward solution, but the final details would be agreed by condition in consultation with Blackpool Transport, along with phasing and a mechanism to cover the associated costs (condition 31).
- 11.10.26 As previously stated, the new link road and the highway works will include cycle lanes and footpaths to encourage Active Travel and cycle storage provision and changing facilities for each plot can be agreed by condition (conditions 27 and 28).
- 11.10.27 An electric vehicle charging hub is proposed off Amy Johnson Way and the indicative layout plan suggest that around nine electric vehicle spaces could be accommodated. Furthermore, at least 10% of parking spaces for each plot should have appropriate infrastructure and be dedicated for use by electric vehicles (condition 26) and a further 10% should be designated as accessible spaces should be provided and this provision could be secured through condition (condition 25). Motorcycle parking should also be provided at a ratio of one space per 25 car parking spaces and again, this would be secured by condition (condition 25). These measures along with Travel Plans, footpaths, cycle and public transport infrastructure will ensure that there are a range of more sustainable commuting options available for future occupiers of the site.
- 11.10.28 Details of how each plot would be serviced, including swept path analysis would be agreed by condition (condition 30) to ensure that each plot can be safely and appropriately serviced without conflict with access and car parking arrangements.
- 11.10.29 The building footprints shown on the indicative plot layout identifies how around 25,000 sqm of floorspace could be accommodated on the site with around 503 parking spaces. The application is for 35,000 of floorspace which allows for flexibility and for the inclusion of mezzanine levels.
- 11.10.30 Assuming the maximum 35,000 sqm of floorspace comes forward, broken down into 3,500 sqm of Use Class E(g), 17,500 sqm of Use Class B2 and 14,000sqm of Use Class B8, a total of 513 parking spaces would be required, although the Parking Standards in Part 2 confirm that a flexible approach to the level of car parking provision will be applied. No unacceptable impacts are anticipated in terms of car parking provision and the detailed provision for each plot will be assessed by condition (condition 25).
- 11.10.31 Lancashire County Council has suggested that the Car Park Management Strategy associated with the sports pitches to the south of the application site needs to be updated and should be the subject to a condition on this application. However, the issue of the Car Park Management Strategy is covered by conditions attached to 20/0108 and 20/0564 and it is therefore unnecessary and unreasonable to impose a replica condition on this application.

It is understood that negotiations are ongoing with Lancashire County Council with regards a Car Park Management Strategy for the sports pitches.

11.10.32 A condition requiring a Demolition and Construction Management Plan which would include the arrangements for minimising mud and debris on the highway and the routing of construction traffic is considered necessary in the interests of highway safety (condition 23).

11.10.33 One of the objections relates to the loss of the existing park and stride scheme for pupils attending the school and School Road. The agent has confirmed that St Nicholas Church of England Primary School has a drop-off/pick-up area to the west of the school on School Road. Furthermore, the red line boundary for the application site only affects the western portion of the car park sited to the west of Jepson Way changing rooms and the car park will remain open for now. Moving forward the applicant will liaise with St Nicholas Church of England School to help find an alternative, appropriate site for the park and stride.

11.11 Environmental Quality

11.11.1 Section 15 of the National Planning Policy Framework requires planning decisions to ensure that new and existing development is not put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability and development, where possible should help improve local environmental conditions. Section 15 goes to talk about remediating contaminated land and decisions avoiding significant adverse impacts on health and quality of life in terms of noise, air and light pollution.

11.11.2 Saved Policy BH4 relates to public health and safety and seeks to safeguard public health in terms of air quality, land contamination, noise and vibration, light pollution and water pollution. Emerging Policy DM36 relates to controlling pollution and contamination and permits development which would not lead to significant adverse effects on health and amenity in relation to noise, vibration, odour, light, dust or other pollution. This policy requires the safe remediation of contaminated land and that development does not give rise to a deterioration of air quality or result in water pollution.

11.11.3 The Environment Agency has made reference to the site being close to waste and combustion facilities and that the occupants of the proposed development could be exposed to odours, dust, noise, bio-aerosols or pests. The Environment Agency has confirmed that the severity of the impacts will depend on the size and nature of development and its proximity to these facilities and the way the development is operated and managed and the weather conditions.

11.11.4 The waste facility is the Fox Brothers site on Squires Gate Industrial Estate. When Fox Brothers initially began operating on the site in March 2020, there was no planning permission in place for their operations and a significant number of complaints were received due to noise, dust and fumes. A planning application was submitted towards the end of 2020 for the use of the site as a contractors depot, incorporating land levelling, vehicle storage for up to 67 wagons, staff and customer parking, erection of workshop, concrete batching plant and aggregate bays (20/0674 refers). Planning permission was refused by the Planning Committee in June 2021 and an enforcement notice was served requiring the cessation of activities on the site. However, Fox Brothers appealed against the enforcement notice and a Planning Inspector granted planning permission in April 2022, albeit on a temporary basis of three years and subject to a raft of conditions. This temporary permission does not include concrete batching and such activities have ceased on site. The Fox Brothers permission expires in April 2025 and so any ill effects as a result of the

temporary permission would not be long term. In the appeal decision notice, the Inspector confirmed that the use of the Fox Brothers site is sui generis and so any future use of the site would require planning permission and clearly, development coming forward on the application site would be a material consideration in determining any future applications for that site.

11.11.5 In terms of the combustion facility referenced by the Environment Agency, this is the 7MW gas powered electricity generation facility off Amy Johnson Way, to the west of the application site. This is a relatively small generator which is designed to be brought into use at peak times, when there are surges in electricity demand. The air quality assessment for that planning application (17/0241 refers) concludes that with the generators operating for up to 3,000 hours a year (125 days), the air quality effects of the generators would not be significant. A condition is imposed on that permission restricting the operation of the generators to no more than 1,500 hours without further agreement from the Local Planning Authority.

11.11.6 As such, it is not anticipated that the proximity of either of these facilities would have any significant detrimental impact on any future occupiers of the application site.

11.11.7 The Health and Safety Executive and Environmental Protection has also raised concerns regarding a Hazardous Substances Consent that was granted on the Fox Brothers Site, when the site was occupied by Calor Gas. Calor Gas no longer occupy the site but the HSE have confirmed that the consent is still in place and transfers to any new owner or occupier of the land. Neither the Health and Safety Executive nor Environmental Protection object to the application on the basis that Blackpool Council as the Hazardous Substance Authority will revoke the Hazardous Substances Consent and that revocation process has begun. However, it is unclear how long that process will take, and so a condition has been imposed, requiring that the Hazardous Substances Consent is revoked prior to the occupation of the development (condition 9).

11.12 Ground Contamination and Water Quality

11.12.1 The Environment Agency has confirmed that the previous use of the proposed development site as part of Blackpool Airport and two former landfills presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon Secondary Aquifer B and there are several watercourses on site and within 100m of the development.

11.12.2 The submitted Phase 1 Desk Study indicates high levels of methane gas in some boreholes and elevated levels identified in others. The Desk Study demonstrates that it will be possible to manage the risks to controlled waters and to human health subject to a further investigations and mitigation.

11.12.3 Further detailed information is required before built development is undertaken and planning conditions are needed which require the submission of a preliminary risk assessment, site investigation and remediation strategy (condition 5) and verification report (condition 6). Further gas monitoring and any necessary mitigation is covered by condition 7.

11.12.4 The Environment Agency has also recommended that, prior to being discharged into any watercourse, all surface water from parking/servicing areas should be passed through an oil interceptor, designed and constructed to have a capacity and details compatible with the

site being drained. The Greater Manchester Ecology Unit has also recommended the submission a Construction Environmental Management Plan (CEMP: Biodiversity) and a scheme for biodiversity mitigation and enhancement measures, given that the existing habitat is suitable for use by amphibians, hedgehogs and reptiles and that the loss of grassland would result in the loss of biodiversity. These conditions (condition 8 and condition 19) would further safeguard the aquatic environment and water quality.

11.13 Noise

11.13.1 The submitted Noise Report concludes that mitigation measures would be incorporated into the detailed design of the commercial areas to ensure noise impacts are reduced to an acceptable level at noise sensitive receptors and that mitigation requirements will be confirmed at the detailed design stage. In terms of noise impacts due to changes in road traffic, the Noise Report concludes that these will be negligible.

11.13.2 Subject to a condition requiring further noise assessments to be undertaken (condition 13), along with the submission of noise attenuation details where necessary, no unacceptable impacts on amenity in terms of noise are anticipated for either the occupants of the development or any neighbouring noise sensitive development.

11.14 Air quality and dust

11.14.1 An Air Quality Assessment (Wardell Armstrong April 2019) has been submitted which was prepared for the previously withdrawn outline application (19/0271 refers) for up to 90,000sqm of industrial floorspace and up to 57 houses along with replacement sporting facilities. Given that this application is for up to 35,000sqm of business, industrial and storage/warehousing uses and does not include the residential or sports facilities elements, an Air Quality Statement rather than a new assessment has been submitted. This supports the 2019 Assessment and this approach has been supported by Environmental Protection Officers at both Blackpool and Fylde.

11.14.2 The scope and site area of the current application have been reduced in size compared to the withdrawn 2019 proposals and therefore the results of the construction phase dust assessment undertaken in 2019, are now overly robust and the current proposals are likely to result in a smaller impact associated with each phase of the assessment. Similarly, traffic generation will be lower than for the previous proposals and therefore pollution concentrations from nitrogen dioxide (NO₂) fine particulate matter (PM₁₀ and PM_{2.5}) will be less than those predicted in the 2019 assessment, resulting in reduced impacts at sensitive receptors.

11.14.3 The Statement confirms that subject to the mitigation measures set out in the Section 5.1 of the 2019 assessment, which would substantially reduce the potential for nuisance dust and particulate matter generated during the construction phase, any residual impacts are not considered to be significant in accordance with the Institute of Air Quality Management (IAQM). The mitigation measures include the re-vegetation of earthworks and exposed areas, protection of surfaces and exposed materials from wind, soft strip buildings for demolition, water suppression during demolition, storage of exposed materials away from sensitive receptors, the use of water assisted dust sweepers and wheel washing.

11.14.4 In terms of the operational phase of the development and the development-generated road traffic emissions, the 2019 assessment predicted that the development would have a negligible impact on concentrations on NO₂ and PM₁₀ and PM_{2.5} at sensitive receptor

locations. The 2019 assessment report concluded that, in accordance with Institute of Air Quality Management guidance, the effect of the proposed development on human receptors was considered not to be significant.

11.14.5 Furthermore, the Air Quality Statement confirms that background pollution concentrations and vehicle emissions are likely to reduce in future years owing to older, more polluting vehicles being replaced by less polluting vehicles, including a greater uptake of electric vehicles. Further best practice mitigation measures would also assist in reducing any impacts on air quality, such as utilising low NO₂ boilers, the implementation of a Travel Plan and provision of electric vehicle charging points.

11.14.6 Conditions are imposed in relation to electric vehicle charging points (condition 26) and the scheme includes an electric vehicle charging hub. Details of cycle storage and changing facilities are also required to be submitted by condition (conditions 27 and 28) along with the requirement for the submission of a Demolition and Construction Management Plan (condition 23).

11.14.7 As above, subject to the imposition of a further condition requiring the development to proceed in accordance with the site specific mitigation measures set out in Section 5.1 of the Wardell Armstrong Air Quality Assessment April 2019 (condition 11), no unacceptable impacts on air quality are anticipated.

11.15 Residential amenity

11.15.1 Para 130 of the National Planning Policy Framework states that planning decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

11.15.2 Core Strategy Policy CS7 requires new development to ensure that the amenities of nearby residents are not adversely affected. Saved Policy BH3 states that developments will not be permitted which would adversely affect the amenity of those occupying residential accommodation by the scale and siting of the development and the use of and activity associated with the development.

11.15.3 The application is in outline form with all matters reserved and the maximum scale of development is currently unknown.

11.15.4 The indicative plot layouts show built development approximately 24 metres away from residential boundaries and 30m from rear elevations to the east on Oakwood Close, separated by a landscaping buffer of at least 6m. To ensure that development closest to this residential boundary, does not have an unacceptable impact on light or outlook, a condition restricting the height of development closest to that boundary to no more than 10 metres (approximately three storeys in scale) should protect neighbour amenity in terms of outlook and light (condition 37). The positioning of windows would be agreed at reserved matters stage but there is no reason to assume that this element of the scheme would have an unacceptable impact on privacy given the separation distances and height restriction proposed.

11.15.5 The scheme would not have any material impact on residential amenity in terms of outlook, loss of light or privacy for the occupiers of properties on Common Edge Road or any other residential uses.

11.15.6 Subject to the submission of a Demolition and Construction Management Plan (condition 23) which would contain dust mitigation and noise control measures and the hours of and days of demolition/construction, no unacceptable impacts on residential amenity are anticipated during the demolition/construction phase.

11.16 Flood risk and drainage

11.16.1 The application is accompanied by a Flood Risk Assessment and a Flood Risk and Drainage Strategy. The National Planning Practice Guidance identifies the Flood Risk Vulnerability Classification of development types. Development types are classed as 'Essential Infrastructure', 'Highly Vulnerable', 'More Vulnerable', 'Less Vulnerable' and 'Water Compatible Development' depending on their use and vulnerability. As commercial development is proposed, this development is classified as Less Vulnerable.

11.16.2 As such, and given that the application site is wholly within Flood Zone 1 and so is at low risk of flooding from river or tidal flooding, the Sequential Test is considered to be passed and the Exception Test does not need to be applied. The submitted Flood Risk Assessment identifies that the site is at low risk of flooding from other sources.

11.16.3 Para 167 of the National Planning Policy Framework confirms that when determining planning applications, Local Planning Authorities should ensure that flood risk is not increased elsewhere. Para 169 of the National Planning Policy Framework states that major developments should incorporate sustainable urban drainage systems unless there is clear evidence that this would be inappropriate.

11.16.4 Core Strategy Policy CS9 also requires appropriate sustainable urban drainage systems where surface water run-off will be generated and, where this is not possible, surface water entering the combined sewer should be reduced by as much as is reasonably practicable. In addition, emerging Policy DM31 requires surface water to be discharged in line with the National Planning Practice Guidance in the most sustainable drainage option available. On greenfield sites, discharge rates should be replicated and on previously developed sites, applicants should target a reduction in surface water discharge to greenfield run-off rates.

11.16.5 The site levels drop slightly from the north to the south east and there are a number of watercourses that run through the site, comprising surface water drains and ditches. The watercourses drain north to south before being diverted easterly via a piped network along Division Lane towards Moss Sluice, which is located approx. 0.5km east of the site boundary.

11.16.6 The Drainage Strategy suggests that infiltration would be a feasible option for disposal of surface water in parts of the site and that the strategy is being developed to assess the maximum potential for this and could potentially reduce overall runoff to less than the current greenfield runoff rate. The Drainage Strategy anticipates that a hybrid scheme will be developed with infiltration into ground being utilised as much as possible and which includes a combination of permeable paved surfaces, swales/vegetated channels and limited buried storage. The indicative plot layout plan indicates an area where a detention basin would be located to the east of the new grass football pitches, but further, more comprehensive investigations and assessments are required to inform a detailed design. The information submitted, has been considered and found to be acceptable by the Council as Lead Local Flood Authority.

11.16.7 United Utilities has confirmed that there is insufficient information on the drainage details and have requested the imposition of a standard drainage and a drainage maintenance and management condition (conditions 15 and 16). Subject to the imposition of these conditions, no unacceptable impacts on flood risk or drainage are anticipated.

11.16.8 United Utilities has also stated that a large diameter trunk main crosses that site and have requested details of how the water main will be protected from damage as a result of the development. These details can be agreed by condition (condition 10).

11.17 Climate change and sustainable design

11.17.1 The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development. The National Planning Practice Guidance states that addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. Para 107 of the National Planning Policy Framework confirms that development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. Emerging Policy DM41 requires 10% of all car parking spaces to have electric vehicle charging infrastructure and this can be secured by condition (condition 26).

11.17.2 Core Strategy Policy CS10 relates to sustainable design and requires non-residential developments to orientate buildings to incorporate passive environmental design, to minimise energy use and to investigate opportunities for the inclusion of renewable and low carbon energy provision. CS10 also requires that non-residential developments over 1000sqm achieve BREEAM 'very good' (or any future national equivalent). BREEAM (Building Research Establishment Environmental Assessment Method) is a sustainability assessment method that is used to masterplan projects, infrastructure and buildings and sets standards for the environmental performance of buildings through the design, specification, construction and operation phases of development. A scheme is assessed by independent licenced assessors and scored against a range of categories such as energy, ecology, water, health, pollution, transport, materials, waste and management and focuses on reduced carbon emissions, low impact design, climate change adaptation, ecological value and biodiversity protection. In order to achieve BREEAM 'very good', a project needs to score a minimum of 55%.

11.17.3 The application is accompanied by a BREEAM Pre-Assessment Estimator Report which states that, based on the proposals and the authors' experience of what may be feasibly achieved for a site and proposals of this nature, the score is shown as 58.19%, which is above the minimum score of 55% required to achieve 'very good'. As such, a condition (condition 17) requiring the submission of a scheme which sets out how the development will achieve a BREEAM rating of 'very good' in respect of that building and that the development shall then proceed and operate in accordance with that BREEAM scheme is considered to be appropriate.

11.17.4 With regards to buildings that have less than 1000sqm of floorspace, whilst they would not have to achieve a BREEAM 'very good' rating, it is still imperative that they are sustainable and include energy efficiency and renewable energy features and measures to reduce water consumption and adaptations to changing climatic conditions. A suitably worded condition is therefore necessary which requires the submission of a Sustainability Strategy (condition 18).

11.17.5 Given that the application is in outline only, details of the orientation of buildings, passive design and renewable or low carbon design features are not currently available, but are likely to be included at the detailed design stage in order to achieve the required BREEAM rating or included in a Sustainability Strategy.

11.17.6 Any development on the site will have a carbon footprint and will impact on climate change. However, the incorporation of permeable surfaces, green and blue infrastructure and sustainable urban drainage systems would help to minimise and mitigate climate change impacts. Subject to conditions which will influence detailed design and subsequent reserved matters applications, the proposal is considered to be acceptable in relation to climate change and sustainable design.

11.18 Ecology and nature conservation

11.18.1 Para 131 of the National Planning Policy Framework confirms that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Para 174 of the National Planning Policy Framework states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Para 180 confirms that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.

11.18.2 The overarching requirement in Core Strategy Policy CS6 is that green infrastructure is protected, enhanced, created and connected and that all development should incorporate new or enhance existing green infrastructure of an appropriate size, type and standard. CS6 also states that international, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/ species will be required where necessary.

11.18.3 Saved Policy LQ6 requires new development to incorporate appropriate landscaping and benefits to biodiversity wherever possible and that enhances the spaces between and around buildings and streets. LQ6 seeks to retain mature landscape features and habitats of ecological importance, replacement planting and the use of indigenous species and semi-mature species and to ensure that an adequate buffer between obtrusive developments and other uses is provided.

11.18.4 Emerging Policy DM21 requires development proposals to include blue and green infrastructure and to retain features such as trees and hedgerows and increase their cover. Any trees that are to be lost should be replaced on a ratio of 2:1 or contributions made towards off-site tree planting. DM21 encourages landscaped buffers using native species and green walls and roofs. High quality boundary treatments which enable to passage of wildlife such as hedges are also required.

- 11.18.5 Emerging Policy DM35 requires net gains to biodiversity through good design and by incorporating biodiversity enhancements and habitat creation. Development will not be permitted in or adjacent to Sites of Special Scientific Interest where it would adversely affect, directly or indirectly, its wildlife and conservation importance. DM35 also safeguards County Heritage Sites – biological or geological – and other site of importance to nature conservation interests and protected species.
- 11.18.6 The Greening Blackpool Supplementary Planning Document requires development to demonstrate a net gain in biodiversity where opportunities exist and the retention of trees on site. If trees are to be removed, they should be replaced on a ratio of 2:1 or in accordance with the adopted Tree Strategy. Where appropriate, all new non-residential development will be required to provide 1 tree for each 100 square metres of floorspace. If the full provision of tree planting cannot be provided on site, a financial contribution towards off site planting will be required, although this could be negotiated depending on other greening measures such as green roof and walls, or best practice sustainable urban drainage systems with multiple benefits for people and biodiversity.
- 11.18.7 The application is supported by Information in Support of an Appropriate Assessment to inform a Habitats Regulations Assessment. The objective of the Habitats Regulations Assessment is to identify any aspects of the Project that would cause ‘likely significant effects’ on the interest features of European sites, specifically, the Ribble and Alt Estuaries Special Protection Area and the Liverpool Bay Special Protection Area (between 1.4 and 4.5km away from the site).
- 11.18.8 The proposals in the Enterprise Zone have the potential to result in loss of habitat which is functionally linked to the Special Protection Areas through its use by foraging birds (in this case, oystercatcher), disturbance to species and habitats and reduced water quality in the Special Protection Areas.
- 11.18.9 The dominant habitat within the application site is mown amenity grassland used as sports pitches, with smaller areas of poor semi-improved grassland, tree lines and ditches. A number of wintering bird surveys were carried out in 2018 and 2019 and a number of oystercatchers were observed foraging and loafing on the application site. However, the number of birds on the site was less than 1% of the wintering population and the Habitats Regulations Assessment concludes that proposals will not give rise to an adverse effect on the integrity of the Ribble and Alt Estuaries Special Protection Area or Liverpool Bay Special Protection Area either alone or in combination.
- 11.18.10 Natural England notes that the Habitats Regulations Assessment has not been produced by Blackpool Council, but by the applicant and gives advice on the basis that the Council intends to adopt the HRA to fulfil its duty as competent authority. The Greater Manchester Ecology Unit has also previously advised the Council to adopt the submitted Habitats Regulation Assessment. However, the submitted Habitats Regulation Assessment numbered GM10226 RPT-018 dated March 2021 by Wardell Armstrong was also submitted as part of the application for the changing facilities and sports pitches on land to the south (20/0265 refers) and the Habitats Regulation Assessment was adopted by the Council on 7 August 2021.
- 11.18.11 Subject to conditions relating to surface water drainage management and pollution prevention measures set out in the Habitats Regulation Assessment (condition 20), Natural England do not object to the application.

- 11.18.12 The submitted Preliminary Ecological Appraisal acknowledges that as a result of the development, there are ecological features that may be subject to adverse effects in the absence of mitigation, including scattered trees, invasive non-native species (montbretia), amphibians, reptiles, nesting birds and hedgehogs.
- 11.18.13 The Appraisal recommends that trees are retained where possible and that any trees that are removed to facilitate the development, should be replaced. Retained trees should be protected from soil compaction and root damage. Further recommendations include the removal of invasive species, that vegetation clearance works are carried out outside of the nesting bird season and that the landscaping plans should include a range of native, locally grown species. In order to protect amphibians, reptiles, nesting birds and small mammals, precautionary working methods should be implemented and a Precautionary Working Method Statement is required (condition 19).
- 11.18.14 Greater Manchester Ecology Unit accepts that the majority of the site comprise habitats of low ecological value. However, the loss of trees and low value grassland on the site will result in loss of biodiversity, so any landscaping plans should be designed to demonstrate a net gain for biodiversity, in line with the requirements of the National Planning Policy Framework. The Greater Manchester Ecology Unit has recommended that a the submission of a scheme for Biodiversity Mitigation and Enhancement Measures are conditioned (condition 21) and that a Construction Environment Management Plan is also submitted (condition 19) which would include risk assessments, biodiversity protection zones, sensitive working practices, responsible and competent persons on site and the use of fences, barriers and signs. The bat survey found no evidence of bats, however, bats are highly mobile and therefore Greater Manchester Ecology Unit has advised that an informative is also included, setting out what the applicant should do if a bat is found on site during demolition works.
- 11.18.15 With regards to trees, an Arboricultural Impact Assessment has been submitted, which confirms there are no ancient woodlands or veteran trees on the site. However, there are four individual trees, 12 tree groups and two hedgerows on or adjacent to the site. One of the trees is classified as category B and the rest are category C and at least four tree groups, including the category B tree would be lost as a result of the proposed development. The Assessment recommends that compensatory planting is secured and that the tree group identified as G7, along the northern boundary of the site are retained. The Parks Development Manager is requesting that an avenue of trees is planted along the spine road and new roads and landscaping links in with landscaping at the new sports pitches.
- 11.18.16 Landscaping, including tree planting will be considered as part of future reserved matters applications.
- 11.18.17 In light of the above, and subject to the imposition of suitable conditions, no ecological impacts that would weigh against the application are anticipated.

11.19 Visual Impacts

- 11.19.1 The National Planning Policy Framework at paragraph 126 states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development. Paragraph 130 explains that developments should function well and add to the overall quality of an area; be visually attractive and sympathetic to local character and

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

- 11.19.2 Policy CS7 of the Core Strategy relates to quality of design and expects new development to be appropriate in terms of scale, mass, height, layout, density, appearance, materials and relationship to other buildings. Schemes are expected to be safe, accessible, green, adaptive and well-integrated and should not compromise amenity. This policy continues the requirements of Policies LQ1, LQ2, LQ4 and LQ4 of the Local Plan which set out more detailed expectations. Again, these requirements are encapsulated in emerging Policy DM17 of Part 2. Policies LQ4 and DM17 expects facades to be appropriately detailed, address the street and human scale at base-level, and incorporate vertical and horizontal rhythm, texture, depth and detailing and the use high-quality, durable materials that reflect local context.
- 11.19.3 The National Design Guide identifies ten characteristics of good design. These relate to context, identity, built form, movement, nature, public spaces, uses, building details, resources and lifespan. Paragraph 129 of the National Planning Policy Framework states that the National Design Guide should be used to guide planning decisions where no local design guides are in place.
- 11.19.4 This application is in outline with all matters reserved and so issues of scale, layout and appearance are not matters for consideration at this stage. Maximum parameters of scale/height have not been identified but the Design and Access Statement confirms that the scale of development is unlikely to be higher than 2/3 storeys in scale (around 10m) and reflect the scale of existing built development in the Enterprise Zone. For reference, the recently completed Multiply building to the west of the application site is around 9.5m tall.
- 11.19.5 Taller buildings may be appropriate away from residential properties fronting Oakwood Close but the total floorspace for the whole development should not exceed 35,000sqm (3,500 sq.m Business Use Class E, 17,500 sq.m General Industrial Use Class B2, 14,000 sq.m Storage and Distribution Use Class B8) and 275sqm each for the retail and café element. The quantum of floorspace permitted will restrict the scale of the buildings coming forward along with the amount of car parking spaces that could be provided whilst still providing high quality landscaping. As such, it is not considered necessary to restrict the scale of the development other than on the plot closest to residential properties on Oakwood Close.
- 11.19.6 It is not anticipated that the scale of the development would appear unduly incongruous against a back-drop of large commercial units in this edge of urban setting.
- 11.19.7 The character of the site would clearly change from open green space to built development. Nonetheless the nature of the proposed development would fit well with, and continue the character of the surrounding uses on the Enterprise Zone and Squires Gate Industrial Estate. Aside from the Green Belt and adjacent Conservation Area designations, the wider landscape is not designated or considered to be particularly sensitive.
- 11.19.8 The widening of Common Edge Road would result in the loss of some of the grass verges which is unfortunate as the verges benefit visual amenity in the area. However, it is anticipated that the site will be well landscaped and the new spine road would include landscaping buffers and green drainage swales of around 6 metres deep along the majority

of its length. Each plot would also be required to provide landscaping, to soften the development visually and create a good quality public realm.

11.19.9 The construction phase would have an adverse impact on visual amenity, but this is to be expected and would be temporary. However, it is considered that for each element of the development, good quality design solutions can be secured to meet the expectations of planning policy at reserved matters stage and there is no reason to assume that the operational phase would not have a positive visual impact on the area.

11.20 Overall sustainability and planning balance appraisal

11.20.1 Sustainability comprises economic, environmental and social components.

11.20.2 Economically, the scheme would deliver significant economic benefits in providing opportunities for new business to operate and in Blackpool, which will help diversify and grow the local economy and provide additional and diverse employment opportunities during both construction and operational phases. The development would provide critical infrastructure and improve access which could not otherwise be achieved and would support future phases of employment development on the Enterprise Zone, enabling more businesses to locate in Blackpool and future job creation. The development would contribute to the strategic requirement to safeguard around 180ha of employment land and would present quality employment development to help meet Blackpool's future employment needs and to support sub-regional growth and these issues weigh heavily in the planning balance.

11.20.3 The retail and café element of the scheme could draw some footfall away from nearby local centres, but not to any significant degree given the proximity of the out-of-centre food and retail offer at Morrisons.

11.20.4 The demolition of 2 School Road would have a negligible economic impact in itself, although its removal to facilitate wider infrastructure improvements associated with the delivery of the Enterprise Zone would have indirect economic benefits.

11.20.5 Environmentally, it is considered that biodiversity value and environmental quality could be adequately safeguarded and enhanced through use of conditions. A suitable drainage solution for the site could equally be developed and implemented based on sustainable urban drainage system infrastructure. Landscaping and tree planting would be agreed as a reserved matter.

11.20.6 With regard to impact on climate change, a development of this scale will inevitably have a significant carbon footprint and this impact must weigh against the proposal in the planning balance. However, the buildings on the site must either achieve BREEAM 'very good' or comply with a Sustainability Strategy, to be submitted and agreed by condition so the buildings would be sustainably designed. The inclusion of green and blue infrastructure would also provide some mitigation and help protect against some of the impacts of climate change, as would the consideration of surfacing materials. Electric Vehicle charging and cycle infrastructure would be secured by condition, along with Travel Plans and a Public Transport Strategy and these measures would limit the environmental impact of the development and are considered to weigh in favour of the scheme.

11.20.7 Subject to conditions, no unacceptable impacts on air or water quality and further investigations/ remedial work and mitigation would mean there would be no risks to water

quality or human health from contaminated land.

- 11.20.8 In terms of visual impact, there is no reason to assume that the development would not be well designed and suitably enhanced by green infrastructure.
- 11.20.9 Socially, the scheme would generate a significant number of jobs and improve skills and these jobs are likely to be more stable than those typically generated in the tourism sector. Given deprivation levels related to skills, employment and income in Blackpool, this consideration weighs strongly in favour of the application.
- 11.20.10 Despite mitigation, noise and vibration are anticipated to have an adverse impact during construction and highway works for nearby residential development and existing uses on the Enterprise Zone. This is to be expected with a development of this scale given the activities on site. During the operational phase of development it is anticipated that the conditions proposed would avoid unacceptable impact. Conditions restricting the height of the development closest to residential uses would prevent any unacceptable levels of overshadowing or loss of light.
- 11.20.11 During the construction phases and works to the local highway network in particular, there may be some inconvenience to the local community using Common Edge Road/School Road/Jepson Way/Division Lane and Amy Johnson Way but this would be a short term inconvenience and does not weigh substantively in the planning balance.
- 11.20.12 The majority of the site is currently designated Green Belt and most of what is proposed is by definition, harmful to the Green Belt and so this weighs against the proposal. However, given that Part 2 is at a very advanced stage, and removes the Green Belt designation and allocates the site as employment land, the fact that this has been supported by an independent Inspector, the lack of objection to the removal of the site from the Green Belt and the very special circumstances outlined in this report, it is considered that these factors weigh more heavily in the planning balance than the current, soon to be removed Green Belt designation.
- 11.20.13 The existing open space, playing pitches and facilities have already been replaced to the south of the applications site and to a better standard so the communities that use the facilities would not be disadvantaged. The spine road would also improve access to the sporting facilities.
- 11.20.14 Subject to further detailed design, the function and safety of the local highway network would be maintained. Flood risk has been appropriately addressed through the application and the imposition of conditions is considered to be sufficient to prevent an increase in flood risk off-site. Land that is currently contaminated would be remediated and these factors weigh in favour of the application.
- 11.20.15 The built form on the Enterprise Zone and the demolition of 2 school Road would result in less than substantial harm the character or significance of the Marton Moss Conservation Area and any harm is clearly outweighed by the public benefits of the proposal. No unacceptable impacts on archaeological remains are anticipated.
- 11.20.16 In light of the above, and on balance, the scheme is considered to represent sustainable development and be sufficiently in accordance with the aims and objectives of the Development Plan for planning permission to be granted.

11.21 Other considerations

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

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

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

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

12.0 LEGAL AGREEMENTS

12.1 A legal agreement would be required between the Council and Blackpool Transport in relation to a bus route through the Enterprise Zone. The mechanism of how a bus route would be secured, would be agreed by condition as part of the Public Transport Strategy. Various other Highway agreements may be required to deliver off-site highway works although their exact nature is unknown at the time of writing.

13.0 FINANCIAL CONSIDERATIONS

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

14.0 CONCLUSION

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

15.0 RECOMMENDATION

15.1 In light of the above, Members are respectfully recommended to support the proposal and grant outline planning permission for the development subject to the following suite of conditions. Given that the development proposed is technically a departure from the Development Plan in advance of the formal adoption of Part 2 as the site includes Green

Belt, playing pitches and public open space, it is necessary to refer the application to the Secretary of State for his consideration.

16.0 Conditions

1 (i) Approval of the following details (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority:

- Access
- Layout
- Scale
- Appearance
- Landscaping

(ii) Applications for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission and the development hereby permitted shall be begun not later than the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason for (i) and (ii): This is an outline planning permission and these conditions are required to be imposed pursuant to Section 92 of the Town and Country Planning Act 1990 (as amended).

2 The development shall be carried out, except where modified by the conditions attached to this permission, in accordance with the planning application received by the Local Planning Authority including the following plans and information:

Location plan ref. P3_L01 Rev B recorded as received by the Council on 31/08/2022
Proposed site area plan ref. P3_P01 Rev C recorded as received by the Council on 31/08/2022
Proposed Highway Phasing Plan ref. P3_P04 Rev A recorded as received by the Council on 31/08/2022

The development shall thereafter be retained and maintained in accordance with these approved details.

Reason: For the avoidance of doubt and so the Local Planning Authority can be satisfied as to the details of the permission.

3 The development hereby approved shall not exceed the following quantum or floorspace:

35,000 sq.m of employment use comprising:

- 3,500 sq.m Business Use Class E(g) (10%);
 - 17,500 sq.m General Industrial Use Class B2 (50%);
 - 14,000 sq.m Storage and Distribution Use Class B8 (40%);
- 275sqm retail floorspace (Class E(a));
275sqm cafe floorspace (Class E(b)).

Excluding those for the retail and cafe floorspace, each reserved matters application shall state the proposed floorspace and what elements will be Class E(g), B2 or B8.

On the basis of the floorspace described above, the development is not considered to give rise to any likely significant effects on the local highway network and is not considered to be 'EIA development' under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended.

- 4 Other than essential infrastructure associated with the new spine road and any works to the highways, the development hereby permitted shall not be commenced until the playing fields and sports facilities permitted by planning permissions 20/0108 (Blackpool Council) dated 25 August 2020, 20/0114 (Fylde Council) dated 26 June 2020, 20/0564 (Blackpool Council) dated 10 August 2021 and 20/0677 (Fylde Council) dated 8 June 2022 have been implemented in full and made available for use.

Reason: To ensure the satisfactory quantity, quality and accessibility of compensatory playing fields and sports provisions and to secure its continuity of use to in accordance with Policies CS6, CS12 and CS15 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies BH7 and BH21 of the Blackpool Local Plan 2001-2016 and Policy DM37 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and guidance in the NPPF.

- 5 Other than works to the existing highways, no development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination and landfill gas at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation and mitigation strategy giving full details of the remediation and mitigation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation and mitigation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons: To ensure a safe form of development that poses no unacceptable risk to human health and that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in accordance with Policies CS7 and CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy BH4 of the Blackpool Local Plan 2001-2016, emerging policies DM31, DM35 and DM36

of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and paragraph 174 of the National Planning Policy Framework.

- 6 Prior to any part of the development hereby permitted being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reasons: To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete in accordance with Policies CS7 and CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy BH4 of the Blackpool Local Plan 2001-2016, emerging policies DM31, DM35 and DM36 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and paragraph 174 of the National Planning Policy Framework.

- 7 Other than works to the existing highways:

(a) Prior to the commencement of development;

(i) a programme of gas monitoring shall be submitted to and agreed in writing by the Local Planning Authority. For the purpose of this condition, the gas monitoring must be carried out over a period of at least three months and include at least three readings where the atmospheric pressure is below 1000mb and gas flow rates;

(ii) the programme of gas monitoring agreed pursuant to part (a)(i) of this condition shall be carried out and a risk assessment of the results undertaken to determine the risk of gas ingress shall be submitted to and agreed in writing by the Local Planning Authority; and

(iii) where the assessment required pursuant to part (a)(ii) of this condition indicates a need for gas protection measures, details of these measures shall be submitted to and agreed in writing by the Local Planning Authority.

(b) Prior to first use of the development the gas protection measures required pursuant to part (a)(iii) of this condition these shall be implemented in full and in full accordance with the approved details, and evidence of such shall be submitted to and agreed in writing by the Local Planning Authority.

Reason: In order to safeguard future and nearby residents and users from ground gas in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy BH4 of the Blackpool Local Plan 2001-2016 and Policy DM36 of the Local Plan Part 2: Site Allocations and Development Management document.

- 8 (a) Prior to or concurrent with the submission of any reserved matters application, details of the provision of an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained shall be submitted to and agreed in writing by the Local Planning Authority;

(b) Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking/servicing areas shall pass through the interceptor agreed pursuant to section (a) of this condition.

(c) Vehicle washdown water and detergents should not be passed through any interceptor.

Reasons: To ensure that the development does not contribute unacceptable levels of water pollution in accordance with Policies CS7 and CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy BH4 of the Blackpool Local Plan 2001-2016, emerging policies DM31, DM35 and DM36 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and paragraph 174 of the National Planning Policy Framework.

- 9 No part of the development hereby approved shall be occupied until all of the Hazardous Substances Consents for Unit 15, Squires Gate Industrial Estate, Squires Gate Lane FY4 3RN have been revoked or varied in accordance with the Planning Hazardous Substances Act 1990, as amended, such that the Land Use Planning advice team of the Health and Safety Executive does not advise that permission should be refused on safety grounds, and written confirmation of the necessary revocation or variation has been issued by the Blackpool Council as Hazardous Substances Authority.

Reason: In the interests of health and safety, it is necessary to ensure that the adjoining major hazard site will not present a risk to safety.

- 10 Other than works to the existing highways, no development shall commence until details of the means of ensuring the water main that is laid within the site boundary would be protected from damage arising from the development have been submitted to and approved by the Local Planning Authority in writing. The details shall outline the potential impacts on the water main from construction activities and the impacts post completion of the development on the water main infrastructure that crosses the site and identify mitigation measures to protect and prevent any damage to the water main both during construction and post completion of the development. Any mitigation measures shall be implemented in full in accordance with the approved details.

Reason: In the interest of public health and to ensure protection of the public water supply.

- 11 All development on the site shall proceed in accordance with the site specific mitigation measures set out in Section 5.1 of the Wardell Armstrong Air Quality Assessment GM12206/0003 dated April 2019.

Reason: In the interests of the health and amenities of the occupiers of the development and nearby residents in respect of air quality, in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies BH4 of the Blackpool Local Plan 2001-2016 and emerging Policy DM36 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and guidance in the NPPF.

- 12 (a) Prior to commencement of development on each plot, an Air Quality Impact Assessment shall be submitted to and agreed in writing by the Local Planning Authority. This Assessment shall identify appropriate mitigation measures to off-set any deterioration in air quality and implemented within an agreed timeframe.

(b) The development shall thereafter proceed and be operated in full accordance with the Assessment agreed pursuant to part (a) of this condition.

Reason: In the interests of the health and amenities of the occupiers of the development and nearby residents in respect of air quality, in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies BH4 of the Blackpool Local Plan 2001-2016 and emerging Policy DM36 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and guidance in the NPPF.

13 Prior to commencement of development on each plot:

(a) a noise survey shall be undertaken to determine the impact from the development on the nearest sensitive sites and shall be submitted to and agreed in writing by the Local Planning Authority. The noise survey shall use the baseline background data identified within the submitted Wardell Armstrong Noise report, GM10226-0020/FINAL, March 2022 unless otherwise agreed in writing with the local planning authority;

(b) in the event that the noise survey required pursuant to part (a) of this condition identifies a need for mitigation, a scheme for the provision of noise attenuation to ensure that the following cumulative noise levels are not exceeded shall be submitted to and agreed in writing by the Local Planning Authority:

- 35dB LAeq (16hr) from 0700 to 2300 within living rooms
- 30dB LAeq (8hr) from 2300 to 0700 within bedrooms
- 45dB LAFmax from 1900 to 0700 for single sound events within bedrooms
- 50dB LAeq (16hr) from 0700 to 2300 for outdoor living areas
- The evening standard LAFmax will only apply where the evening LAFmax significantly exceeds the LAeq and the maximum levels reached are regular in occurrence, for example several times per hour.

(c) the noise attenuation scheme agreed pursuant to part (b) of this condition shall be implemented in full and in full accordance with the approved details and shall thereafter be retained and maintained as such.

Reason: In order to safeguard the amenities of nearby residents in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 and Saved Policy BH3 of the Blackpool Local Plan 2001-2016.

14 Foul and surface water shall be drained on separate systems.

Reason: To secure proper drainage and to manage the risk of flooding and pollution in accordance with Policy CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Policy DM31 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and the Blackburn, Blackpool and Lancashire Flood Risk Management Strategy.

15 Other than works to the existing highways, prior to the commencement of development, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes must include:

(i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;

(ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);

(iii) Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD; and

(iv) Incorporate mitigation measures to manage the risk of sewer surcharge where applicable.

The approved schemes shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.

Prior to occupation of the proposed development, the drainage schemes shall be completed in accordance with the approved details and retained thereafter for the lifetime of the development.

Reason: To promote sustainable development, secure proper drainage of sewage and surface water and to manage the risk of flooding and pollution in accordance with the provisions of the NPPF and NPPG and Policy CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Policy DM31 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and the Blackburn, Blackpool and Lancashire Flood Risk Management Strategy.

16 Prior to occupation of any part of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and

b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To manage flooding and pollution and to ensure that a managing body is in place for the sustainable drainage system and there is funding and maintenance mechanism for the lifetime of the development in accordance with Policy CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 and Policy DM31 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

17 (a) Prior to or concurrent with the submission of reserved matters applications for each building over 1,000sqm in floorspace, a scheme which sets out how the development will achieve a BREEAM rating of 'very good' in respect of that building shall be submitted to and agreed in writing by the Local Planning Authority.

(b) The development shall thereafter proceed and be operated in full accordance with the BREEAM scheme agreed pursuant to part (a).

Reason: In order to maximise the environmental sustainability of the development and limit the potential impact of the proposal on climate change in accordance with the provisions of Policy CS10 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027.

18 Prior to or concurrent with the submission of reserved matters applications for each building of less than 1,000sqm in floorspace, a Sustainability Strategy shall be submitted to and agreed in writing by the Local Planning Authority. This strategy shall;

- specify energy efficiency measures to be used within the building
- specify renewable energy features
- specify measures to reduce water consumption

The development shall thereafter proceed and be operated in full accordance with agreed the Sustainability Strategy.

Reason: In order to ensure that the development contributes to sustainability and supports the Council's wider objectives and commitments relating to environmental quality and climate change in accordance with Policy CS10 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027.

19 Other than works to the existing highways, no development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements including a Precautionary Working Method Statement).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: In order to safeguard biodiversity in accordance with Policy CS6 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ6, NE4 and NE6 of the Blackpool Local Plan 2001-2016, Policy DM35 of the Blackpool Local Plan: Part 2 - Site Allocations and

Development Management Policies document and paragraph 174 of the National Planning Policy Framework.

- 20 In order to mitigate any adverse effect on nearby designated sites, the development hereby approved shall proceed in full accordance with the mitigation measures set out in Sections 7.2.8 to 7.2.12 of the submitted Information In Support Of An Appropriate Assessment (HRA) by Wardell Armstrong, dated March 2021.

Reason: To ensure there are no adverse effects via water quality on designated sites in accordance with Policy CS6 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies NE4 and NE6 of the Blackpool Local Plan 2001-2016, Policy DM35 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and section 15 of the National Planning Policy Framework.

- 21 Prior to or concurrent with the submission of any reserved matters for each plot, a scheme for Biodiversity Mitigation and Enhancement Measures shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full and in full accordance with the approved details prior to first occupation of the that element of the development (or in accordance with a phasing plan which shall first be agreed in writing with the local planning authority) and shall be retained thereafter.

Reason: In order to safeguard and enhance biodiversity in accordance with Policy CS6 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ6 and NE6 of the Blackpool Local Plan 2001-2016, Policy DM35 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document and paragraph 174 of the National Planning Policy Framework.

- 22 No trees or hedgerows shall be felled or cleared during the main bird nesting season (March to September inclusive) unless written confirmation of the absence of nesting birds by a suitably qualified and experienced ecologist has been submitted to and agreed in writing by the Local Planning Authority.

Reason: In order to safeguard biodiversity in accordance with Policy CS6 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy LQ6 and NE6 of the Blackpool Local Plan 2001-2016 and Policy DM35 of the Local Plan Part 2: Site Allocations and Development Management document.

- 23 No development shall take place until a Demolition/Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Demolition/Construction Management Plan shall include and specify the provision to be made for the following:

- dust mitigation measures during the demolition/construction period
- control of noise emanating from the site during the demolition/construction period
- hours and days of demolition/construction work for the development
- contractors' compounds and other storage arrangements
- provision for all site operatives, visitors and construction loading, off-loading, parking and turning within the site during the demolition/construction period

- arrangements during the demolition/construction period to minimise the deposit of mud and other similar debris on the adjacent highways
- measures to prevent contamination of surface and sub-surface water bodies during the demolition/construction period
- routing of construction traffic

The demolition/construction of the development shall then proceed in full accordance with the approved Demolition/Construction Management Plan.

Reason: In the interests of the amenities of surrounding residents and to safeguard the character and appearance of the area in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies AS1, LQ1 and BH3 of the Blackpool Local Plan 2001-2016 and Policy DM35 of the Local Plan Part 2: Site Allocations and Development Management document.

24 (a) Prior to the commencement of development, a scheme of detailed highway works shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall detail:

- 1) footpaths and cycle ways
- 2) review of measures to discourage HGV's from using less appropriate routes, including School Road
- 3) proposed extents of public highway
- 4) proposed extents and status of other public space
- 5) proposed extents of privately controlled space
- 6) provision of street furniture and new structures such as bus stops
- 7) provision of traffic regulation orders
- 8) provision of highway signage

(b) The highway works and traffic regulation measures agreed pursuant to part (a) of this condition shall be implemented in full and in full accordance with the approved details prior to the first use of the development hereby approved. Those aspects that are not adopted by the Local Highway Authority shall thereafter be retained and maintained as such.

Reason: In the interests of highway safety and to ensure safe and convenient access to the site in accordance with Saved Policies AS1 and AS2 of the Blackpool Local Plan 2001-2016 and Policy DM41 of the Local Plan Part 2: Site Allocations and Development Management document.

25 For all plots, parking provision shall include:

- accessible parking equivalent to 10% of the total provision
- motorcycle parking at a ratio of 1 space per 25 parking spaces provided.

Reason: In order to ensure that adequate parking provision is available to meet the needs of the development in the interests of the appearance of the area and highway safety in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ1 and AS1 of the Blackpool Local Plan 2001-2016 and Policies DM17 and DM41 of the Local Plan Part 2: Site Allocations and Development Management document.

- 26 7.5KWh EV charging points shall be installed within the car parking area for each plot with the minimum number being 10% of the overall car parking provision for each plot.

Reason: In order to encourage travel to and from the site by a sustainable transport mode and in the interests of air quality in accordance with Policy CS27 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

- 27 As part of the reserved matters application for each plot:
(a) details of secure cycle storage provision to include the type of cycle stand and the form and materials of a waterproof cover and enclosure shall be submitted to and agreed in writing by the Local Planning Authority; and
(b) the cycle storage agreed pursuant to part (a) of this condition shall be implemented in full and in full accordance with the approved details.

Reason: In order to encourage travel to and from the site by a sustainable transport mode in accordance with Policy CS27 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

- 28 As part of the reserved matters application for each building with 1,000sqm of floorspace or more, shall include details of changing and showering facilities. The agreed changing and showering facilities shall be provided and thereafter retained.

Reason: In order to encourage travel to and from the site by walking and cycling in accordance with Policy CS27 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

- 29 (a) No plot shall be occupied until a travel plan has been submitted to and agreed in writing by the Local Planning Authority.

The travel Plan shall include:

- Contact details of a named Travel Plan Co-ordinator
- Results from travel survey
- Details of existing cycling, pedestrian and public transport infrastructure
- Details of the provision of cycle parking and changing facilities
- Objectives
- SMART Targets for non-car modes of travel, taking into account the baseline data from the survey
- Action plan of measures to be introduced, and appropriate funding
- Details of arrangements for monitoring and review of the Travel Plan for a period of at least 5 years

(b) The development hereby approved shall then proceed and be operated in full accordance with the approved Travel Plan.

Reason: In order to encourage travel to and from the site by sustainable transport modes in accordance with Policy CS27 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Local Plan Part 2: Site Allocations and Development Management document.

30 Prior to or concurrent with the submission of any reserved matters application for each plot, a Servicing Plan shall be submitted to and agreed in writing by the Local Planning Authority. The agreed plan shall detail;

- loading and unloading arrangements for servicing vehicles
- manoeuvring provision for servicing vehicles
- hours of servicing, collections and deliveries

The development shall thereafter operate in full accordance with the approved Servicing Plan.

Reason: In order to ensure safe access to and egress from the each site is available in the interests of highway safety in accordance with the provisions of Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ1, BH3 and AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Local Plan Part 2: Site Allocations and Development Management document.

31 Notwithstanding the submitted details, a strategy to provide a bus service through the development for a minimum of five years shall be submitted to and agreed by the Local Planning Authority prior to the occupation of any part of the development hereby approved.

The Strategy should include an estimation of potential public transport use generated by the existing and proposed floorspace within the Enterprise Zone based on:

- a survey of existing employees on the Enterprise Zone to understand the current demand and any barriers to using public transport; and
- justified estimation of employee numbers relative to floorspace delivery
- justified prediction of modal share including potential implementation of best-practice measures to encourage sustainable travel
- a phasing scheme indicating at what quantum of floorspace delivery or number of employees a bus service would be introduced; and
- a funding mechanism; and
- a legal mechanism for its implementation

The agreed Public Transport Strategy shall then be implemented in full and in full accordance with the agreed details.

Reason: In order to encourage travel to and from the site by a sustainable transport mode in accordance with Policy CS27 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy AS1 of the Blackpool Local Plan 2001-2016 and Policies DM36 and DM41 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

32 As part of the reserved matters application for each plot:

(a) details of refuse storage provision to include size, design and materials shall be submitted to and agreed in writing by the Local Planning Authority; and

(b) the refuse storage agreed pursuant to part (a) of this condition shall be implemented in full and in full accordance with the approved details.

Reason: In the interest of the appearance of the site and locality and to safeguard the amenities of nearby residents in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ1 and BH3 of the Blackpool Local Plan 2001-2016 and Policy DM17 of the Local Plan Part 2: Site Allocations and Development Management document.

33 Prior to the installation of any external lighting, details of the lighting shall be submitted to and agreed in writing by the Local Planning Authority and the development shall thereafter proceed in full accordance with these approved details. For the purpose of this condition, the details shall include the form, design, materials and technical specification of the lighting and a lux plan to show the resulting area of light-spill and upward lighting ratio. All lighting shall be designed to maintain the amenity of residential neighbours, ensure highway safety and protect ecology by preventing excessive light spill.

Reason: In the interest of the appearance of the site and locality and to safeguard the amenities of nearby residents in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 and Saved Policies LQ1 and BH3 of the Blackpool Local Plan 2001-2016 and Policy DM36 of the Blackpool Local Plan: Part 2 - Site Allocations and Development Management Policies document.

34 No goods, materials or waste shall be stored or displayed outside any buildings.

Reason: In the interests of the appearance of the Enterprise Zone in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy LQ1 of the Blackpool Local Plan 2001-2016 and Policy DM17 of the Local Plan Part 2: Site Allocations and Development Management document.

35 No construction of buildings shall commence on site, unless there has been submitted to and approved in writing by the Local Planning Authority either:

a) detailed plans for the proposed buildings in that individual phase, demonstrating that there would be no detrimental impact upon the operation of the St. Annes SSR Radar; OR

b) details of a 'Radar Mitigation Scheme' (including a timetable for its implementation during construction) to mitigate any detrimental impact upon the St. Annes SSR Radar.

Where a 'Radar Mitigation Scheme' has been required, no construction higher than 3m above ground level shall take place on site, unless the 'Radar Mitigation Scheme' has been implemented. Development shall not take place other than in complete accordance with such a scheme as approved unless the planning authority and NATS (En-route) PLC have given written consent for a variation.

Reason: In the interests of Air Traffic Safety and of the operations of NATS En-route PLC, in accordance with Saved Policy AS7 of the Blackpool Local Plan 2006-2016 and Policy DM42 of

the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies document.

- 36 Prior to the demolition of no. 2 School Road, details regarding the state in which the site is to be left, including finished surfaces and any enclosure of the site along with a timetable for implementation, shall be submitted to and agreed in writing by the Local Planning Authority and the development shall proceed in full accordance with these approved details.

Reason: In the interests of the appearance of the site in the streetscene and the character, appearance and significance of the Marton Moss Conservation Area, in accordance with Policies CS7 and CS8 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ1 and LQ10 of the Blackpool Local Plan 2001-2016 and Policy DM27 of the Local Plan Part 2: Site Allocations and Development Management document.

- 37 The elevations of the buildings on the plots directly adjacent to the boundary with nos. 1-9 Oakwood Crescent that directly face those properties shall not exceed 10m in height.

Reason: In the interests of residential amenity in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policy BH3 and BH4 of the Blackpool Local Plan 2001-2016 and Policy DM36 of the Local Plan Part 2: Site Allocations and Development Management document.

- 38 Prior to the first occupation or use of any part of the development hereby approved:

(a) a landscaping scheme shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall include tree planting along the spine road and a full planting schedule detailing native plant species and initial plant sizes, numbers and densities;

(b) the landscaping scheme agreed pursuant to part (a) of this condition shall be implemented in full and in full accordance with the approved details; and

(c) Any trees or plants planted in accordance with this condition that are removed, uprooted, destroyed, die or become severely damaged or seriously diseased within 7 years of planting shall be replaced within the next planting season with trees or plants of similar size and species to those originally required unless otherwise first submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure that the site is satisfactorily landscaped in the interests of visual amenity, to ensure there are adequate areas of soft landscaping to act as a soakaway during times of heavy rainfall and in the interests of achieving net gains for biodiversity in accordance with Policies CS7 and CS9 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027, Saved Policies LQ1 and LQ6 of the Blackpool Local Plan 2001-2016 and Policies DM17, DM21, DM31 and DM35 of the Blackpool Local Plan Part 2 - Site Allocations and Development Management Policies document.

ADVICE NOTES TO DEVELOPERS

Whilst the buildings to be demolished have been assessed as very low risk for bats, the applicant is reminded that under Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 it is an offence to disturb, harm or kill bats. If a bat is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed.

Waste to be taken off site – advice to applicant

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with the Environment Agency as a hazardous waste producer. Refer to the hazardous waste pages on gov.uk for more information.

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on gov.uk