

Independent Examination of the Fylde Council Local Plan

Blackpool Council (Representor No.4) Statement in response to the Inspector's Matters, Issues and Questions (Stage 2 Hearing Sessions)

Thank you for the opportunity to respond to the Matters, Issues and Questions for the Stage 2 Hearing Sessions. Please find the responses of Blackpool Council below in relation to the questions relating to policies H4 and EC4/T3.

Matter 5 – Housing – Site Allocations and Delivery

Policy H4 - Affordable housing

It has been suggested that Policy H4 should be amended so that residential developments at the Fylde-Blackpool periphery should provide financial contributions for affordable housing to be spent in Blackpool. Has this approach been considered by the Council and is it reasonable?

No additional comments. Please refer to our response dated 22 September 2016 to the Publication version of the Fylde Local Plan in relation to this issue.

Matter 7 – The Economy – Site Allocations and Delivery

Policies EC4 and T3 – Blackpool Airport Enterprise Zone

Do the policies support delivery of the objectives and purposes of the Enterprise Zone designation and the long term operation of the airport? Would the relocation of the aviation functions closer to the runway and within the Green Belt be justified? Is the inclusion of 'enabling development' appropriate and justified?

A number of minor modifications are now proposed in relation to policy EC4.

The following minor modifications are supported:

- Minor Modification MNR022, which refers to the development sectors targeted by the Enterprise Zone and reflects our comments made at Publication stage.
- Minor Modification MNR023, which ensures that employment uses are not defined as enabling development and reflects our comments made at Publication stage.

However, we would like to reiterate the concerns we made in our response dated 22 September 2016 in relation to the identification of retail and leisure as potential enabling development on the site due to the potential negative impacts on Blackpool town centre, the resort core and resort regeneration. There may be a case for limited retail in the form of bulky



goods, or other uses that are less well suited to a town centre location (for example garden centres), but the provision of units for retail uses that are normally appropriate in a town centre location would not be acceptable and would be contrary to the provisions of the National Planning Policy Framework.

It is essential that policies EC4 and T3 are consistent with each other and provide a positive policy framework that provides sufficient clarity to support the objectives and purposes of the Enterprise Zone designation and to ensure that the future use of the airport and runway are not compromised.

Policy EC4 is supportive of the relocation of operational buildings and facilities closer to the main runway, which is in the Green Belt. Therefore, the policy appears to support operational airport development in the Green Belt. Subject to certain criteria, this could be permitted development under Part 8, Class F, of the General Permitted Development Order 2015. However, paragraph 12.39 of the supporting text to Policy T3 suggests that Green Belt land is not necessary for such operational development, which appears inconsistent with the approach taken in Policy EC4. Therefore, we suggest that this text in paragraph 12.39 is deleted to ensure consistency and to provide greater flexibility in terms of the development of the airport.

In addition, the wording of policies EC4 and T3 in relation to operational airport development needs greater clarity. The text in both policies appears supportive of airport related development “*unless* there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt”. This wording is confusing and does not appear necessary as policy on development in the Green Belt is set out in the National Planning Policy Framework and permitted development rights for development at an airport are set out in the General Permitted Development Order 2015.

The relocation of the operational aviation functions closer to the runway and within the Green Belt is needed to deliver the targets that are required for the Enterprise Zone to promote sustainable growth and will be justified through the Enterprise Zone Masterplan and Delivery Plan to be agreed with the Department of Communities and Local Government in September 2017.

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