

# **Independent Examination of the Fylde Local Plan**

Hearing Statement submitted by The Strategic  
Land Group Ltd (Representor No. 59)

**Session 1: Objectively Assessed Housing and  
Economic Development Needs**

November 2017

**1. Is the OAHN range justified and supported by robust evidence? In particular:**

**(d) Other representors suggest that an allowance for additional jobs growth at the Enterprise Zones should be taken into account in the assessment. Does the evidence support such an allowance? Does the Council's economic strategy rely on growth at the Enterprise Zones? Are the economic and housing strategies aligned within the plan?**

**Background**

- 1.1 This question is covered in our response to the Additional Evidence consultation in August 2017. Since that response was submitted, further information has come to light regarding the council's plans for the Enterprise Zone (EZ) at Blackpool Airport.
- 1.2 To date, the council's approach to the EZs in the Fylde Local Plan (FLP) has been, in effect, to assume they will make no contribution to the borough's economy over the FLP period. That is despite them being a key part of the council's economic strategy<sup>1</sup> and being positively allocated for the economic growth and development in the plan.
- 1.3 Our consultation response explained at paragraphs 2.22 to 2.31 why that view is not sound. These additional submissions should be considered in conjunction with those arguments.
- 1.4 The council have been dismissive of the concerns raised by SLG and others about the treatment of the EZs.
- 1.5 Specifically, in the Summary of Responses to the Evidence Consultation (EL7.003h), the council comment that "It is not considered there is yet sufficient evidence to make a specific adjustment to the baseline employment forecasts. The Council will monitor this position as new evidence emerges." (p. 6).
- 1.6 The council go on to say that "The evidence from Amion states that an allowance would not be justified; therefore the assessment has been made. To make an additional adjustment would be an "act of faith" which the Council considers unwarranted." (*ibid.*, p. 11).
- 1.7 As explained in our previous submission, Blackpool Council have recently purchased some of the land within the Blackpool Airport Enterprise Zone (BAEZ). It is perhaps a moot point whether a council can invest public money simply as an "act of faith."

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<sup>1</sup> See page 2 of the Blackpool and Fylde Framework for Inclusive Growth and Prosperity (July 2016) which identifies the Enterprise Zone as genuine opportunities to generate thousands of job in the decades ahead.

## Blackpool Airport Enterprise Zone

1.8 Further evidence as to the deliverability of the BAEZ was provided on 9 November 2017, when Fylde and Blackpool councils jointly commenced a consultation exercise considering a proposed Masterplan for the site. Copies of those consultation documents are included at Appendix A of this statement.

1.9 The introductory text to the consultation document explains that:

*“The Masterplan seeks to achieve the vision to ‘make Blackpool Airport Enterprise Zone a premier business location in the North West, where high quality businesses facilitate economic growth and employment, and further develop the strong skills and knowledge base of the Fylde Coast.”* (introduction)

1.10 The document goes on to acknowledge the aim to increase the number of jobs on the site by 3,000 in the period 2016–2041 by making over 260,000m<sup>2</sup> of potential floor space available (p. 1). The proposed mix and size of the units is based on a detailed analysis of current and potential markets around the BAEZ (p. 10).

1.11 The consultation document is optimistic about the prospects for the BAEZ noting that:

*“The Enterprise Zone at Blackpool Airport is more generalised in its sectors and purpose than other Enterprise Zones in Lancashire, which puts it in a strong position to attract growing businesses from a wide sectorial and geographical range.”* (p. 1)

1.12 It also confirms the significant effect that the BAEZ could have, explaining that the masterplan is intended to help the BAEZ together with the Hillhouse Technology EZ “fulfil their potential in transforming the economy of the Fylde Coast.” (p. 1)

1.13 Helpfully, the consultation document (p. 9) includes a proposed timeline for the delivery of the BAEZ masterplan as follows:

- Phase 1 (2018-23)
- Phase 2 (2023-30)
- Phase 3 (2030-38)

1.14 The accompanying phasing plan, reproduced at figure 1, shows how that phasing would relate to the site area.



*Figure 1: Proposed Phasing Plan for BAEZ.*

- 1.15 Although this masterplan is still just a consultation document, it demonstrates the commitment of both Blackpool and Fylde councils to take concrete steps to ensure the BAEZ delivers the employment space and jobs they desire.
- 1.16 It also recognises that the generalised nature of the BAEZ gives it an advantage in delivering that growth.
- 1.17 This contrasts starkly with the council’s view that there is insufficient evidence that the EZ will be delivered and that any adjustment is an “act of faith.”

### **The housing and economic impact**

- 1.18 Although it is clear there are now firm plans for delivery of the BAEZ, this is only of significance if its impact would render the FLP unsound.
- 1.19 There is presumably detailed modelling and design work behind the draft masterplan, which the councils have not made publicly available. However, from the information in the consultation document, it is possible to make an approximate assessment of the impact of the BAEZ’s delivery.
- 1.20 Although the consultation documents do not include areas for the various development phases, the phasing plan at figure 1 indicates phase 3 is the smallest.
- 1.21 An assumption that 2/3 of the site will be delivered during the FLP period is therefore cautious, as Phase 2 is scheduled to be complete by 2030, well before the end of the FLP period in 2032. Using the same principle of caution, it is

reasonable to assume that 2/3 of the anticipated jobs will be delivered by the end of the FLP period. Using the figures from the consultation document, that would therefore equate to an additional 2,000 jobs over and above the councils' current plans.

- 1.22 At this point, it is noted that the council, in its response to Matter 3<sup>2</sup>, seeks to assert that the BAEZ would create jobs for existing Blackpool residents that are unemployed owing to the cross boundary position of the Enterprise Zone.
- 1.23 However, the housing requirement adopted in Blackpool already assumes that there will need to be in-migration to support jobs growth due to the aging population.<sup>3</sup> According to the latest data from NOMIS<sup>4</sup>, there are currently 3,800 unemployed residents of Blackpool (5.9% of the workforce, compared to a regional average of 4.7% and a national average of 4.6%). As noble as the aspiration to create jobs for those people is, to assert that it is an adequate number of people to require any adjustment to the housing target is, at best, disingenuous. It is certainly not substantiated by any evidence.
- 1.24 The assertion is also at odds with Fylde council's view that no adjustment is needed to the housing target. While a proportion of new jobs may well be absorbed by existing unemployed residents (from both Blackpool and Fylde), the FLP should be planning positively for this additional jobs growth.
- 1.25 Detailed economic modelling would be needed to ascertain the exact number of new homes that jobs increase would equate to. However, it is possible to make an indicative assessment using the information contained in the Turley SHMA Addendum 3 (EL7.002 Annex 1 Appendix 1). Addendum 3 considers how two different jobs growth scenarios would translate into housing need as follows:
- 1.25.1 Paragraph 4.28 – 900 jobs = 397-408 dpa.
- 1.25.2 Paragraph 4.30 – 1,500 jobs = 421-432 dpa.
- 1.26 In that case, an extra 600 jobs equals an extra 24 dpa. Assuming a linear relationship, an extra 2,000 jobs would therefore equate to an extra 80 dpa (or an extra 1,680 dwellings across the 21 year FLP period).
- 1.27 These jobs, and the associated homes, will impact the Housing Market Area (HMA) overall, and not just Fylde. However, Blackpool have an adopted Plan with no scope to increase their delivery of homes. Wyre have published a draft Plan which confirms they cannot meet their own Objectively Assessed Housing Need (OAHN). Responsibility for the delivery of those additional homes therefore falls to Fylde, where there are still a number of deliverable sites available.

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<sup>2</sup> See paragraph 23.10a of Fylde Council Matter 5 response (EL2.05C)

<sup>3</sup> Report on the Examination into the Blackpool Local Plan, November 2015, para 26 (See Appendix 2)

<sup>4</sup> See Appendix 3.

- 1.28 Finally, it is worth reiterating that this assessment takes no account of the impact of any employment growth in the Warton EZ. The consequential impact on the housing requirement can therefore be considered to be extremely conservative.

### **Implications**

- 1.29 The council base their view that no adjustment should be made to the housing target to reflect the potential of the EZs on Amion Consulting's "Independent Assessment of the Economic Prospects of Fylde" (EL7.002 Annex 1 Appendix 2). This assessment was made at a moment in time and, as the council themselves recognise, it is necessary to "monitor this position as new evidence emerges" (EL7.003h p. 6)
- 1.30 Since the Amion report was prepared, there have been two material changes in circumstances pertaining to the BAEZ.
- 1.30.1 Blackpool Council have purchased significant parts of the BAEZ to facilitate its delivery.
- 1.30.2 Blackpool and Fylde councils have published a Masterplan for consultation.
- 1.31 These two changes cannot be ignored. There can be no doubt that there is now a high probability that the BAEZ will deliver significant economic growth during the FLP period. The implications of that need to be reflected in the housing target.
- 1.32 As it stands, the FLP cannot be considered to be sound. It is not consistent with national policy (including paragraphs 21 and 47 of the National Planning Policy Framework), it is not justified by the evidence, and it will not be effective in either meeting the need for housing or supporting planned economic growth.
- 1.33 Indeed, given the potential cross-boundary impacts of the EZs, including the BAEZ, and the accepted difficulty of other authorities in the HMA delivering further homes, the FLP would result in negative economic consequences for other local authorities too.
- 1.34 In order for the FLP to be made sound, the housing target will need increasing. That is likely to result in the need for further development sites to be allocated in order to ensure housing need is met. The requirement for further sites will be compounded by our concerns expressed elsewhere regarding both the lack of flexibility in the FLP and its failure to reflect the need to assist Wyre Council in delivering their OAHN.

# Appendix 1

**Blackpool Airport Masterplan Consultation Documents, November 2017**



# Blackpool Airport Enterprise Zone Masterplan

Draft for Consultation

November 2017

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# **Blackpool Airport Enterprise Zone Masterplan**

Draft for Consultation

November 2017

## Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
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BAEZMP02	November 2017	HJ	DC	KR	Draft for Consultation
BAEZMP03	November 2017	HJ	DC	KR	For Consultation

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### Consultation on the Blackpool Airport Enterprise Zone Masterplan

The BAEZ is centered on the existing Squires Gate and Blackpool Business Park employment areas, and much of the operational infrastructure of Blackpool Airport is included. The BAEZ covers an area of 144 Ha (much larger than many of the UKs other EZs) straddling the boundary between the Borough of Fylde (55% of the site area) and Blackpool (45% of the site area), much of the site sits within designated greenbelt and has multiple stakeholders with approaching 40 freehold and long leasehold property interests and over 200 occupiers.

The Masterplan seeks to achieve the vision “to make Blackpool Airport Enterprise Zone a premier business location in the North West, where high quality businesses facilitate economic growth and employment, and further develop the strong skills and knowledge base of the Fylde Coast.”

Blackpool and Fylde Councils are seeking views on the Masterplan from **Thursday 9<sup>th</sup> November until Thursday 21<sup>st</sup> December 2017**. This summary document to support the Masterplan has been produced to provide consultees with an understanding of the process behind the development of the Masterplan. Further details about the Masterplan are available online at [www.blackpool.gov.uk/airportez](http://www.blackpool.gov.uk/airportez) or [www.fylde.gov.uk/airportez](http://www.fylde.gov.uk/airportez)

If you wish to make comments please email [planning@blackpool.gov.uk](mailto:planning@blackpool.gov.uk) or [planning@fylde.gov.uk](mailto:planning@fylde.gov.uk)

# 1 Introduction

Blackpool Airport became an Enterprise Zone in 2016 and the status remains active until 2041. Financial incentives, in the forms of Business Rates Relief (until March 2022) and Enhanced Capital Allowances (until November 2023), are in place to encourage businesses to invest and expand, with the aim of increasing the number of jobs on the site by 3,000 over the 25-year lifespan of the Enterprise Zone, in addition to the 1,800 jobs already on the site. There will be over 260,000 sq m of potential floor space available on the site for development, conversion or repurposing.

The targeted sectors for jobs growth are in Energy, Aviation, Advanced Manufacturing, Food and Drink Manufacturing and Digital and Creative sectors and back office administration. The runway itself is not included within the Enterprise Zone so as not to preclude future development of this for larger commercial aircraft.

The first stage in developing the Masterplan was to undertake a baseline assessment of the existing site, covering land use, planning policy considerations, environment, utilities, drainage, access and movement, and an initial structural assessment of the large former Wellington Bomber Factory which occupies 102,000 sq m at the prime north-eastern corner of the site. The baseline assessment identified key issues and constraints at the Enterprise Zone.

The Masterplan has been developed at the inception of the Enterprise Zone status period to act as a guide for the delivery of the Enterprise Zone during its lifespan. As the site evolves, updated iterations of the Masterplan will be produced every five years to ensure the Masterplan accurately reflects and supports Enterprise Zone development. The Masterplan presented here is an indicative vision of the scale and nature of the Enterprise Zone in 2041. It will not all be delivered immediately but will be done gradually throughout the lifetime of the Enterprise Zone. In reality it is likely that some elements of the Enterprise Zone site will be delivered differently from how they are presented here, according to the needs of businesses and developers on the site.

Alongside the Masterplan there will be a Delivery Plan to ensure Blackpool Airport Enterprise Zone, along with its sister site at Hillhouse Technology Enterprise Zone, fulfil their potential in transforming the economy of the Fylde Coast. The Enterprise Zone at Blackpool Airport is more generalised in its sectors and purpose than other Enterprise Zones in Lancashire, which puts it in a strong position to attract growing businesses from a wide sectorial and geographical range.

It should be understood that this Masterplan is not set in concrete. Rather it provides a framework to maximise the delivery of the potential of the Enterprise Zone to provide confidence for businesses and investors. It also gives plenty of scope for stakeholders and potential businesses to engage with the Masterplan and contribute to the final shape of this extraordinary site.

## 2 Blackpool Airport Enterprise Zone Masterplan

This section sets out the vision and objectives of the masterplan for Blackpool Airport Enterprise Zone. The objectives focus on the key pillars of urban design and masterplanning; namely use, form, space and movement.

### The Vision

Our masterplan has been formed with the aim of realising the following vision:

**“To make Blackpool Airport Enterprise Zone a premier business location in the North West, where high quality businesses facilitate economic growth and employment, and further develop the strong skills and knowledge base of the Fylde Coast.”**

The Enterprise Zone will build upon:

- its location within one of Europe's leading economic regions and within the Lancashire Advanced Manufacturing and Energy Cluster – a key part of the Northern Powerhouse
- its legacy, as an operational airport, to connect Blackpool globally
- its proximity to Blackpool town centre and links to skills, knowledge and services
- a growing knowledge base delivered from the state of the art Blackpool and Fylde College Lancashire Energy HQ within the Enterprise Zone
- its excellent accessibility from the M55 and improving public transport connectivity (via tram, rail and bus)
- its proximity to an internationally significant energy and chemical industries cluster (the Energy Coast)
- its coastal setting and links to both Blackpool and Lytham St Annes.

### Objectives

The following objectives have been set out to help deliver the Vision. These are:

- **Objective 1: Meeting the Demand from a Diverse Range of Sectors** - To continually adapt the masterplan in a planned manner through the promotion of distinct character areas which meet the demand of modern businesses and industries from a diverse range of sectors.
- **Objective 2: Improving Accessibility** - To provide a fully connected business and industrial park which provides enhanced transport infrastructure with an emphasis on sustainable transport, which increases accessibility to, and navigation in, the Enterprise Zone.
- **Objective 3: Delivering Critical Infrastructure** - To ensure that utilities and other business critical infrastructure is competitive with the premier business locations nationally and internationally and seeks out low carbon alternatives.
- **Objective 4: Marketing and Promotion** - To maintain high levels of new investment in Blackpool and Fylde through strong branding and marketing which promotes the Enterprise Zone and the centre of Blackpool as a leading location for inward investment.
- **Objective 5: Supporting Competitive Businesses, Knowledge and Innovation** - To provide supporting actions which help existing and new companies to improve their competitiveness and create an environment for exchange of ideas where future knowledge is captured for sustainable growth within the region.
- **Objective 6: Create an Active, Productive and Liveable Environment** – To deliver a high quality and sustainable urban environment where cutting-edge architecture is complimented with healthy, safe and connected spaces to create an interesting, active and engaged place to work and do business.
- **Objective 7: Protect the Airport's Future** – To support the ongoing operation and expansion of the airport which acts as a catalyst for the rapidly growing energy sector, a significant contributor to the economy of the Fylde Coast.

## 25 Year Masterplan for Blackpool Airport EZ (Draft)



## 3 Planning Considerations

The following provides a summary of the existing planning position in Fylde and Blackpool, a summary of the key planning issues for the wider airport site and an overview of the proposed planning strategy.

### Development Plan

The Development Plans and Planning Policy Framework that are relevant for the entire Blackpool Airport Enterprise Zone consists of:

1. The Blackpool Part 1 Core Strategy (January 2016) and the ‘saved’ policies of the Blackpool Local Plan 2001-2016 (June 2006); and
2. The Fylde Borough Local Plan (altered October 2005) comprising the Fylde Borough Local Plan 1996-2006 and the Fylde Borough Local Plan Alterations Review 2004-2016.

Blackpool and Fylde Councils are at different stages of progressing new Development Plan Documents that will replace some existing and saved policies. A summary of these are as follows:

- **Blackpool Local Plan Part 2 ‘Site Allocations and Development Management’ document (“SADPD”)** – the SADPD is in the early stages of preparation and was subject to public consultation for 6 weeks which ended on 24<sup>th</sup> July 2017. The Council is currently considering responses made to this consultation.
- **New Fylde Local Plan 2032 (“FLP”)** – the new FLP which is at advanced stage of preparation. On 9<sup>th</sup> December 2016, a submission version of the FLP was submitted to the Secretary of State for Independent Examination. The Examination into the Local Plan commenced in March 2017, with a second round of hearing sessions in June 2017. A third round of hearing sessions is due to take place on 12<sup>th</sup> December 2017.

### Key Planning Issues and Strategy

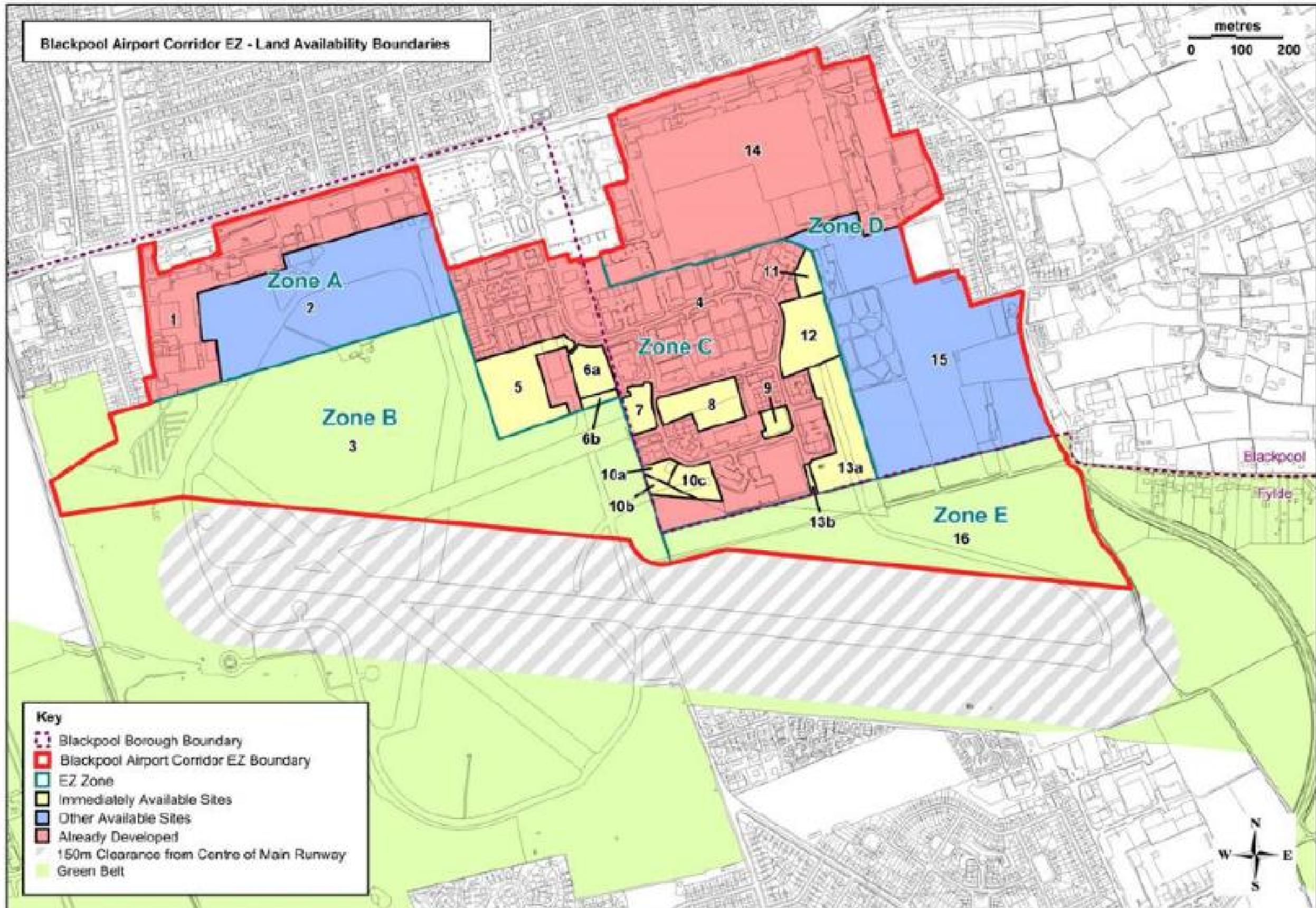
There are several planning policy issues which have informed the evolution of the masterplan and which will drive a more practical planning strategy as the masterplan is implemented via a series of future planning applications.

Enterprise Zones are a long-term policy initiative from the government to support economic business growth through offering financial incentives, simplified planning procedures, and excellent quality broadband and other infrastructure. These are summarised below in relation to each zone of the masterplan.

#### Zone A

The emerging Fylde Local Plan is proposing to introduce a Blackpool Airport Enterprise Zone (Policy EC4), a Blackpool Airport policy (Policy T3) and site-specific employment policy (Policy EC1, Site ES5); which will form the framework within which detailed planning applications for development will be brought forward in this zone. The Fylde Local Plan to 2032 is at an advanced stage of preparation and, following Public Examination and the publication of an Inspectors Report, will carry significant weight for the implementation of the Airport Masterplan.

These policies seek to safeguard Zone A for predominantly employment use, however, Policy EC1 could support ‘enabling development’ where alternative uses such as retail, employment and leisure may be appropriate; where it can be demonstrated that they meet a number of policy tests – including supporting the delivery of aviation uses, minimising the impact other town/retail centres and where there are no sequentially preferable sites (as set out in NPPF policy). As such, any non-employment uses in Zone A will need to demonstrate that it addresses these policy tests in the new FLP as detailed applications for planning are brought forward.



## Zone B

Zone B is in the Green Belt in both the current and emerging Fylde Local Plan. Whilst the Green Belt is subject to significant protection, the area of Green Belt to the north of the existing runway is well contained and does not significantly contribute to the openness or character of the Green Belt to the south of Blackpool.

The emerging Airport related policies in the FLP, including Blackpool Airport Enterprise Zone (Policy EC4) and a Blackpool Airport policy (Policy T3) could support applications for 'airport related development' where Very Special Circumstances ("VSC") for Green Belt development can be demonstrated. The VSC case would need to be built around the relocation of airport operations being critical to the ongoing and future operation and growth of the Airport.

The strategy for the development of this area could be two-fold (dependent on the scale and phasing of development):

- **Permitted Development Rights** – there are some limited Permitted Development Rights, under Part 8 (Class F) of the General Permitted Development Order (2015), related to Airport Development which allows for ***“the carrying out on operational land by a relevant airport operator or its agent of development (including the erection or alteration of an operational building) in connection with the provision of services and facilities at a relevant airport”***. Therefore, there could be the scope to bring forward some limited operational development that falls under Class F of the GPDO. However, whilst this may be applicable to some limited airport operations, more substantial airport or other (non-essential) development would likely require planning permission.
- **Planning permission on Green Belt land (with a case for VSC)** – this would include operational development which extends beyond the provisions of the GPDO but it can be demonstrated that it is required for the continued growth and success of the Airport and a where a strong case could be made for Very Special Circumstances (as set out in Policies TS3 and EC4).

In summary, given the scale of development of Airport operations proposed in the Green Belt, a planning application which makes the case for VSC would likely

be the most appropriate strategy to bring forward a comprehensive relocation of airport related operations in Zone B.

## Zone C

Part of Zone C, to the west adjacent to the current taxiways is proposed to be safeguarded for Airport operational uses under Policy T3 of the emerging Fylde Local Plan. A small part of Zone C (in the south westernmost corner) is designated as Green Belt, but this is not proposed for development in the masterplan.

The remainder of Zone C is designated for employment uses in the extant Blackpool Local Plan and planning applications would need to be brought forward which consider the provisions of these employment policies. Given the early stage of preparation of the Blackpool SADPD, there may be a potential to further define and shape the type of uses in this area as the SADPD is developed.

## Zone D

The timing and implementation of Blackpool SADPD will be critical to the implementation and phasing of the masterplan in Zone D. It will be important for planning policy to support the masterplan and remove or amend restrictive planning designations where necessary. The key issues in relation to Zone D are as follows:

### *a) Green Belt and Protected Open Space*

The entirety of the Common Edge Playing Fields are designated as Green Belt land under saved Policy NE1 (Green Belt) of the Blackpool Local Plan and Policy CS6 (Green Infrastructure) of the Blackpool Core Strategy. They are also designated as protected public open space including Policy CS6 (Green Infrastructure) of the 2016 Core Strategy and saved Policy BH5 (Protection of Public Open Space) of the Blackpool Local Plan 2001-2016.

It is important that, as the new Blackpool SADPD is developed, that this land is promoted for release from the Green Belt through this development plan document. A case can be made that this land does not currently fulfil the

purposes of including land in the Green Belt (as set out in the NPPF) and the existing playing field provision is proposed to be re-provided on land to the south of the existing playing fields (to an equivalent or better standard); in line with the requirements of both Sport England and the NPPF. In line with the masterplan this land should be promoted in the SADPD for:

- Employment uses;
- Residential use (on the parcel of land adjacent to Common Edge Road); and
- Playing fields (to the south of the current site, within the Green Belt).

The current timetable for the adoption of a new SADPD (and when this land could potentially be released from the Green Belt) is late 2019.

#### *b) Infrastructure*

Providing enabling infrastructure (i.e. access) in the Green Belt if the designation remains/prior to any removal of its Green Belt status may be acceptable under the provisions of Paragraph 90 of the NPPF, which states that *“local transport infrastructure which can demonstrate a requirement for a Green Belt location”*. Therefore, a planning application for a first phase of development could include the required road infrastructure required to act as a catalyst for the development.

#### *c) Employment uses*

Land to the north of Zone D is designated for employment uses in the extant Blackpool Local Plan and there may be a potential to further define and shape

the type of uses in this area through the emerging policies in the emerging Blackpool SADPD.

#### Zone E

Zone E is in the Green Belt in both the current and emerging Fylde Local Plan. The masterplan proposes new sports provision (i.e. relocated from Zone D) in this location. This is in line with the provisions of Paragraph 89 of the NPPF which allows in the Green Belt *“provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it”*.

In accordance with the NPPF and Sport England guidance, any lost provision at Common Edge should be replaced by equivalent or better provision in terms of quantity and quality in Zone E (and partially in Zone D).

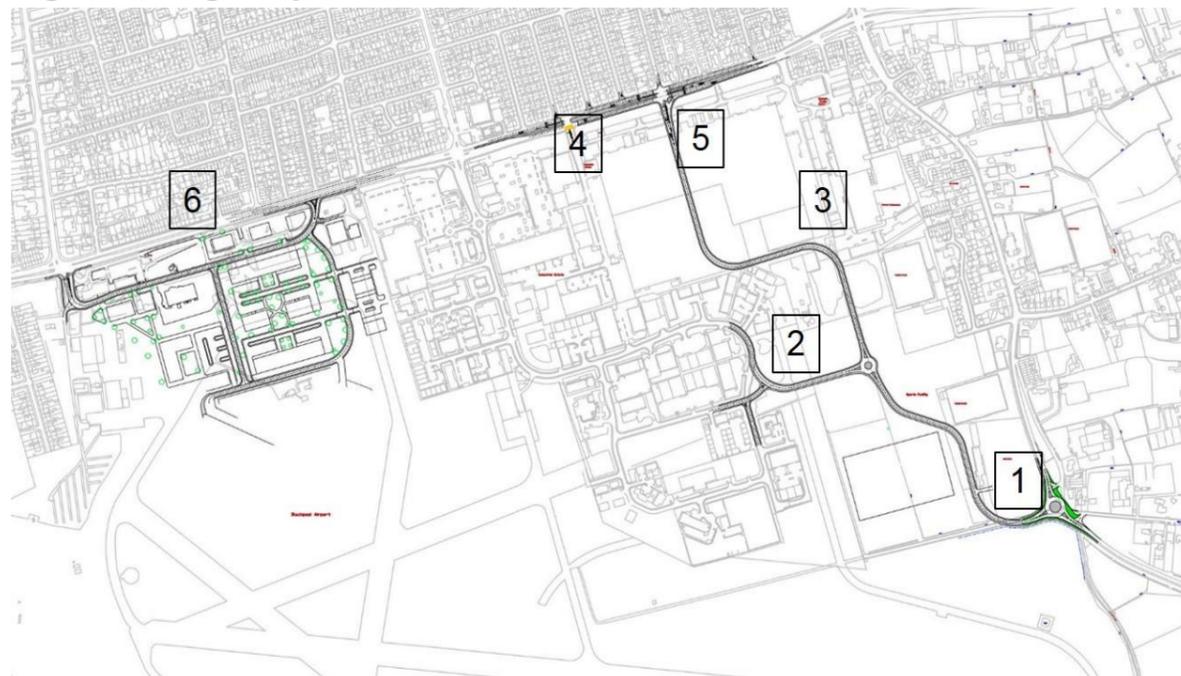
It should be noted that any proposed lighting / structures may impact on the openness of the Green Belt and may also impact on regulations in relation to Aerodrome Safeguarding that seek to protect the safety of airport operations.

## 4 Access and movement

At present, access into and movement within the Enterprise Zone site is constrained due to a small number of access points into the site and no connecting roads between different parts of the site. Therefore, the key aim of the access and movement strategy is to open up access to all parts of the site to unlock parcels of land which are currently not accessible so that they can be developed.

Key highways interventions at Blackpool Airport are shown in Figure 1 and explained below.

**Figure 1: Highways interventions**



Source: Mott MacDonald

1. New roundabout at Queensway
2. Link from new spine road to Amy Johnson Way
3. New spine road from roundabout to Squires Gate Lane
4. Remodelling of junction to allow right turns

5. New junction for spine road with Squires Gate Lane, and closure of existing Sycamore Avenue junction
6. New access point into western end of site and loop road

The new spine road through the site will create a through-route for traffic, thus reducing pressure on the surrounding highways network. Crucially, it will also make public transport (bus) routes through the site more viable due to removing the need for buses to turn around within the site. There is potential for the Blackpool Transport Services' bus depot to be housed on the site in the short term, further increasing the viability of bus routes serving the site.

Access to the Enterprise Zone will be further enhanced by a new highway which is planned to be built between Junction 4 of the M55 and Lytham St Annes, which will have a second section of road running westwards to Queensway, thus facilitating direct access between the Enterprise Zone and the motorway network. The phasing of the Enterprise Zone Masterplan works will complement the construction of this new highway, which is expected to begin in 2018 and could open in late 2019 or early 2020.

The improvements to the highway network around the Enterprise Zone will not only benefit access into and movement within the Enterprise Zone; there will be benefits for the wider highway network, through reduced pressure on pinchpoints and junctions and improved access to the existing retail park. Additionally, Enterprise Zone infrastructure will support development of airport and accommodate additional developments in the business park.

In the longer term, there is scope for the Blackpool tram network to be extended beyond its current terminus at Squires Gate and connect in to the heavy rail line which runs to Lytham St Annes. This could interface with the airport and Enterprise Zone through the provision of a new or relocated tram/train station.

To improve pedestrian and cycle movements within the Enterprise Zone, new linkages between the airport business park (western part of site) and the existing retail park are included in the Masterplan.

## 5 Land uses

The study team has examined the potential land use opportunities within the Blackpool Airport Enterprise Zone, through researching the current and potential markets in and around the Airport, which are summarised below:

Land Use	Market Opportunities	Location Characteristics	Potential Unit Sizes (sqm)	Timing
<b>Office</b>	<ul style="list-style-type: none"> <li>Complements EZ target sectors.</li> <li>Short to medium term prospects for serviced office.</li> <li>Longer term opportunities for larger, corporate occupiers.</li> <li>Limited developer interest in building on a speculative basis.</li> </ul>	<ul style="list-style-type: none"> <li>Throughout EZ</li> <li>Close to services/ public transport</li> <li>Green space desirable</li> </ul>	<ul style="list-style-type: none"> <li>Large buildings: 1,500 - 2,500 sqm with individual units at 50-200sqm.</li> </ul>	<ul style="list-style-type: none"> <li>Short term for small units.</li> <li>Ongoing requirement for small to medium premises</li> </ul>
<b>Industrial/ Warehouse</b>	<ul style="list-style-type: none"> <li>Strong interest in B2 manufacturing</li> <li>High quality, clean industrial space.</li> <li>Hybrid office/industrial spaces.</li> <li>Limited activity in warehousing/storage</li> <li>Positive market for manufacturing and engineering.</li> <li>Open air/storage areas for large plant and equipment</li> </ul>	<ul style="list-style-type: none"> <li>Throughout EZ</li> <li>24/7 operations</li> <li>Capacity for oversized vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>&lt;1,000 sqm units available for lease</li> <li>Design and build opportunities for larger industrial units 2,000 – 3,000 sqm &amp; 5,000 - 10,000 sqm</li> <li>0.5-1.5 ha open storage plots</li> </ul>	<ul style="list-style-type: none"> <li>Immediate industrial growth</li> <li>Ongoing demand for premises in EZ</li> <li>Plots for larger requirements needed immediately</li> <li>Medium term for open storage</li> </ul>
<b>Bus Depot</b>	<ul style="list-style-type: none"> <li>Essential relocation of bus depot</li> <li>EZ identified as one of few locations for depot</li> </ul>	<ul style="list-style-type: none"> <li>Easy access to Squires Gate Ln</li> <li>Large vehicle turning access/ capacity</li> </ul>	<ul style="list-style-type: none"> <li>3-4 ha</li> <li>Storage for ~120 buses</li> </ul>	<ul style="list-style-type: none"> <li>Medium term, temporary requirement</li> <li>One-off requirement</li> </ul>
<b>Retail</b>	<ul style="list-style-type: none"> <li>Targeting new worker population.</li> <li>Further retail should be provided within/adjacent to EZ.</li> <li>Long retail opening hours (24 hour).</li> <li>No supermarket requirement.</li> <li>Take away, Fast food and small specialists desired</li> </ul>	<ul style="list-style-type: none"> <li>High visibility and accessibility.</li> <li>On main thoroughfares of EZ.</li> <li>Car Parking</li> </ul>	<ul style="list-style-type: none"> <li>Takeaway: 100 sqm</li> <li>Fast food/ coffee: 200-300 sqm</li> <li>Small stores: 250 sqm</li> </ul>	<ul style="list-style-type: none"> <li>Medium Term.</li> </ul>
<b>Gym/ Other Leisure</b>	<ul style="list-style-type: none"> <li>Demand for budget gym.</li> <li>High performance gyms in longer term.</li> </ul>	<ul style="list-style-type: none"> <li>Require residential population</li> <li>Support working population</li> <li>Standalone facilities</li> <li>24 hour operation</li> </ul>	<ul style="list-style-type: none"> <li>200-400 sqm</li> <li>High performance: up to 1,200 sqm</li> </ul>	<ul style="list-style-type: none"> <li>Immediate opportunity for budget/small format gym</li> <li>May be preferred to wait until sporting fields are established.</li> </ul>

<b>Car Showroom</b>	<ul style="list-style-type: none"> <li>· Sufficient presence of established showrooms along Amy Johnson Way, though potential for relocation to a more prominent site</li> </ul>	<ul style="list-style-type: none"> <li>· Main arterial locations</li> <li>· Heavily trafficked</li> <li>· Squires Gate Ln frontage</li> </ul>	<ul style="list-style-type: none"> <li>· 0.3 - 1.5 ha</li> </ul>	<ul style="list-style-type: none"> <li>· Medium</li> <li>· Medium to long term requirement for relocation/upgrade of existing showrooms</li> </ul>
<b>Pubs/ Restaurants</b>	<ul style="list-style-type: none"> <li>· Strong prospects on eastern side of EZ in longer term</li> <li>· To serve residential market and passing trade/ workers</li> </ul>	<ul style="list-style-type: none"> <li>· High footfall required (close to retail).</li> <li>· Stand alone premises</li> <li>· Car parking essential</li> </ul>	<ul style="list-style-type: none"> <li>· 200-600 sqm</li> </ul>	<ul style="list-style-type: none"> <li>· Medium to longer term</li> </ul>
<b>Residential</b>	<ul style="list-style-type: none"> <li>· Existing dwellings near EZ boundaries</li> <li>· Residential demand in area is solid, though not recommended as a core component on the EZ</li> <li>· Targeting family market</li> </ul>	<ul style="list-style-type: none"> <li>· Fringes of EZ</li> <li>· Quiet, low traffic streets</li> <li>· East of EZ, south of existing residential</li> </ul>		<ul style="list-style-type: none"> <li>· Short to Medium term</li> </ul>
<b>Training college</b>	<ul style="list-style-type: none"> <li>· Potential for FE training college (positioned differently to Energy HQ) targeting industry sectors of the EZ</li> </ul>	<ul style="list-style-type: none"> <li>· Close to core EZ uses</li> <li>· Good public transport access</li> </ul>	<ul style="list-style-type: none"> <li>· Up to 3,000 sqm</li> <li>· Engineering, lab, teaching spaces</li> </ul>	<ul style="list-style-type: none"> <li>· Long term</li> </ul>
<b>Hotel</b>	<ul style="list-style-type: none"> <li>· Positioned for the business market in the area.</li> <li>· Would require significant further growth to support, given there is an existing hotel near the EZ.</li> </ul>	<ul style="list-style-type: none"> <li>· Major road frontage</li> <li>· Car parking</li> <li>· Connectivity to core EZ areas</li> </ul>	<ul style="list-style-type: none"> <li>· 50-80 rooms</li> </ul>	<ul style="list-style-type: none"> <li>· Long term</li> </ul>

This review of potential land uses at the Enterprise Zone has been used as input into the development of the masterplan, including phasing of its development. Key findings are:

- There is a need for a range of unit sizes suitable for B2 manufacturing. While traditionally the majority of the B2 market is for units of less than 1,000 sqm, there is emerging interest from businesses requiring larger unit sizes, spurred by the Enterprise Zone designation. There is a need to provide land plots that would be suitable for a range of manufacturing unit sizes up to 25,000 sqm.

- The demand for office space in the local market will remain focused on smaller units. Therefore, the masterplan includes provision for plots that allow for the development of multi-unit office buildings. It is considered there is a longer-term opportunity for larger, single-occupier office schemes as the Enterprise Zone achieves more momentum.
- The need for the provision of further employment land is immediate, with serviced sites within the Enterprise Zone being very limited.
- The range of supporting facilities identified above would improve the overall vitality and mix of the Enterprise Zone, making it more attractive to potential core occupiers and investors.

## 6 Utilities

The assessment of the baseline conditions at Blackpool Airport Enterprise Zone found that the site is well serviced by utilities, with gas, electricity, water, telecommunications and drainage all present. Water supply and drainage, and electricity were identified as in need of investment in expansion to sufficiently meet the extra demand generated by development at Blackpool Airport Enterprise Zone.

With energy generation being one of the key employment sectors on the Fylde Coast, there is potential for a dual purpose to be achieved, through creating new employment opportunities and generating increased energy to meet the needs of the businesses on the site.

The minimum utilities requirements to cater for the increased demand generated by expansion and development on the site are:

- One primary sub-station to serve new development on former playing fields (Zone D)
- Two secondary sub stations
- Reinforcement of existing utilities within business park
- Two new utility ring mains to serve redeveloped airport and expansion of business park to east. The utility ring mains will provide gas, water, drainage, and telecoms.



**3D Visualisation of Blackpool  
Airport Enterprise Zone after full  
Implementation of Masterplan**

## 7 Masterplan Principles and Character

The proposed masterplan offers a premier environment to do business; arriving at Blackpool Enterprise Zone you will encounter an accessible business park with a mixture of business tenants. The high quality public realm and optimised highway network will deliver an enhanced place to do business, attend seminars and work, or simply pass through. The state of the art buildings within the Enterprise Zone will be responsive to the business needs of the new tenants and the surrounding retail, education, leisure and residential context – making the most of what Blackpool has to offer.

### Key Principles

The key overall principles of the masterplan are:

- Create an enhanced frontage along Squires Gate Lane defined by a new gateway entrance opposite Lindale Gardens
- Deliver a statement building at the new gateway entrance to create a sense of arrival and define the site as a landmark business park
- Prioritise the creation of a new access off Queensway/ Common Edge Road (B5261) to improve connectivity through the site
- Deliver a double-sided, tree lined boulevard through the eastern section of the site connecting Common Edge Road and Squires Gate Lane to increase movement and act as multi-modal primary corridor through the Enterprise Zone
- Deliver active movement through the site via connected pedestrian and cycle networks which link the western and eastern sections of the site to provide sustainable internal and external movement
- Optimise the existing business park at Amy Johnson Way through enhanced connections to the wider transport network and the delivery of currently vacant or inefficient sites
- Relocate the existing airport operation to the south to make way for a new business and industrial offer based around the Lancashire Energy HQ
- Deliver a 'third-space' at the eastern entrance to the site offering sports, leisure, retail and conferencing facilities to encourage activity, networking and engagement within the Enterprise Zone – as well as acting as a secondary gateway to the site from the east
- Deliver a common theme of quality in buildings, landscape, public realm and highway design
- Connect the Enterprise Zone to the town centre and the surrounding context with permeable edges communicating the site is open for business and knitting the site into its surroundings
- Safeguard the future operation of the airport and establish future development trigger based on passenger/operator demand
- Achieve high levels of sustainability and well-being through increased active travel, public transport links, sustainable energy production and active uses – as well as responding to and considering the environmental impact of the surrounding area



### 3D Visualisation of Blackpool Airport Enterprise Zone after full implementation of Masterplan



## Masterplan Character Areas

The masterplan has been defined into six distinctive but interconnecting character areas which define the future of the Enterprise Zone.

- **Innovation Gateway** – Advanced manufacturing and business at the primary entrance to the Enterprise Zone
- **Industrial Heart** – Growth of industry and storage at the heart of the Enterprise Zone
- **Third Space** – Secondary gateway to the site offering active leisure, sport, amenity and networking based uses to offer services and activities for businesses and the community
- **Business Hub** – Development and optimisation of the existing business operation on Amy Johnson Way
- **Airport Zone** – Re-establish Blackpool Airport as a consolidated and active airport offering business, freight and commuter travel to a global client base
- **Knowledge Quarter** – A premier business park and knowledge park offering links to education (B&F College) and business (the energy and airport sectors).



### Innovation Gateway

Key principles:

- Create a sense of arrival and clearly identify the Enterprise Zone as a premier business park
- Improve perception and visibility of the site through high quality architecture, active frontages and landscaping
- Maintain existing set-backs to make way for drainage service lines but increase visual link to site through reduced tree line and improved public realm at Squires Gate Lane
- Connect to Industrial Heart, Business Hub and Third Space via a new central boulevard and connect to the retail park and Knowledge Quarter via legible pedestrian and cycle corridors.

## Industrial Heart

### Key principles:

- Deliver an active and efficiently designed industrial centre within the business park offering logistics, industrial and support services
- Locate within easy reach of retail, leisure and amenity (within Third Space)
- Set back large industrial properties from boulevard and public space
- Establish a pedestrian link to the east linking new and existing communities into the Enterprise Zone

## Third Space

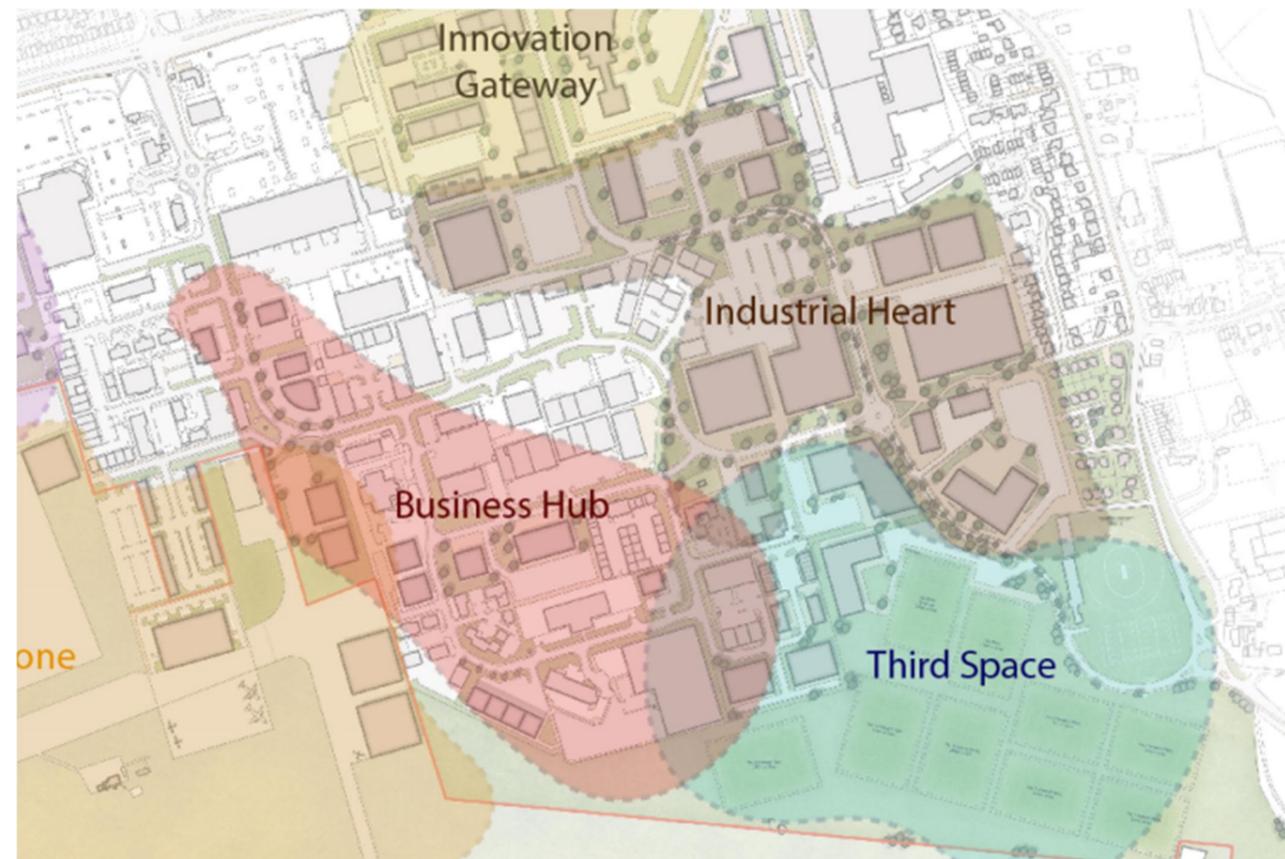
### Key principles:

- Relocate existing playing fields to south and create two new 3G pitches (including potential relocation of AFC Blackpool)
- Create a small high street adjacent to a new roundabout at the centre of the Enterprise Zone offering retail, cafes and other amenities to businesses and local communities
- Establish a new sports club adjacent to 3G pitches with changing, events and conferencing facilities (including a café/ bar) to act as a hub for business and other users of the site
- Delivery a 'softer' edge to the site to address the surrounding semi-rural context

## Business Hub

### Key principles:

- Deliver high quality development within existing vacant sites on Amy Johnson Way
- Optimise existing plots and highway layout to maximise the potential of the site
- Increase connectivity with the growing Enterprise Zone and the retail park to the north.



## Airport Zone

Key principles:

- Relocate and consolidate airport operations to the south
- Deliver high quality business, commuter and energy focused airport service
- Establish clearly defined airport edge with a new airport terminal and car park
- Clear signage and building orientation to increase visibility of the site and mark its position within the Enterprise Zone.



## Knowledge Quarter

Key principles:

- Grow a high quality office, R&D and industrial offer around the existing Blackpool and Fylde College Lancashire Energy HQ
- Focus growth around key aviation and energy industries, as well as educational facilities
- High quality environmental setting with green movement corridors linking Squires Gate Lane to the airport
- Create a new entrance off Squires Gate Lane to improve movement through the site and define a gateway into the Knowledge Quarter
- Reduce set back to Squires Gate Lane to address the frontage with active business operation and improve the sense of arrival into the site.

### ***3D Visualisation of Business Hub, Industrial Heartland, and Innovative Gateway***



## 8 Phasing and Delivery

Blackpool Airport’s Enterprise Zone status is valid for 25 years, from 2016 to 2041 and delivery of the Masterplan will be phased over a significant proportion of the EZ’s lifespan. There are three distinct and overlapping delivery phases:

- Phase 1 (2018 – 2023)
- Phase 2 (2023 – 2030)
- Phase 3 (2030 – 2038).

The areas covered by each phase of the Masterplan are shown in the figure to the right.

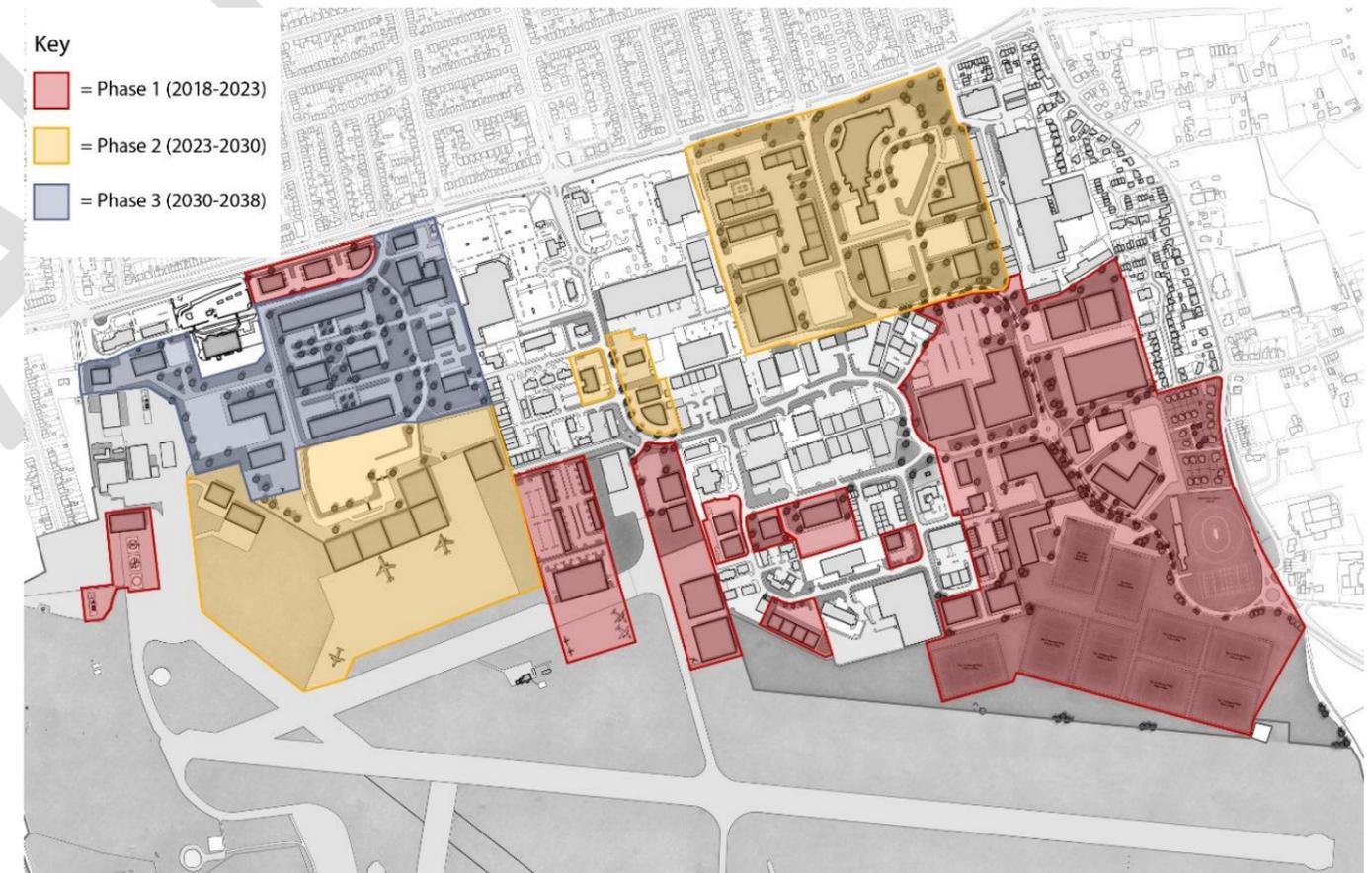
Infrastructure investment, funded by retained business rates, will be front-loaded towards the beginning of the programme in order to support the development of the site by unlocking parcels of land which are currently undevelopable or inaccessible, and to demonstrate to potential tenants or developers that the Enterprise Zone is a high quality strategic and suitable location for investment.

The first phase of the Masterplan, up to 2023, will see the south-eastern part of the site delivered, spear-headed by a new roundabout and the first part of the new spine road. This will open up access of the Industrial Heartland of the Enterprise Zone and create a gateway into the Third Space (leisure and recreation), and connect from here through to the Business Hub – see Chapter 7 for details on character areas. Some changes will also occur at the north-western part of the site, and over time development will work its way inwards from these two corners to all parts of the Enterprise Zone site. Up to 25 individual parcels of land could be brought forward during Phase 1, in the south-eastern and north-western parts of the Enterprise Zone.

**Table 1: Potential plot sizes and floor space (sqm)**

Phase	Plot sizes	Floorspace
1	2,100 – 40,300	800 – 21,600
2	3,800 – 43,700	2,500 – 22,700
3	2,000 – 10,000	1,500 – 9.600

Source: BE Group



## 9 Next Steps

Following the finalisation of the Masterplan, with delivery phases, infrastructure requirements and costings drawn up, this section outlines the next steps which should be undertaken to progress the delivery of the Masterplan.

### Detailed Airport Masterplan

The airport area, at the western end of the site, has only been drawn to a highly indicative level in the Masterplan. A more detailed masterplan and business plan for the airport specifically should be developed, which address the requirements for the regeneration and development of the airport. Now that Blackpool Council own the airport, there is greater scope for managing the growth and expansion of the airport.

### Detailed building conditions surveys

An initial review of the condition of the former Wellington Bomber Factory has been carried out as part of the baseline study of the Blackpool Airport Enterprise Zone site. In addition, there are other buildings on the Enterprise Zone site which have not been reviewed to establish their condition. More detailed examinations of the buildings should be undertaken, to identify any which are no longer fit for purpose, or require significant improvements.

### Planning permission applications

Highways network interventions, such as the new roundabout and spine route on the eastern side of the Enterprise Zone, and the new and remodelled junctions on Squires Gate Lane, will require planning permission to be granted. These highways interventions are necessary for the delivery of other elements of the Masterplan, by making parcels of land accessible and therefore developable.

### Engagement with Lancashire County Council

The new link road from Junction 4 of the M55 towards Lytham St Annes will significantly improve access to the eastern part of the Enterprise Zone, and relieve pressure on the A5230 / Squires Gate Lane. Whilst the link road is not directly a part of the Masterplan, it is still important that Blackpool, Fylde and Wyre Economic Development Company proactively and positively engage with Lancashire County Council, who are the scheme sponsors, to ensure highways interventions at Blackpool Airport Enterprise Zone align with and complement the M55 link road. The M55 link road is progressing at speed and construction could begin as early as 2018 and be ready for opening in late 2019/early 2020.

### Five-year review

Whilst the Masterplan has been developed at one point in time, the Enterprise Zone status at Blackpool Airport is valid for 25 years, to 2041. Inevitably the site will evolve over this period, and so the Masterplan should be reviewed and updated every five years, to ensure it remains a useful framework for developing the site.



# Appendix 2

Report on the Examination into the Blackpool Local Plan, November 2015



The Planning Inspectorate

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# Report to Blackpool Council

by **Malcolm Rivett BA (Hons) MSc MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 23 November 2015

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO  
BLACKPOOL LOCAL PLAN PART 1: CORE STRATEGY**

Document submitted for Examination on 18 December 2014

Examination hearings held between 11 and 14 May 2015

File Ref: PINS/J2373/429/4

## Abbreviations Used in this Report

AA	Appropriate Assessment
CS	Core Strategy
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
OAN	Objectively-Assessed Need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SADMPD	Site Allocations and Development Management Policies document
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document

## Non-Technical Summary

This report concludes that the Blackpool Local Plan Part 1: Core Strategy provides an appropriate basis for the planning of the Borough providing a number of modifications are made to the plan. Blackpool Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council and I have recommended their inclusion, subject to minor alteration, after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Amendments to provide greater clarity about (i) the housing requirement figure, (ii) the way in which proposals for housing will be considered in the period until the Site Allocations and Development Management Policies document is adopted and (iii) ongoing work to ensure that housing needs are met across the Fylde Coast housing market area;
- Clarification that (i) the 30% affordable housing requirement is not a minimum and (ii) bedroom number requirements are subject to viability considerations, and modifications to align policies with national policy in the light of the Housing Standards Review;
- Inclusion of the requirement that development at the Leisure Quarter should not undermine existing resort core uses and attractions.
- Various amendments to ensure clarity and that the plan is internally consistent and aligns with national policy in particular in relation to natural and historic heritage matters, alternative uses of employment sites, town centre uses in the resort core, wind turbines, development at Marton Moss, car parking and surface and waste water.

## Introduction

1. This report contains my assessment of the Blackpool Local Plan Part 1: Core Strategy in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a local plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my Examination is the Blackpool Local Plan Part 1: Core Strategy – Proposed Submission document of June 2014.
3. My report deals with the main modifications that are needed to make the plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any modifications needed to rectify matters that make the plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that are necessary for soundness and/or legal compliance all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications. The consultants who had carried out sustainability appraisal of the plan at various stages of its preparation then considered each modification but concluded that, in the light of them, no further detailed sustainability appraisal would be necessary. Given the nature and likely implications of the modifications I agree with this assessment. The schedule of main modifications has been subject to public consultation. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

## Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the plan's preparation.
6. The Council prepared the plan in collaboration with a wide range of organisations in relation to matters of strategic and cross boundary importance as detailed in the *Statement of Compliance with the Duty to Co-operate*. These matters include homes and jobs; retail, leisure and other commercial development; infrastructure; health, security, community and

cultural infrastructure and climate change and the natural and historic environment. The collaboration also notably involved the preparation of joint evidence bases in connection with a number of key issues including a *Strategic Housing Market Assessment (SMHA)*, a *Gypsy and Travellers and Travelling Showpeople Accommodation Assessment* and a *Retail Study* for the Fylde Coast area in conjunction with Fylde and Wyre Borough Councils.

7. The ongoing co-operation between Blackpool Council and its neighbours Fylde and Wyre Boroughs and Lancashire County Council is formalised in an August 2013 *Memorandum of Understanding* (and March 2015 update) between these authorities. The memorandum indicates how the authorities will continue to work together on strategic issues and details the governance arrangements. As a result of the joint working Fylde Borough has formally agreed to seek to accommodate around 14ha of land for employment purposes, which is identified as necessary to meet Blackpool's requirements but which cannot be accommodated in the Borough.
8. In the light of the February 2014 SHMA, which sets out a range for the objectively-assessed need for new housing in Fylde, Wyre and Blackpool, each authority has indicated through discussions that it considers that it is likely to be able to accommodate its need within its own boundaries. Concern has been raised that the housing requirement for Blackpool set out in the plan and those indicated in the Preferred Options reports for Fylde (2013) and Wyre (2012) are, together, less than the lowest indicated figure in the SHMA for housing need across the Fylde Coast. However, the Fylde and Wyre Preferred Option reports pre-date the February 2014 SHMA and Blackpool Council has stated that the neighbouring authorities have indicated that the housing requirement in their emerging Local Plans will reflect the SHMA. Consequently, notwithstanding the Preferred Options housing figures set out some years ago, there is no reason to believe that the objectively assessed need for housing across the Fylde Coast will not be provided for.
9. Nonetheless, given the importance of meeting housing needs across the Fylde Coast housing market area it is necessary for the plan's effectiveness for it to be clear that the Council will continue to work with neighbouring authorities to ensure that the overall housing needs of the housing market area are met. Modification **MMO4** is thus necessary to soundness, although this in no way undermines the extent or effectiveness of the Council's co-operation with others in preparing the plan.
10. In the light of the above I am satisfied that in preparing the plan the Council has undertaken ongoing, constructive and active engagement with other bodies as appropriate on matters of strategic and cross-boundary significance. The Council has therefore complied with the Duty to Co-operate.

## Assessment of Soundness

### Main Issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the Plan depends.

### **Issue 1 – Is the plan, which takes the form of a Core Strategy to be supported by a yet to be prepared Site Allocations and Development Management Policies document and with a time frame of 2012– 2027, soundly based?**

12. The Framework (paragraph 153) promotes the production by a local planning authority of a single local plan document, with additional development plan documents being produced only “where clearly justified”. In contrast, this plan, preparation of which commenced before the publication of the Framework, takes the form of a Core Strategy to be supported by a separate Site Allocations and Development Management Policies document (SADMPD) which the *Local Development Scheme* anticipates will be adopted in June 2018.
13. Having regard to the Framework and the representations made on the plan, it is highly desirable for there to be adopted policies in place in Blackpool for strategic planning matters, site allocations and development management as soon as possible. It appears to me that adoption of the Local Plan Part 1 Core Strategy followed by preparation and Examination of the SADMPD to the broad timescale set out in the *Local Development Scheme* is likely to result in “full plan” coverage for the Borough more quickly than if the current Core Strategy were to be aborted and work were to then commence on the production of a single local plan document.
14. Whilst it is not ideal that the Core Strategy will not offer the certainty about individual housing sites which the SADMPD will eventually provide, there is no reason why housing developments which accord with the policies in the Core Strategy, and the saved ones of the 2006 Local Plan, should not come forward in advance of the adoption of the SADMPD, a matter discussed elsewhere in this report in more detail. Consequently, in these particular circumstances and at the present time, the principle of the plan taking the form of a Core Strategy is clearly justified and soundly based.
15. The plan has a 15 year time frame of 2012 – 2027 which means that it would have a post-adoption life of less than 15 years. Paragraph 157 of the Framework indicates that plans should preferably have a 15 year time horizon. However, this period is not a requirement of national policy and nor does the Framework indicate that the 15 year time horizon must be post-adoption. Whilst some of the plan's evidence base extends to 2030, other elements of it do not and it is highly likely that modifying the plan to extend its life would further delay its adoption (and potentially that of the SADMPD). Bearing in mind the emphasis in the Framework (paragraph 12) on getting up-to-date plans in place, I conclude that the benefits of getting the Core Strategy adopted as soon as possible outweigh the disadvantages of it not providing guidance for development in Blackpool for a three year period (2027-2030)

twelve years from now. Consequently, in these circumstances, the plan period is also soundly based.

**Issue 2 –Does the plan set out a strategy for the strategic location of development and for housing, health and education which is positively prepared, justified, effective and consistent with national policy?**

*Strategic Location of Development*

16. Policy CS1 identifies that the overarching spatial focus for Blackpool is regeneration, focussed on Blackpool Town Centre, the Resort Core and neighbourhoods within inner areas, and supporting growth, to help meet housing and employment needs, in South Blackpool. In the light of all the evidence, particularly that concerning the Borough's key challenges and opportunities, the twin focus on regeneration and supporting growth is soundly based and it is not necessary for policy CS1 to address in detail every part of the Borough and/or every development likely to take place during the plan period.
17. Concerns that the policy (and the plan more generally) do not adequately address the need to positively encourage new housing development, and in particular "aspirational" homes, in the period until the SADMPD is adopted are considered below under the *Housing Target and Trajectory*.

*Objectively-Assessed Need for Housing*

18. The *Fylde Coast Strategic Housing Market Assessment (SHMA)* of February 2014, was prepared jointly for Blackpool, Fylde and Wyre Councils. Based on analysis of commuting and migration patterns the assessment identified the boundaries of the three authorities together as forming a relatively highly contained housing market area and there is no substantive evidence to challenge this. However, the assessment recognised that more local markets also operate within the Fylde Coast, equating more closely, although not necessarily precisely, to the boundaries of each Borough. Given this, and that local plans are being prepared for each Borough, the SHMA sets out housing requirement figures for both the Fylde Coast as a whole and individually for Blackpool, Fylde and Wyre.
19. In line with the *Planning Practice Guidance (PPG)*, the SHMA's starting point for the assessment of housing need was sub-national population and household projections. At the time of its preparation the 2011 projections were the most recently published although, given their interim basis, the assessment used the 2010 based projections, re-based to account for the 2011 Census population data. Using the POPGROUP software model the SHMA considered six future scenarios relating to different levels of migration, economic prospects and the ability/propensity of households to form. Based on what it reasoned to be the most realistic scenarios the SHMA concluded that the objectively-assessed need for new housing for Blackpool lies between 250 and 400 dwellings per annum between 2011 and 2030.
20. Since the submission of the plan for Examination the 2012-based Department for Communities and Local Government (DCLG) household projections have been published and the Council commissioned evidence (Doc FEB 002, April 2015) to, in effect, update the SHMA's findings to take account of the most

recent projections. These are considered across six scenarios:

- The “benchmark” of the 2012-based Sub-National Population Projections (SNPP);
  - Future migration based on the historic, 2003-2013, trend including “unattributable population change” in international migration assumptions;
  - Future migration based on the historic, 2003-2013, trend excluding “unattributable population change”;
  - Population growth determined by the change in the number of jobs as defined by Experian 2013 employment forecasts;
  - Population growth determined by the change in the number of jobs as defined by Oxford Economics employment forecasts; and
  - Population growth determined by the change in the number of jobs as defined by Oxford Economics employment forecasts, also assuming that the unemployment rate decreases in the 2013-2018 period.
21. The annual dwelling requirement for Blackpool for the 2012-2027 plan period ranges from 146 for the 2012- based SNPP “benchmark” scenario to 410 for the Experian 2013 employment forecasts scenario.
22. In the light of the SHMA the plan sets an objectively assessed need for housing (and housing requirement figure) of 280 dwellings per annum (dpa) influenced primarily by the Oxford Economics employment forecasts scenario. In view of this the key issues for consideration are whether or not this figure for the objectively-assessed need for housing is soundly based having regard to the most up to date evidence, and in particular:
- the competing Experian employment forecasts;
  - the headship rate assumed in the 2012-based household projections and whether or not household formation rates have in the past been suppressed;
  - market signals; and
  - the identified affordable housing requirement of 272 dwellings per year.
23. Both Experian and Oxford Economics forecast that Blackpool will perform significantly better in terms of employment during the plan period than it did in the period 2002 – 2012. Against a decline in employment of around 10% during this period Oxford Economics forecasts a much smaller decline of 1.4% during the 15 year plan period and Experian an increase of 1.2%. Although Oxford Economics forecast a small decline in employment, in the light of the significantly more negative employment trend of the ten years to 2012, which covers periods of both economic growth and recession across the country as a whole, it appears to me that both forecasts are appropriately aspirational.
24. Doc EB 006 analyses the realism of both forecasts by employment sector. Oxford Economics forecasts a decline in employment in public administration and defence along with a growth in arts, entertainment and wholesale and

retail. In contrast Experian forecasts a growth in public sector employment and a decline in retail. In the light of government policies to rebalance the economy away from the public sector and the Council's aspirations (supported by policies in the plan considered elsewhere (Issue 4)) to recapture for Blackpool retail trade currently lost to other areas, I concur with the findings of the report, and the view of the Council, that the Oxford Economics forecasts are more consistent with national and local policy expectations.

25. Reference is made to the proposed Enterprise Zone for Blackpool and to the Local Enterprise Partnership's (LEP's) ambitions to create 50,000 new jobs across Lancashire. However, in terms of the LEP's ambitions I have not seen evidence of firm plans, timescales and likely jobs numbers for Blackpool specifically. Moreover, whilst the Lancashire Growth Deal specifically refers to a commitment to deliver 1658 new homes in the Blackburn – Bolton railway line and M65 corridors, it makes no specific reference to an overall housing figure for Blackpool and there is nothing to suggest that the Core Strategy's 280dpa housing requirement figure would not align with the Growth Deal's commitments to "address the housing market in Blackpool" in order to support the renewal and growth of the Borough. Furthermore, it is not the case that the Experian forecasts take account of the possible Enterprise Zone and LEP's aspirations and that the Oxford Economics forecasts do not.
26. All in all I conclude that the Oxford Economics forecasts are the most appropriate basis on which to consider housing requirements. And, although these forecast a decline in employment over the plan period (albeit at a much lower rate than in the past), it is notable that, nonetheless, there would need to be significant levels of in-migration in to Blackpool to provide the employees needed to fill the jobs. This is primarily explained by the forecast ageing of the Borough's existing population and consequent reduction in the number of economically active residents.
27. Based on the Oxford Economic Scenario the SHMA forecasted a requirement of 281 dpa for the 2012-2027 plan period. This figure assumed that the headship rate was the average of those indicated in the 2008-based and 2011-based household projections. The comparable figure on the 2012-based household forecasts is 324 dpa, the difference primarily resulting from the higher headship (household formation) rate assumed in the 2012-based projections. In principle it makes sense to base housing requirements on the most up to date evidence on household formation rates.
28. However, the Doc FEB 002 "update" of the SHMA also analyses the impact of reducing unemployment in the Borough. The 324 dpa figure assumes that the average recession period (2008-13) unemployment rate for Blackpool of 8.2% would continue throughout the plan period to 2027. Based on the alternative assumption that the unemployment rate will fall incrementally to the pre-recession (2004-2007) average of 6% in the period to 2018, and then remain unchanged for the rest of the plan period, the comparable housing requirement figure is 223 dpa. It appears to me to be both highly likely and desirable that some of the new jobs created in Blackpool during the plan period (as forecast by Oxford Economics) would be taken by currently unemployed residents of the Borough rather than entirely by people moving into the town.

29. In line with the DCLG's *Planning Practice Guidance* (PPG) consideration has also been given to whether or not past household formation rates, reflected in the household projections, were suppressed by a lack of available housing. The SHMA identifies that between 2001 and 2011 an average of 43 new households a year were formed in Blackpool whilst, on average, 255 net new dwellings were delivered in the same period. Moreover, the dwelling vacancy rate increased from 5% in 2001 to 7.2% in 2011. The Council contends that this indicates that household formation rates have not been constrained by a lack of available housing in the Borough. However, the Council notes that the vacant properties are concentrated in inner areas and are likely to be private-rented, older accommodation in poor condition.
30. Consequently, it may well be the case that potential (or "concealed") households, in the market for owner-occupied housing in outer areas, were constrained from forming by a lack of available accommodation of this type. Indeed, the proportion of all families which are "concealed" in Blackpool, at 1.86%, is higher than the North West average (1.62%) and about the same as for England as a whole (1.85%). Moreover, the proportion of overcrowded households in Blackpool (3.3%), although below the England average, is significantly higher than the figure for Fylde Coast (2.5%). In the light of the PPG guidance this would imply a higher objectively-assessed need (OAN) than the 223 dpa figure referred to above.
31. Consideration of market signals has been formalised by the Council in its May 2015 *Blackpool Market Signals Report*. This shows that median house prices in the Borough fell significantly between 2007 and 2012 and that they are currently only 77% of their 2005 value, in comparison with 91% in Lancashire as a whole and 112% in England and Wales. Moreover, in the year to March 2015 Blackpool had the second lowest increase in house prices of the 64 largest urban areas in the UK. The report also demonstrates that rents in Blackpool are significantly below the England average, at or slightly below the North West average and were unchanged in cost between 2012/13 and 2013/14 in comparison with an England-wide increase of 3.33% (lower quartile) and 1.71% (median). In terms of affordability the ratio of lower quartile house price to earnings has fallen from a high point of around 6.75 in 2007 to approximately 4.6 in 2013. This latter figure compares with around 5.0 for Lancashire as a whole and approximately 6.5 for England. I concur with the Council that this evidence, together with the other analysis set out in the *Blackpool Market Signals Report*, does not demonstrate a need to adjust the objectively-assessed need for housing to reflect market signals.
32. Following the definitions and method of calculation set out in the PPG, the SHMA (November 2014 Addendum) identifies a net affordable housing need of 272 dwellings a year, comprising a backlog of approximately 170 dpa and new need of around 100 dpa. Based on the Council's proposed target of 30% of new dwellings to be affordable this would require a minimum of around 900 new dwellings a year to be delivered in total to achieve the required number of affordable homes. In reality, bearing in mind that on viability grounds plan policy CS14 excludes inner area housing developments from the 30% requirement, to deliver 272 affordable homes a year would require more than 900 dwellings in total to be constructed each year. The Council considers this to be completely unrealistic, bearing in mind that in the last 25 years or so the highest ever number of dwellings constructed in a year was 484 in 1997/98.

Nobody has contended otherwise.

33. I have carefully considered the argument that the OAN should be set at a level which would at least enable the forecast new affordable housing need (around 100 dpa) to be provided for. Whilst this would imply an OAN of at least 300 dpa it is not possible to determine exactly what the figure would need to be as it would depend on the balance of housing delivery in inner areas, where affordable housing will not be required, and outer areas where it will be and also the Council's success in achieving at or near 30% of outer area dwellings as affordable accommodation in the light of the "subject to viability" clause of plan policy CS14. Indeed, it appears to me that the delivery of affordable housing will as much, if not more, depend on the success of this policy as on the total number of houses delivered. Moreover, noting the PPG's advice that an increase in the supply of housing can reduce land prices, and in the context of Blackpool's fragile housing market, there is the potential for a supply of housing land in excess of that required to meet demographic and economic needs resulting in land and house values which in many cases would not support 30% affordable housing delivery. In the light of this there is no convincing evidence to justify increasing OAN to reflect identified affordable housing needs.
34. It is the case that the private rented sector currently plays a significant role in Blackpool in providing homes for those in need of affordable housing. Indeed, it is stated that the majority of in-migration into the Borough in many years in the 2000s was by housing benefit claimants from other areas of the region and country, specifically attracted to Blackpool by the availability of relatively low cost private rented accommodation, much of it converted from hotels and guest houses. Whilst it may not fully meet their needs in reality this accommodation will continue to provide homes for these people and, through plan policy CS12, the Council is seeking to achieve neighbourhood regeneration to improve the quality of the private rented housing stock.
35. In summary the Council contends that the objectively-assessed need for housing in Blackpool is 280 dpa [paragraph 22 above], which is more than 90% higher than the "starting point" figure of 146 dpa implied by the most recent (2012-based) SNPP and SNHP [paragraph 21 above]. However, in determining the requirement for new housing, it makes sense to give significant weight to future economic forecasts and I concur with the Council that the Oxford Economics employment forecast is appropriately aspirational and is more realistic than the competing one [paragraph 24 above]. Aligned with the increased labour requirement resulting from this forecast it is also eminently sensible to plan on the basis that unemployment will gradually fall to the pre-recession average for Blackpool rather than remain at a recessionary period high of 8.2% for the plan period [paragraph 28 above]. Taking account of this would imply an objectively-assessed need of 223 dpa [paragraph 28 above].
36. Whilst market signals do not imply the need to adjust this figure it is notable that the proportion of concealed households in the Borough is above the regional average and is very slightly higher than the national figure. Moreover, notwithstanding the increase in the proportion of vacant properties in recent years, concern has been expressed about a lack of owner-occupied dwellings in outer areas constraining the formation of some households and there is

some evidence of a problem of overcrowded households in Blackpool. Whilst there is not the evidence to determine precisely how the OAN should be adjusted to reflect this, the Council's figure of 280 is some 25% higher than the implied objectively-assessed need figure of 223 dpa, referred to above. I am satisfied that this is a proportionate increase to reflect any suppression of household formation rates and overcrowding. There is no convincing evidence to justify further increasing the figure in order to meet identified affordable housing needs.

37. In conclusion, therefore, 280dpa (4,200 dwellings across the plan period) is a soundly based figure for the objectively-assessed need for housing in Blackpool.

#### *Housing Target and Trajectory*

38. In the light of the objectively-assessed need of 280 dpa, policy CS2 states that provision will be made for 4200 new homes in Blackpool during the plan period – ie it is intended that the housing requirement figure will deliver the full, objectively-assessed need for housing.
39. Between 1991 and 2013 an average of 267 dpa were delivered in the Borough and in the context of this it has been suggested that a 280dpa target would not represent a positively prepared plan nor be the significant boost in the supply of housing which the Framework indicates is needed. However, paragraph 47, states "to boost significantly the supply of housing local planning authorities should... ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing". The plan seeks to meet the OAN for Blackpool and thus accords with the Framework in this respect.<sup>1</sup> The Framework does not indicate that boosting housing supply necessarily requires an increase in housing delivery in every local authority area in the country and, in any case, 280dpa would represent an around 60% increase on the average new dwelling construction of 176 dpa in the period 2008/09 – 2012/13. Although the target would be less than set for Blackpool in the Regional Spatial Strategy for the North West, that document has been revoked, its evidence base pre-dated that prepared for this plan and I understand that it was based on policy objectives and circumstances which are no longer relevant.
40. Concern is expressed that the 280 dpa requirement is towards the bottom of the 250 – 400 dpa objectively-assessed need range indicated in the 2014 SHMA. However, the comparable range indicated in the Doc FEB 002 SHMA update (reflecting the 2012-based household forecasts) is 146 – 410 dpa. The 280 dpa requirement is slightly above the mid-point of this range.
41. With regard to paragraph 5.7 of the plan concern is raised that the Council is actively seeking to stem the trend of in-migration to Blackpool of housing benefit claimants. As discussed at the hearings this is not the case. Whilst the creation of more balanced communities in the Borough, particularly in the inner areas, is a priority, in reality the Council could do little to prevent in-migration of housing benefit claimants if the housing which has traditionally

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<sup>1</sup> As detailed in paragraph 32 whatever the total housing requirement figure for Blackpool it is not realistic to deliver the full affordable housing requirement in line with the Framework's definition of such accommodation.

attracted such migrants continues to be available. However, the housing requirement figure is based on the assumption of greater in-migration of workers than in the past and, thus, the proportion of in-migrants claiming housing benefit is likely to fall. Whilst not a matter that goes to soundness the Council has proposed an "additional" modification to para 5.7 to address any misunderstanding in connection with this matter.

42. Policy CS2 indicates that the required new homes will be located on sites identified through policy CS25 at South Blackpool, other sites in the existing built-up area, to be identified, and windfall sites. The Council's *Strategic Housing Land Availability Assessment* (SHLAA) (published June 2014) identifies that there are suitable and deliverable sites to accommodate 3,979 new dwellings and that a further 1400 new dwellings are forecast to be delivered on windfall sites. In addition 128 dwellings were completed in 2012/13, the first year of the plan period. The majority of windfall site developments are anticipated to be conversions (notably of hotels and guest houses) in the inner areas and the Council is encouraging such schemes in appropriate circumstances as part its regeneration strategy. Given this, the availability of such premises in Blackpool and the evidence of windfall housing development at around 100 dpa in recent years, there is compelling evidence that windfalls will continue to provide a reliable source of housing land supply during the plan period. I have seen nothing to suggest that the SHLAA's assessment of land supply is unrealistic or that, two specific sites aside considered in Issues 3 and 5, it excludes sites which would be suitable for housing.
43. Together the SHLAA sites, windfall sites and existing plan period completions would provide land for a total of 5379 dwellings, around 30% more than the 4200 plan period requirement. Paragraph 5.13 of the plan notes that, given Blackpool's difficult housing market and the risks in delivering more challenging sites, this "buffer" will provide flexibility should some sites not come forward as anticipated.
44. This buffer is clearly likely to be important in ensuring that the housing requirement in Blackpool is delivered. However, whilst it emerged in evidence submitted during the Examination that the majority of housing will be on sites to be identified in the forthcoming Site Allocations (SADMPD) document, this is not entirely clear from policy CS2 or its supporting text. Nor is it clear how the buffer will feature in the SADMPD or, until this document is adopted, on what basis housing developments will be encouraged/determined. To ensure that the plan is effective, and to provide appropriate clarity for developers, **MM02**, **MM03** and **MM05** are therefore necessary. I have slightly amended the wording of MM03, in the light of consultation responses, to make clear that a buffer of sites allocated in the SADMPD is "likely to be necessary".
45. However, given that circumstances can change and that it cannot be absolutely guaranteed that there will be sufficient suitable and deliverable housing sites to provide such a buffer in the SADMPD, it is not appropriate to state that a buffer "will" be provided. Furthermore, in the light of these modifications, the suggested addition to policy CS2/its supporting text, concerning support for SHLAA sites which fulfil the other policy requirements of the plan, is not necessary to soundness and, indeed, could inappropriately imply that, in advance of the adoption of the SADMPD, only sites identified in

the SHLAA would be permitted.

46. Policy CS2 states that provision will be made for "around" 4200 new homes. This lacks clarity and could result in less than the objectively-assessed need for housing being delivered. **MMO1**, which deletes the word "around", is therefore needed in the interests of effectiveness and the plan's soundness. In the light of consultation responses and to further ensure clarity (in the context of anticipated demolition of housing taking place in Blackpool) MMO1 includes "net" after the 4,200 figure. However, notwithstanding that such wording is used in a number of adopted plans, it is not necessary for the policy to state that provision will be made for "at least" 4200 homes. As already mentioned the Framework is clear that to be positively prepared and to boost significantly the supply of housing local plans should meet the full objectively-assessed needs for housing and policy CS2 (as proposed to be modified) would do that. There is nothing in national policy which indicates that, against their wishes, authorities should provide for more housing than is needed. That said, the 4200 dwellings figure is not a "ceiling" and the plan would not prevent more than 4200 dwellings coming forward if, in the light of the plan's policies (and other saved policies), this is shown to be sustainable.
47. Representations suggest that the plan gives insufficient emphasis to the need for "aspirational" homes, particularly for families, at the expense of inner area regeneration. However, this is not the case: paragraph 2.37 identifies a limited choice of family housing as an overarching issue and a number of the plan's 21 objectives relate to the provision of a choice of quality homes. More than 60% of the SHLAA sites identified in the five year supply of housing land (see below) are located in the Borough's outer, as opposed to inner, areas and policy CS13 sets bedroom number requirements to rebalance the housing stock to offer more family homes.
48. Paragraphs 5.19 – 5.21 of the plan indicate that within the overall average housing requirement of 280 dpa, the target will be 250 dpa in 2012-2017, 280 dpa in 2017-2022 and 310 dpa in 2022-2027. Whilst concern has been raised at this, there is nothing in national policy to indicate that such a phased approach to housing delivery is inappropriate. Indeed, paragraph 47 of the Framework requires local authority to illustrate the expected rate of housing delivery through a housing trajectory. There would be little point in this requirement if authorities were obliged to seek to deliver housing at a consistent rate throughout the plan period.
49. Two factors justify the phased approach to housing delivery in Blackpool. The housing requirement is substantially higher than the 2012-based household forecast "starting point" primarily reflecting Oxford Economics' employment projection. However paragraph 4.5.1 of Doc EB 006 demonstrates that, within the context of an overall average plan period housing requirement of around 280 dpa the economic forecasts result in a much lower requirement (72dpa) for the first five years, with consequentially higher requirements in later years. Given that delivery has significantly exceeded 72dpa in recent years there would be little point in "artificially" reducing it to this arguably extreme low level to precisely match the economic forecasts. However, the evidence does indicate that there is not the need for housing provision in the early years of the plan period to be as high as in the later years. Moreover, the plan's phasing of housing delivery provides for housing being delivered ahead of the

requirements indicated in Doc EB 006 throughout the plan period.

50. Secondly, given that in the last three years (ie 2012/13 – 2014/15, the first three years of the plan period) delivery averaged 109 dpa, it is unrealistic to expect that 280 dpa will be completed in the next two years. Notwithstanding the desirability of delivering more housing as quickly as possible, it is in nobody's interests to set a short term target which almost certainly would not be met. Consequently, the phased approach to housing delivery set out in the plan is soundly based.

#### *Five Year Supply of Deliverable Housing Land*

51. Doc EL1.004 sets out the position concerning the five year supply of housing land as of 1 April 2015 (updating figures in other evidence, notably Doc EB 003, *Blackpool's Housing Requirement: Technical Paper*). This indicates that there are sites which could deliver 2063 dwellings in the five years to March 2020, 1221 of which have full or outline planning permission. Concern is expressed at the reliance on sites yet to secure planning permission and the potential for not all those sites with planning permission to come forward. However, there is no detailed evidence to contradict the site by site analysis provided by the Council in support of its supply figure. Moreover, the figure represents the total number of dwellings which are capable of coming forward in the next five years (ie the deliverable supply) and it is not necessarily the case that they will all come forward.
52. Accounting for the shortfall in delivery in the first three years of the plan period and applying a 20% buffer to reflect persistent under-delivery in the past, the analysis demonstrates that there is currently a 5.7 years supply of deliverable housing land. This assumes that the shortfall in supply in the first three years is made up throughout the rest of the plan period rather than in the next five years. Whilst concern has been raised at this, and it is pointed out that the PPG advises that local authorities should aim to deal with any undersupply in the first five years of plan period where possible, there is nothing in national policy to indicate that this is an absolute requirement. Moreover, as indicated above, the Oxford Economics economic forecasts, on which the housing requirement figure is primarily based, implies a housing requirement of 72 dpa in the early years of the plan period – a much lower figure than the 280 dpa plan period average housing requirement. This reinforces the appropriateness of "catching up" in full on early years' delivery below the 250 dpa target (above the 72dpa figure) over a longer period than the next five years.
53. Representations suggest that the Council should seek to implement more positive actions through the plan and bring forward viable sites to ensure that a five year supply can be achieved. However, the Mythop Road and Co-op Sports Club and Field sites aside, there are no suggestions of any specific sites, beyond those already included in the five year supply analysis, which could deliver housing in Blackpool or, having regard to the Duty to Cooperate, in neighbouring districts for the Borough, in the next five years. As detailed in Issue 3 the plan appropriately provides for housing coming forward at Mythop Road as enabling development for an employment scheme. Moreover, bearing in mind the likely modest scale of possible housing development on the Co-op Sports Club and Fields site, as discussed in Issue 5, there is no compelling

reason why the Core Strategy should specifically seek to bring forward this site for housing.

*Affordable housing, meeting the housing needs of gypsies and travellers and housing standards*

54. Policy CS14 sets out the requirement that, other than in the defined inner areas, housing developments will be required to provide 30% affordable housing on sites of 15 dwellings or more. On sites of less than 15 dwellings a contribution will be sought to off-site provision in line with the *Affordable Housing Supplementary Planning Document*. The policy also indicates that where the requirements are robustly demonstrated to render a development unviable an alternative level of provision may be negotiated.
55. The 30% affordable housing requirement reflects the findings of the *Blackpool Local Plan and CIL Viability Study Report*, which demonstrates that most inner area housing schemes are unlikely to be able to viably provide for affordable housing. In contrast, it shows that around two-thirds of the assessed outer area housing schemes could viably provide affordable housing at or very near the 30% level and that the majority of the other third could viably make some affordable housing contribution. In the light of this the policy's requirement for only outer area housing schemes to contribute towards affordable housing at a 30% rate, subject to negotiation where specific viability constraints exist, is justified and soundly based.
56. However, it is not appropriate for the policy to refer to 30% as a "minimum" requirement (and at the hearings the Council indicated that this had not been the intention of the policy) and thus **MM17** which removes this word is necessary for the policy to be justified. In the interests of clarity, and thus effectiveness, **MM18** updates the policy's supporting text in relation to the affordable housing requirement. A reference to Vacant Building Credits, a detailed aspect of the application of affordable housing requirements, is not necessary to the soundness of the plan.
57. Policy CS12 is a positively prepared policy seeking to create more sustainable communities within the Borough particularly within the inner areas and outer estate priority neighbourhoods. However **MM13**, slightly reworded from that consulted upon in the light of comments by Historic England, is necessary for the policy to be effective and accord with national policy.
58. Policies CS10 and CS13 concern, amongst other things, standards for new housing and **MM12**, **MM15** and **MM16** are necessary to ensure that the policies, and supporting text, are consistent with the recent changes to government policy in this respect. MM16 has been revised in the light of consultation responses and the Council's acceptance that there is not currently the evidence to justify space standards for new-build housing. However, in terms of conversion of existing buildings the Council's *New Homes from Old Places Supplementary Planning Document (SPD)* provides the evidence to justify space standards for residential conversions and the viability assessment of the Core Strategy (see Issue 9) indicates that these would not threaten scheme viability. Whilst the SPD sets more stringent requirements than the nationally prescribed Technical Housing Standards Space Standards, MM16 (as amended) explains the Council's intention to appropriately replace the SPD's

space standards with those of the nationally prescribed standards.

59. In line with paragraph 50 of the Framework policy CS13 also sets out requirements concerning dwelling sizes, in terms of the number of bedrooms, in order to help achieved balanced and mixed communities. However, to be effective, the policy needs to be more flexible and to reflect viability constraints, akin to policy CS14 concerning affordable housing. **MM14** is thus necessary to the soundness of the plan.
60. The Council jointly commissioned an updated assessment of needs for sites for gypsies, travellers and travelling showpeople with Fylde and Wyre Boroughs. The relevant report was published following the finalisation of the Submission Plan and thus policy CS16 indicates that a target for new permanent and transit pitches and plots will be set in the Local Plan Part 2: Site Allocations and Development Management document. Consistent with national policy (*Planning policy for traveller sites, March 2012*) CS16 sets out criteria against which allocations for plots and pitches, and any applications which may come forward in the meantime, will be assessed. The updated assessment is now complete and the Council, jointly with the neighbouring authorities, is currently undertaking a "Call for Sites" exercise. The Council contends that it is not appropriate to set a target for plots and pitches until this exercise is complete, bearing in mind the requirements of the Duty to Co-operate if one or more of the authorities are unable to accommodate the identified needs. In the absence of any arguments to the contrary this is a soundly based approach.

#### *Health and Education*

61. Policy CS15 supports development which encourages healthy lifestyles and which enables the provision of high quality education facilities. It also indicates that, where a development will impact on the capacity of existing healthcare and/or education provision, contributions will be sought towards the provision of the necessary capacity. In the light of section 8 (Promoting healthy communities) of the Framework, policy CS15 is positively prepared, justified and effective.
62. In conclusion, subject to the recommended modifications **MM01– MM03**, **MM05** and **MM12 – MM18**, the policies in respect of the strategic location of development and for housing, health and education are positively prepared, justified, effective and consistent with national policy. They thus provide a sound basis for managing development in Blackpool.

#### **Issue 3 – Does the plan set out a strategy for economic development and employment land which is positively prepared, justified, effective and consistent with national policy?**

63. Policy CS3 seeks to strengthen the local economy by safeguarding around 180ha of existing employment land, promoting office development in Blackpool Town Centre and promoting for employment purposes additional land in South Blackpool. The policy reflects the findings of the *2013 Blackpool Employment Land Study* which recommended projecting forward the average historic employment land take-up rate of 1.75ha per year and including a 20% flexibility allowance. This equates to a 31.5ha requirement for additional

employment land during the plan period. Whilst there are a number of alternative possible methods of determining the requirement for employment land there is nothing to suggest that for Blackpool this approach is not positively prepared, justified and otherwise soundly based.

64. It has been argued that an increase in the supply of employment land is inconsistent with the Oxford Economics' forecast of a small decline in employment on which the housing requirement has been primarily based. However, this misunderstands the fact that although in recent years there was a much bigger decline in employment in the Borough than is forecast for the plan period, the take-up of new land for employment purposes nonetheless averaged 1.75ha per year. This is likely to be explained by some businesses not necessarily making the most efficient use of their land and new/expanding businesses having different land/locational requirements to declining old ones.
65. At July 2012 the baseline supply of realistic and available employment land was 17.8ha, indicating a shortfall in supply of 13.7ha. The Council indicates that, due to the intensely developed nature of Blackpool and its tightly constrained boundary, it is not feasible to meet this requirement within the Borough. Through joint working Fylde Borough Council has agreed to provide for around 14ha of employment land to address the shortfall in Blackpool and this is confirmed by that Council in a letter dated 8 December 2014 (DC 001). Whilst Fylde cannot currently indicate precisely where in its Borough this land will be located, at the hearings Blackpool Council stated that the soundness of this plan does not depend on its exact location within Fylde, and there is nothing to indicate otherwise.
66. It has been argued that policy CS3 is inconsistent with paragraphs 22 and 51 of the Framework in that the policy itself does not deal with alternative uses for existing employment sites for which there is no reasonable prospect of their being used for employment. However, in accordance with paragraph 22 of the Framework, the Borough's employment sites have been recently reviewed for their ongoing suitability through the *Blackpool Employment Land Study* and, the NS&I site at Mythop Road aside, there is no suggestion that its findings are incorrect or unrealistic. Moreover, whilst policy CS3 does not repeat national policy in terms of alternative uses for employment sites, neither does it conflict with it, nor does it suggest that national policy should not be applied in the determination of planning applications. However, the policy's supporting text (paragraph 5.35) suggests that acceptable alternative uses on employment sites might be more restricted than national policy indicates and, consequently, **MMO6** is needed to ensure consistency with national policy.
67. Submissions have been made that the NS&I site at Mythop Road has limited potential as an employment site in its entirety and that housing development on part of the site would enable viable redevelopment of the rest of it for modern employment purposes. The Council has indicated that, in principle, such a form of development may be appropriate at this location in line with the supporting text of policy CS3 as it currently stands and as it is proposed to be modified. However, since housing development would be justified on the basis of it enabling redevelopment of the rest of the site for employment purposes, it makes sense to retain the site allocated for employment in its entirety until a development of this type is permitted and constructed.

68. In conclusion, subject to **MM06**, the plan's strategy for economic development and employment land is positively prepared, justified, effective and consistent with national policy.

**Issue 4 – Does the plan set out a strategy for retail and other town centre uses which is positively prepared, justified, effective and consistent with national policy?**

69. Policy CS4 seeks to strengthen the role of Blackpool Town Centre as a sub-regional retail centre through additional comparison goods floorspace (to be identified through the SADMPD) and the preparation of a Town Centre Strategy and Action Plan. In line with guidance in the Framework, the policy promotes town centre uses of an appropriate scale in the Borough's other town, district and local centres and identifies that edge and out of centre retail/town centre development will only be permitted where, amongst other criteria, there are no more sequentially preferable sites.
70. The policy is based on the jointly commissioned (with Fylde and Wyre Boroughs) *2011 Fylde Coast Retail Study*, which, on the assumption of a moderate increase in the retention of trade which would otherwise "leak" outside the Borough, identifies capacity for 16,390 sq m of additional comparison goods floorspace in Blackpool Town Centre. A 2013 update of the study, prepared for Fylde and Wyre Boroughs alone, assumes static retention of trade and thus forecasts lower capacity for additional retail floorspace across the Fylde Coast. However, a moderate increase in the retention of retail trade in Blackpool Town Centre aligns with the plan's overall regeneration, employment and housing strategy and would assist in reducing journey lengths in connection with retail trips. Moreover, there is no convincing evidence that this aspirational strategy is not realistic.
71. Part 3 of policy CS4 indicates that town centre uses will only be permitted outside town, district and local centres subject to strict criteria, consistent with national policy. However, as tourism facilities are main town centre uses this aspect of policy CS4 conflicts with policy CS21's statement that tourism attractions will be focussed in the town centre and identified "Resort Core". As considered in Matter 7 there is a strong case for permitting tourism facilities and ancillary retail development in the Resort Core and therefore **MM07** is necessary to ensure consistency between the two policies and, thus, the effectiveness of the plan.
72. In support of policy CS4, policy CS17 indicates in more detail how the role of Blackpool Town Centre will be strengthened, including adequate references to the "evening economy". However to accord with the Framework, in connection with conserving and enhancing the historic environment, **MM19** is required to replace the policy's "exploiting key heritage... assets" phrase with "conserving and enhancing key heritage...assets".
73. Policy CS18 seeks major refurbishment of the Winter Gardens to enhance its appeal and status as an entertainment, leisure and conference venue. Whilst it is positively prepared **MM20 – MM22** are necessary, in the interests of clarity, justification and consistency with national policy, to make clear that supported uses include theatres, that any retail uses must be a limited element of redevelopment and that proposals must sustain and enhance the significance

of the Grade 2\* Listed Building (this latter point slightly amended in the light of consultation comments by Historic England). Whilst use of the word "limited" in relation to retail uses has been challenged there is the potential for more than limited retail development at the Winter Gardens to threaten its significance as a heritage asset. Moreover, there is no convincing evidence to suggest that without the inclusion of this word in policy CS18, appropriate redevelopment of this building could be ensured. However, it is not of sufficient relevance to planning, nor necessary to soundness, to require that development is financially self-sustaining and that generated income is used to maintain/enhance the Winter Gardens heritage asset.

74. Policy CS19 promotes comprehensive redevelopment of the Talbot Gateway Central Business District as part of the strategy of strengthening the role of the Town Centre and regeneration more generally. It is positively prepared although, given that the referred-to major foodstore has been completed, **MM23**, which corrects the reference to this development, is necessary to clarity and ensuring that the plan is justified.
75. The Town Centre's Leisure Quarter incorporates the prominent, but under-utilised, former Central Station site and the adjoining promenade frontage. Its comprehensive redevelopment is central to the plan's strategy for regeneration and employment. In support of this policy CS20 promotes comprehensive redevelopment of the quarter to provide a major leisure development of national significance and sets out criteria with which such a development must accord.
76. It is argued that if an amusement park were to be developed on this site it could significantly undermine the existing Pleasure Beach amusement park and the resort more widely and that, thus, amusement park development should be prohibited by policy CS20. The uniqueness of the Pleasure Beach and its value to Blackpool's economy and its role as a resort are not in dispute. I also appreciate that, nonetheless, it is an economically vulnerable attraction. However, whilst there is, at this stage, no evidence to indicate that an amusement park development at the Leisure Quarter would not threaten the viability of the Pleasure Beach and the resort more widely, neither is there convincing evidence to indicate that, as a matter of course, it would. Moreover, and having regard to the definition of an "amusement park" in the Town and Country Planning (General Permitted Development) (England) Order 2015, it seems to me that the likely effect on the Pleasure Beach and the resort more widely of an amusement park element of a Leisure Quarter redevelopment scheme would very much depend on the precise scale and nature of the development. It would, thus, be most appropriately considered in detail against policy CS20's criteria as part of the planning application for any specific proposal which might come forward.
77. Policy CS20 and its supporting text does not suggest that an amusement park would be an appropriate use for the Leisure Quarter site and the policy is clear that redevelopment should provide a compelling new reason to visit Blackpool and should integrate with and support existing resort core uses/attractions. As discussed at the hearings, to be justified it is also necessary for the policy to state that redevelopment should not undermine existing resort core uses and attractions (**MM24**). However, in the light of the policy (as proposed to be modified) requiring development to provide a compelling new reason to visit

the town and for it to integrate with, support and not undermine existing uses and attractions, it is not necessary to the soundness of the plan for the policy to specifically preclude amusement park development at the Leisure Quarter.

78. In conclusion, subject to **MM07** and **MM19 – MM24**, the plan's strategy for retail and other town centre uses is positively prepared, justified, effective and consistent with national policy.

**Issue 5 – Does the plan set out policies for transport, green infrastructure, water management, sustainable design and renewable/low carbon energy which are positively prepared, justified, effective and consistent with national policy?**

79. Policy CS5 sets out a positively prepared strategy for the development and promotion of a sustainable and efficient transport network and it addresses rail, tram, bus and coach facilities, car parking, eliminating road congestion "pinch points", pedestrian and cycle routes and Blackpool Airport. The policy, and the plan more generally, appropriately balance car use and other modes of transport, in line with national policy, and it is not necessary to the soundness of the plan for it to specifically state that for some development there may be no alternative to car use. However, in the interests of effectiveness, it is appropriate for part 5 of the policy to apply to all, not just town centre, car parking and thus **MM08** is required.
80. Policy CS6 seeks to protect and enhance the Borough's green infrastructure consistent with the Framework's core principle of conserving and enhancing the natural environment. Given that there are no ancient or veteran trees in Blackpool reference to these is not necessary; nor is a target for the creation of new woodland necessary to the soundness of the plan. The policy seeks to protect designated sites of biological/geological importance and indicates that where necessary development will be required to mitigate its impact on these sites. The policy does not prevent appropriate development adjacent to such sites and thus a modification to permit such development is not needed.
81. The policy's aim of protecting existing open space, sports and recreational buildings and land, unless the requirements of Framework paragraph 74 are met, accords entirely with national policy (including the reference to "existing open space") and there is no convincing evidence to justify an alternative approach being taken in Blackpool. In connection with this it has been argued that the former Co-op Sports Club and Fields site at Preston New Road should be allocated for residential development. Given its potential for a maximum of 60 or so dwellings it is not a site of strategic significance warranting consideration as part of the Core Strategy. The case for the site's allocation for housing will therefore be most appropriately considered in the preparation and examination of the SADMPD or as part of the normal determination of a planning application if a scheme for the site were to come forward before adoption of the SADMPD.
82. Consistent with section 10 of the Framework policy CS9 seeks to reduce flood risk and manage the impacts of flooding. **MM10** and **MM11**, indicating that unless unavoidable new development should not discharge surface water into the existing combined sewer network, is necessary for the plan to be justified. Modification to policy CS10 in connection with the Housing Standards Review

is covered in Matter 2 above. However, the element of **MM12** which concerns wind turbine development is necessary to accord with national policy as set out in a recent Written Ministerial Statement. Policy CS10's requirements in terms of non-residential development are consistent with the Framework's core principle of supporting the transition to a low carbon future and there is no evidence to indicate that they are not justified, nor would be effective.

83. In conclusion, subject to **MM08** and **MM10 - MM12**, the plan's policies for transport, green infrastructure, water management, sustainable design and renewable/low carbon energy are positively prepared, justified, effective and consistent with national policy.

**Issue 6 – Does the plan set out policies for quality of design and heritage which are positively prepared, justified, effective and consistent with national policy?**

84. It has been argued that the plan's evidence base on the historic environment is inadequate, that as a whole it does not give sufficient emphasis to providing a specific and positive strategy for the conservation and enjoyment of Blackpool's heritage and that many of the plan's policies should additionally include criteria or references to historic heritage matters.
85. The published evidence base in support of the plan includes Heritage Characterisation Studies covering eight key areas of interest in the Borough. The studies are extremely comprehensive and together comprise over 800 pages of analysis of the Borough's built-heritage and its significance. I am satisfied that this is more than sufficient to meet the requirements of paragraph 169 of the Framework. There are numerous references throughout the plan to the importance of Blackpool's heritage and its conservation, including in the Spatial Portrait and key objective 5 ("...conserving and enhancing Blackpool's rich heritage..."). Policy CS8 sets out an overarching strategy to achieve this objective.
86. As a general principle, the way in and extent to which the plan addresses historic heritage is soundly based, bearing in mind its role as a Core Strategy, supported by more specific saved policies of the Blackpool Local Plan (2006) which will in due course be replaced by development management policies in the SADMPD. In addition to the overarching heritage policy CS8, several other of the plan's policies include criteria relating to heritage where this is of particular relevance (eg CS18 concerning the Winter Gardens). However, the plan must be read as a whole and it is not necessary for there to be criteria concerning heritage in every, or even many of, the policies.
87. Nonetheless, policy CS8 is inconsistent in its wording and thus lacks clarity. **MM09** which addresses this is consequently necessary to the plan's effectiveness. The precise wording of this modification has been slightly amended from that consulted upon, reflecting comments made by Historic England, to ensure that it accords with national policy.
88. Consistent with the Framework's core planning principle (paragraph 17) of securing high quality design, policy CS7 sets out detailed requirements for new development. Given that it is addressed in policy CS6 there is no need to refer to the natural environment, biodiversity or ecological networks in this

policy.

89. In conclusion, subject to **MM09**, the plan's policies in respect of quality of design and heritage are positively prepared, justified, effective and consistent with national policy.

**Issue 7 – Are the plan's strategy and policies in respect of Blackpool Resort Core positively prepared, justified, effective and consistent with national policy?**

90. The defined Resort Core extends from Blackpool Town Centre along the seafront for some 4km or so. It includes many of the resort's key leisure and entertainment attractions and facilities for tourists and is fundamental to the character of Blackpool as a seaside resort. The importance of the area to the Borough's character and economy justifies support for new tourism attractions in the Resort Core, in addition to the town centre, as detailed in policy CS21 and in policy CS17 (as proposed to be modified). Given the need to regenerate key parts of the Resort Core, and the Borough's constrained boundaries and limited land availability, it makes sense for policy CS21 to seek to focus new tourism attractions and visitor accommodation in this area and the town centre, whilst supporting the enhancement of existing such facilities elsewhere in the town. The detailed modifications to the policy suggested by a representor are not necessary to the soundness of the plan as a Core Strategy and, in any case, the policy as it stands does not conflict with the suggested wording. However, to be justified and effective, **MM25** is necessary to make clear in policy CS21's supporting text that ancillary retail and food/beverage uses related to marketing the existing tourism offer will be permitted.
91. Policy CS22 is a positively prepared policy recognising the importance of the attractiveness of key gateways to the resort in attracting visitors to Blackpool. However, for the sake of clarity, and thus effectiveness, modifications **MM26** and **MM27** are necessary to include the parking provision element of supporting text paragraph 7.39 in the policy itself and to refer to the importance of peak visitor day parking requirements in the supporting text.
92. Reflecting the change in visitors' staying habits, the *Fylde Coast Visitor Accommodation Study (2009)* identified an over-supply of around 14,000 bed spaces in Blackpool and policy CS23 seeks to achieve an economically viable level of quality holiday accommodation: generally safeguarding such accommodation in key promenade hotel frontages and in the main holiday accommodation areas whilst permitting change of use to permanent residential accommodation in other areas.
93. There is no challenge to the principle of the policy, and in the light of the *Visitor Accommodation Study* and the clear need to regenerate parts of the Borough's inner areas it is soundly based. However, concern has been raised at the precise boundaries of the main holiday accommodation areas, as currently defined in the March 2011 *Holiday Accommodation Supplementary Planning Document (SDP)*. Having regard to Doc EL3.004 I am satisfied that it is appropriate for the precise boundaries of each area/frontage to be defined in the SPD and the Council has indicated its intention to review the SPD and the boundaries defined in it. Given the effect of the policy and the SPD on individual small businesses, and the need for ongoing regeneration of the

inner area, I urge the Council to complete the review as soon as possible.

94. In conclusion, subject to the recommended modifications **MM25 – MM27**, the plan's strategy and policies in respect of Blackpool Resort Core are positively prepared, justified, effective and consistent with national policy.

**Issue 8 – Are the plan's strategy and policies in respect of South Blackpool Growth and Enhancement positively prepared, justified, effective and consistent with national policy?**

95. Policies CS24 – CS27 set out a positively prepared strategy to co-ordinate the housing and employment growth in the areas around Junction 4 of the M55 and the Airport in South Blackpool. The policies appropriately seek to prioritise the use of sustainable modes of transport and support a neighbourhood planning approach for Marton Moss. Whilst Fylde Council has suggested some clarification of the plan's supporting text concerning proposals for its area close to Junction 4 these do not fundamentally challenge the plan nor affect its soundness.
96. In the interests of clarity and effectiveness **MM28** is necessary to require that the impacts of housing developments in the area on surface and waste water are appropriately managed, given that no such impact, currently referred to in the policy, may not be realistic. **MM29** which includes in policy CS25's supporting text requirements in connection with the protection of Natura 2000 sites, is also necessary to soundness given the possible impact of housing development in the area on these designations.
97. Marton Moss has a particularly distinctive, semi-rural character, reflecting its past as an area of market gardening, which is valued by the local community. Policy CS26 identifies the limited development which will be permitted in this area in the period until a local policy framework has been developed through the neighbourhood planning process. However, as currently worded, the policy is potentially more restrictive than national policy set out in paragraph 55 of the Framework. Consequently, to be justified, **MM30** is required to ensure consistency with this aspect of national policy.
98. In conclusion, subject to **MM28 – MM30**, the plan's strategy and policies in respect of South Blackpool Growth and Enhancement are positively prepared, justified, effective and consistent with national policy.

**Issue 9 - Having regard to national standards, would the requirements of the policies of the plan put the viability of its implementation as a whole at serious risk?**

99. In preparing the plan the Council commissioned URS Infrastructure and Environment UK Ltd and HDH Planning and Development to, amongst other things, assess the effect on the viability of development of the plan's affordable housing and other policy requirements. Following analysis of Blackpool's residential and non-residential property markets the consultants undertook viability appraisals of a range of developments likely to come forward in the Borough during the plan period. In response to the consultants' report of February 2014 the Council modified the draft plan to remove the requirement for inner area residential development to provide affordable housing.

100. Bearing this in mind, and in the light of section 12 of the report (Viability of the Core Strategy), there is evidence to show that, having regard to national standards, the plan's policies and requirements would not put the viability of its implementation as a whole at serious risk. In this context Policy CS11, which sets out requirements in relation to Planning Obligations, is soundly based.

### Other Matters

101. It has been argued that the Sustainability Appraisal (SA) of the plan (May 2014 Report) is inadequate because it does not assess, as reasonable alternatives, figures in the 250-400 dpa range (which the 2014 SHMA identified as the objectively assessed need for housing) above or below the plan's requirement figure of 280dpa. Paragraphs 6.11 – 6.14 of the *Blackpool's Housing Requirement Technical Paper* assesses the 280dpa figure along with 250dpa and 380dpa against four aspects of sustainability of relevance to the plan (accommodating population growth, Blackpool's economy, meeting affordable housing need and balancing constraints to delivery). Para 6.14 concludes that 250dpa and 380dpa would not deliver sustainable development and are thus not considered to be realistic options. This is summarised in paragraph 3.4 of the SA.

102. Having regard to Doc EL3.002 I am satisfied that the Sustainability Appraisal meets the requirements of the SEA Directive (2001/42/EC): the Council rationally considered (and evidenced) that higher and lower housing figures than 280 dpa would not meet the objectives of the plan. Such figures are therefore not realistic or reasonable alternatives requiring assessment as part of the Sustainability Appraisal. I am also satisfied that the Appraisal's assessment of the plan's policies against the identified SA Objectives (including landscape/townscape and heritage) are realistic and adequate.

103. Whilst a glossary of terms might be useful to assist non-planning specialists in understanding the plan this is not a matter which affects the soundness of the document. The schedule of main modifications consulted upon by the Council included **MM31**, concerning clarifications to be made to the *Habitats Regulations Appropriate Assessment Screening Report*. However, as this report does not form part of the Core Strategy itself, it is not necessary for me to recommend this modification as being necessary to the soundness of the plan.

### Assessment of Legal Compliance

104. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Blackpool Local Plan Part 1: Core Strategy is identified within the approved LDS (June 2014) which sets out an expected adoption date of September 2015. The plan's content is compliant with the LDS and whilst adoption of the plan will be slightly later than September 2015 this is not a failing in any material way.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in November 2014 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The <i>Habitats Regulations AA Screening Report</i> (May 2014 and as subsequently updated) sets out why AA is not necessary.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The plan complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

105. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

106. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Blackpool Local Plan Part 1: Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Malcolm Rivett*

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

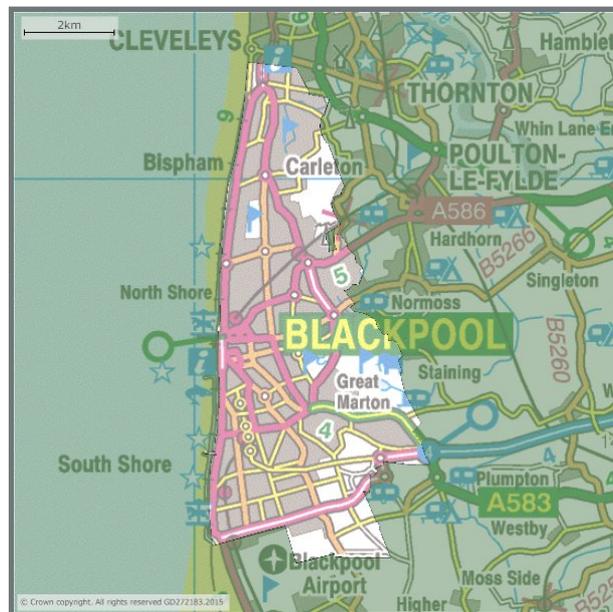
# Appendix 3

**NOMIS Labour Market Statistics for Blackpool**

# nomis official labour market statistics

## Labour Market Profile - Blackpool

The profile brings together data from several sources. Details about these and related terminology are given in the definitions section.



## Resident Population

### Total population (2016)

	Blackpool (Numbers)	North West (Numbers)	Great Britain (Numbers)
All People	139,200	7,219,600	63,785,900
Males	68,800	3,560,900	31,462,500
Females	70,400	3,658,700	32,323,500

Source: ONS Population estimates - local authority based by five year age band

### Population aged 16-64 (2016)

	Blackpool (Numbers)	Blackpool (%)	North West (%)	Great Britain (%)
All People Aged 16-64	85,400	61.4	62.8	63.1
Males Aged 16-64	42,800	62.2	63.4	63.8
Females Aged 16-64	42,500	60.4	62.1	62.4

Source: ONS Population estimates - local authority based by five year age band

Notes: % is a proportion of total population

## Labour Supply

### Employment and unemployment (Jul 2016-Jun 2017)

	<b>Blackpool (Numbers)</b>	<b>Blackpool (%)</b>	<b>North West (%)</b>	<b>Great Britain (%)</b>
<b>All People</b>				
Economically Active†	63,800	75.4	76.0	78.0
In Employment†	60,000	71.0	72.4	74.4
Employees†	51,000	60.5	63.0	63.4
Self Employed†	8,300	9.7	9.1	10.6
Unemployed (Model-Based)§	3,800	5.9	4.7	4.6
<b>Males</b>				
Economically Active†	34,200	80.3	80.8	83.2
In Employment†	31,800	74.4	76.6	79.2
Employees†	25,500	60.2	63.9	64.7
Self Employed†	5,700	13.2	12.4	14.2
Unemployed§	2,400	7.1	5.1	4.7
<b>Females</b>				
Economically Active†	29,600	70.5	71.3	72.9
In Employment†	28,300	67.4	68.2	69.6
Employees†	25,500	60.9	62.1	62.1
Self Employed†	2,500	6.2	5.9	7.1
Unemployed§	1,300	4.3	4.3	4.4

Source: ONS annual population survey

† - numbers are for those aged 16 and over, % are for those aged 16-64

§ - numbers and % are for those aged 16 and over. % is a proportion of economically active

**Economic inactivity (Jul 2016-Jun 2017)**

	<b>Blackpool (Level)</b>	<b>Blackpool (%)</b>	<b>North West (%)</b>	<b>Great Britain (%)</b>
<b>All People</b>				
Total	20,300	24.6	24.0	22.0
Student	3,500	17.1	24.2	26.8
Looking After Family/Home	5,700	27.9	23.2	24.5
Temporary Sick	#	#	2.2	1.9
Long-Term Sick	7,600	37.1	26.7	22.0
Discouraged	!	!	0.6	0.4
Retired	1,800	8.8	13.9	13.5
Other	1,400	7.0	9.1	10.9
Wants A Job	6,900	33.9	23.2	23.5
Does Not Want A Job	13,500	66.1	76.8	76.5

Source: ONS annual population survey

# Sample size too small for reliable estimate

! Estimate is not available since sample size is disclosive

Notes: numbers are for those aged 16-64.

% is a proportion of those economically inactive, except total, which is a proportion of those aged 16-64

**Workless Households (Jan-Dec 2016)**

	<b>Blackpool</b>	<b>North West</b>	<b>Great Britain</b>
Number Of Workless Households	10,000	422,200	3,043,300
Percentage Of Households That Are Workless	22.0	18.0	15.1
Number Of Children In Workless Households	#	178,300	1,353,400
Percentage Of Children Who Are In Households That Are Workless	#	13.3	11.4

**Blackpool      North West      Great Britain**

Source: ONS annual population survey - households by combined economic activity status

# Sample size too small for reliable estimate

Notes: Only includes those households that have at least one person aged 16 to 64.

Children refers to all children aged under 16.

### Employment by occupation (Jul 2016-Jun 2017)

	<b>Blackpool (Numbers)</b>	<b>Blackpool (%)</b>	<b>North West (%)</b>	<b>Great Britain (%)</b>
Soc 2010 Major Group 1-3	19,700	33.0	42.1	45.5
1 Managers, Directors And Senior Officials	4,900	8.1	9.8	10.7
2 Professional Occupations	8,000	13.2	18.6	20.3
3 Associate Professional & Technical	6,900	11.5	13.6	14.3
Soc 2010 Major Group 4-5	13,900	23.3	21.2	20.7
4 Administrative & Secretarial	7,000	11.7	10.7	10.3
5 Skilled Trades Occupations	6,900	11.5	10.4	10.3
Soc 2010 Major Group 6-7	13,400	22.5	18.5	16.8
6 Caring, Leisure And Other Service Occupations	6,700	11.2	10.0	9.2
7 Sales And Customer Service Occs	6,700	11.2	8.5	7.5
Soc 2010 Major Group 8-9	12,600	21.2	18.2	17.0
8 Process Plant & Machine Operatives	4,000	6.7	7.0	6.3
9 Elementary Occupations	8,600	14.4	11.2	10.6

Source: ONS annual population survey

Notes: Numbers and % are for those of 16+

% is a proportion of all persons in employment

### Qualifications (Jan 2016-Dec 2016)

	<b>Blackpool (Level)</b>	<b>Blackpool (%)</b>	<b>North West (%)</b>	<b>Great Britain (%)</b>
Individual Levels				
NVQ4 And Above	21,200	25.7	34.0	38.2
NVQ3 And Above	38,400	46.7	53.7	56.9
NVQ2 And Above	58,800	71.5	73.0	74.3
NVQ1 And Above	69,300	84.2	84.8	85.3
Other Qualifications	5,000	6.1	5.7	6.6
No Qualifications	8,000	9.7	9.5	8.0

Source: ONS annual population survey

Notes: For an explanation of the qualification levels see the definitions section.

Numbers and % are for those of aged 16-64

% is a proportion of resident population of area aged 16-64

### Earnings by place of residence (2017)

	<b>Blackpool (Pounds)</b>	<b>North West (Pounds)</b>	<b>Great Britain (Pounds)</b>
<b>Gross Weekly Pay</b>			
Full-Time Workers	437.7	514.5	552.7
Male Full-Time Workers	453.8	550.9	594.2
Female Full-Time Workers	408.9	464.6	494.4
<b>Hourly Pay - Excluding Overtime</b>			
Full-Time Workers	11.25	12.99	14.00
Male Full-Time Workers	11.68	13.45	14.56
Female Full-Time Workers	10.41	12.38	13.18

**Blackpool (Pounds)**      **North West (Pounds)**      **Great Britain (Pounds)**

Source: ONS annual survey of hours and earnings - resident analysis

Notes: Median earnings in pounds for employees living in the area.

## Out-Of-Work Benefits

Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise.

### Claimant count by sex - not seasonally adjusted (October 2017)

	Blackpool (Numbers)	Blackpool (%)	North West (%)	Great Britain (%)
All People	3,555	4.2	2.4	1.9
Males	2,305	5.4	3.0	2.3
Females	1,250	2.9	1.9	1.5

Source: ONS Claimant count by sex and age

Note: % is the number of claimants as a proportion of resident population of area aged 16-64 and gender

### Claimant count by age - not seasonally adjusted (October 2017)

	Blackpool (Level)	Blackpool (%)	North West (%)	Great Britain (%)
Aged 16+	3,555	4.2	2.4	1.9
Aged 16 To 17	0	0.0	0.1	0.1
Aged 18 To 24	570	5.1	3.5	2.8
Aged 18 To 21	335	5.4	3.7	3.0
Aged 25 To 49	2,055	4.8	2.7	1.9
Aged 50+	930	3.3	1.8	1.6

Source: ONS Claimant count by sex and age

Note: % is number of claimants as a proportion of resident population of the same age

### Working-age client group - main benefit claimants - not seasonally adjusted (November 2016)

	Blackpool (Numbers)	Blackpool (%)	North West (%)	Great Britain (%)
Total Claimants	18,150	21.3	13.2	11.0
<b>By Statistical Group</b>				
Job Seekers	1,590	1.9	1.0	1.1
ESA And Incapacity Benefits	10,990	12.9	7.8	6.1
Lone Parents	1,360	1.6	1.0	1.0
Carers	2,640	3.1	2.1	1.7
Others On Income Related Benefits	330	0.4	0.2	0.2
Disabled	1,040	1.2	0.8	0.8
Bereaved	190	0.2	0.2	0.2
Main Out-Of-Work Benefits†	14,270	16.7	10.1	8.4

Source: DWP benefit claimants - working age client group

† Main out-of-work benefits includes the groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits. See the **Definitions and Explanations** below for details

Notes: % is a proportion of resident population of area aged 16-64

Figures in this table do not yet include claimants of Universal Credit

## Labour Demand

### Jobs density (2015)

	Blackpool (Jobs)	Blackpool (Density)	North West (Density)	Great Britain (Density)
Jobs Density	67,000	0.78	0.79	0.83

Source: ONS jobs density

Notes: The density figures represent the ratio of total jobs to population aged 16-64.

Total jobs includes employees, self-employed, government-supported trainees and HM Forces

### Employee jobs (2016)

	Blackpool (Employee Jobs)	Blackpool (%)	North West (%)	Great Britain (%)
Total Employee Jobs	61,000	-	-	-
Full-Time	35,000	57.4	67.0	67.8
Part-Time	26,000	42.6	33.0	32.2

### Employee Jobs By Industry

B : Mining And Quarrying	0	0.0	0.0	0.2
C : Manufacturing	3,500	5.7	9.9	8.1
D : Electricity, Gas, Steam And Air Conditioning Supply	100	0.2	0.4	0.4
E : Water Supply; Sewerage, Waste Management And Remediation Activities	150	0.2	0.9	0.7
F : Construction	1,000	1.6	4.0	4.6
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	9,000	14.8	15.3	15.3
H : Transportation And Storage	2,000	3.3	5.5	4.9
I : Accommodation And Food Service Activities	8,000	13.1	7.9	7.5
J : Information And Communication	900	1.5	2.7	4.2
K : Financial And Insurance Activities	600	1.0	3.0	3.6
L : Real Estate Activities	600	1.0	1.6	1.6
M : Professional, Scientific And Technical Activities	2,000	3.3	8.5	8.6
N : Administrative And Support Service Activities	2,500	4.1	8.5	9.0
O : Public Administration And Defence; Compulsory Social Security	6,000	9.8	4.4	4.3
P : Education	4,500	7.4	9.0	8.9
Q : Human Health And Social Work Activities	16,000	26.2	14.4	13.3
R : Arts, Entertainment And Recreation	4,000	6.6	2.3	2.5
S : Other Service Activities	700	1.1	1.5	2.1

Source: ONS Business Register and Employment Survey : open access

- Data unavailable

Notes: % is a proportion of total employee jobs excluding farm-based agriculture

Employee jobs excludes self-employed, government-supported trainees and HM Forces

Data excludes farm-based agriculture

### Earnings by place of work (2017)

	Blackpool (Pounds)	North West (Pounds)	Great Britain (Pounds)
<b>Gross Weekly Pay</b>			
Full-Time Workers	460.2	514.0	552.3
Male Full-Time Workers	479.9	550.1	594.1
Female Full-Time Workers	446.7	464.6	494.0

	Blackpool (Pounds)	North West (Pounds)	Great Britain (Pounds)
<b>Hourly Pay - Excluding Overtime</b>			
Full-Time Workers	12.08	12.99	13.99
Male Full-Time Workers	12.55	13.42	14.56
Female Full-Time Workers	11.70	12.41	13.17

Source: ONS annual survey of hours and earnings - workplace analysis

Notes: Median earnings in pounds for employees working in the area.

### Civil service jobs as a proportion of employee jobs (2017)

	Blackpool (Headcount)	Blackpool (%)	North West (%)	Great Britain (%)
Total civil service jobs	3,500	6.1	1.7	1.4
Full-time	2,140	3.8	1.2	1.1
Part-time	1,360	2.4	0.5	0.3

Source: ONS Annual Civil Service Employment Survey

Note: Percentages based on % of total jobs in area that are civil service jobs

### Composition of civil service jobs by sex and hours worked (2017)

	Blackpool (Headcount)	Blackpool (%)	North West (%)	Great Britain (%)
Total civil service jobs	3,500	-	-	-
Full-time	2,140	61.1	71.1	76.3
Part-time	1,360	38.9	28.9	23.7
Male	1,130	32.3	41.1	45.6
Full-time	960	27.4	36.5	41.4
Part-time	170	4.9	4.6	4.2
Female	2,370	67.7	58.9	54.4
Full-time	1,180	33.7	34.6	35.0
Part-time	1,190	34.0	24.3	19.5

Source: ONS Annual Civil Service Employment Survey

Note: Percentages based on % of Total Civil Service Jobs made up of each category

## Businesses

### UK Business Counts (2017)

	Blackpool (Numbers)	Blackpool (%)	North West (Numbers)	North West (%)
<b>Enterprises</b>				
Micro (0 To 9)	3,390	87.7	230,660	88.7
Small (10 To 49)	390	10.1	24,155	9.3
Medium (50 To 249)	70	1.8	4,265	1.6
Large (250+)	15	0.4	975	0.4
Total	3,865	-	260,060	-
<b>Local Units</b>				
Micro (0 To 9)	3,920	80.8	257,395	83.3
Small (10 To 49)	755	15.6	41,610	13.5
Medium (50 To 249)	160	3.3	8,695	2.8
Large (250+)	20	0.4	1,355	0.4

	<b>Blackpool (Numbers)</b>	<b>Blackpool (%)</b>	<b>North West (Numbers)</b>	<b>North West (%)</b>
Total	4,850	-	309,060	-

Source: Inter Departmental Business Register (ONS)

Note: % is as a proportion of total (enterprises or local units)

## Definitions And Explanations

### Resident Population

The estimated population of an area includes all those usually resident in the area, whatever their nationality. HM Forces stationed outside the United Kingdom are excluded but foreign forces stationed here are included. Students are taken to be resident at their term-time address.

### Labour Supply

Labour supply consists of people who are employed, as well as those people defined as unemployed or economically inactive, who can be considered to be potential labour supply. Information in this section relates to the characteristics of people living in an area.

Most labour supply data comes from the Annual Population Survey (APS). The APS is the largest regular household survey in the United Kingdom. It includes data from the Labour Force Survey (LFS), plus further sample boosts in England, Wales and Scotland. The survey includes data from a sample of around 256,000 people aged 16 and over.

As APS estimates are based on samples, they are subject to sampling variability. This means that if another sample for the same period were drawn, a different estimate might be produced. In general, the larger the number of people in a sample, the smaller the variation between estimates. Estimates for smaller areas such as local authorities are therefore less reliable than those for larger areas such as regions. When the sample size is too small to produce reliable estimates, the estimates are replaced with a #.

### Economically Active

#### Economically Active

People who are either in employment or unemployed.

#### Economic Activity Rate

People, who are economically active, expressed as a percentage of all people.

#### In Employment

People who did some paid work in the reference week (whether as an employee or self employed); those who had a job that they were temporarily away from (eg, on holiday); those on government-supported training and employment programmes; and those doing unpaid family work.

#### Employment Rate

The number of people in employment expressed as a percentage of all people aged 16-64.

#### Employees And Self Employed

The division between employees and self employed is based on survey respondents' own assessment of their employment status. The percentage show the number in each category as a percentage of all people aged 16-64. The sum of employees and self employed will not equal the **in employment** figure due to the inclusion of those on government-supported training and employment programmes, and those doing unpaid family work in the latter.

#### Unemployed

Refers to people without a job who were available to start work in the two weeks following their interview and who had either looked for work in the four weeks prior to interview or were waiting to start a job they had already obtained.

#### Model-Based Unemployed

As unemployed form a small percentage of the population, the APS unemployed estimates within local authorities are based on very small samples so for many areas would be unreliable. To overcome this ONS has developed a statistical model that provides better estimates of total unemployed for unitary authorities and local authority districts (unemployment estimates for counties are direct survey estimates). Model-based estimates are not produced for male or female unemployed.

The model-based estimate improves on the APS estimate by *borrowing strength* from the Claimant Count to produce an estimate that is more precise (i.e. has a smaller confidence interval). The number of people measured by the Claimant Count is not itself a measure of unemployment but is strongly correlated with

unemployment, and, as it is an administrative count, is known without sampling error. The gain in precision is greatest for areas with smaller sample sizes.

## Unemployment Rate

Unemployed as a percentage of the economically active population.

## Economically Inactive

### Economically Inactive

People who are neither in employment nor unemployed. This group includes, for example, all those who were looking after a home or retired.

### Wanting A Job

People not in employment who want a job but are not classed as unemployed because they have either not sought work in the last four weeks or are not available to start work.

### Not Wanting A Job

People who are neither in employment nor unemployed and who do not want a job.

## Workless Households

### Households

A household is defined as a single person, or a group of people living at the same address who have the address as their only or main residence and either share one main meal a day or share living accommodation (or both). For the purposes of this table, estimates only include those households where at least 1 person is aged 16 to 64.

### Workless Households

Households where no-one aged 16 or over is in employment. These members may be unemployed or economically inactive. Economically inactive members may be unavailable to work because of family commitments, retirement or study, or unable to work through sickness or disability.

### Children

Children refers to all children under 16.

## Occupation

Occupations are classified according to the Standard Occupation Classification 2010. Descriptions of the job titles included in each code are available in the [SOC manuals](#).

## Qualifications

Qualifications data are only be available from the APS for calendar year periods, for example, Jan to Dec 2005. The variables show the total number of people who are qualified at a particular level and above, so data in this table are not additive. Separate figures for each NVQ level are available in the full Annual Population Survey data set (Query data).

The trade apprenticeships are split 50/50 between NVQ level 2 and 3. This follows ONS policy for presenting qualifications data in publications. Separate counts for trade apprenticeships can be obtained from the full APS data set (Query data).

### No Qualifications

No formal qualifications held.

### Other Qualifications

includes foreign qualifications and some professional qualifications.

### NVQ 1 Equivalent

e.g. fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1, intermediate 1 national qualification (Scotland) or equivalent.

### NVQ 2 Equivalent

e.g. 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent.

### NVQ 3 Equivalent

e.g. 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent.

### NVQ 4 Equivalent And Above

e.g. HND, Degree and Higher Degree level qualifications or equivalent.

## Earnings By Residence

The figures show the median earnings in pounds for employees living in the area who are on adults rates of pay and whose pay was not affected by absence. Figures for earnings come from the Annual Survey of Hours and Earnings (ASHE). The ASHE is based on a 1 per cent sample of employees, information on whose earnings and hours is obtained from employers. The survey does not cover self-employed. Information relates to a pay period in April.

The earnings information collected relates to gross pay before tax, national insurance or other deductions, and excludes payments in kind. It is restricted to earnings relating to the survey pay period and so excludes payments of arrears from another period made during the survey period; any payments due as a result of a pay settlement but not yet paid at the time of the survey will also be excluded.

## Out-Of-Work Benefits

### Claimant Count (Experimental Statistics)

The Claimant Count is the number of people claiming benefit principally for the reason of being unemployed. This is measured by combining the number of people claiming Jobseeker's Allowance (JSA) and National Insurance credits with the number of people receiving Universal Credit principally for the reason of being unemployed. Claimants declare that they are out of work, capable of, available for and actively seeking work during the week in which the claim is made.

The measure of the number of people receiving Universal Credit principally for the reason of being unemployed is still being developed by the Department for Work and Pensions. Consequently this component of the total Claimant Count does not yet correctly reflect the target population of unemployed claimants and is subject to revisions. For this reason the Claimant Count is currently designated as Experimental Statistics.

The Claimant Count is mostly derived from DWP administrative systems. For various reasons, e.g. a claimant's National Insurance number is not known, a small number of claims have to be dealt with manually. These clerical claims do not have as much detail as the computerised claims and therefore, whilst part of the claimant count by sex table, cannot be included the age breakdown.

### Rates By Age

Unemployment benefits normally only apply to people aged 18 years and over. They can only be claimed by 16 and 17 year olds in exceptional circumstances. Consequently the counts for this age group are typically very low.

## DWP Working-Age Client Group

The number of working-age people who are claiming one or more main DWP benefits. The main benefits are: bereavement benefit, carer's allowance, disability living allowance, ESA and incapacity benefit, severe disablement allowance, income support, jobseeker's allowance, and widow's benefit. The age at which women reach State Pension age is gradually increasing from 60 to 65 between April 2010 and April 2020. Throughout this period, only women below State Pension age are counted as working age benefit claimants."

The total count is broken down by statistical groups. These categorise each person according to the main reason why they are claiming benefit. Each client is classified to a single group.

Benefits are arranged hierarchically and claimants are assigned to a group according to the top most benefit they receive. Thus a person who is a lone parent and receives Incapacity Benefit would be classified as incapacity benefits. Consequently, the group lone parent will not contain all lone parents as some will be included in the incapacity benefits group and Job seekers groups.

**Main out-of-work benefits** consists of the groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits.

These groups have been chosen to best represent a count of all those benefit recipients who cannot be in full-time employment as part of their condition of entitlement. Those claiming solely Bereavement Benefits or Disability Living Allowance (DLA) are not included as these are not out-of-work or income based benefits. DLA is paid to those needing help with personal care. These people can, and some will, be in full-time employment. If DLA claimants are also in receipt of JSA, IS, ESA or Incapacity Benefits in addition to DLA they will be counted under the relevant statistical group. In addition, we exclude those claiming solely carer's benefits or claiming carer's benefits alongside income support, as DWP does not pursue active labour market policies for this group. Carer's benefits are paid to those with full time caring responsibilities. The group entitled to Carer's benefits alongside Income Support (IS) includes around 86,000 claimants and has been stable over time.

This Nomis series is different to that published in the Office for National Statistics (ONS) Labour Market Bulletin. The Nomis series uses DWP Jobseeker's Allowance numbers, whilst the Labour Market Bulletin uses the Claimant Count, using different methods, coverage and reference periods

## Labour Demand

Labour demand includes jobs available within the area.

## Jobs Density

The level of jobs per resident aged 16-64. For example, a job density of 1.0 would mean that there is one job for every resident aged 16-64.

The total number of jobs is a workplace-based measure and comprises employee jobs, self-employed, government-supported trainees and HM Forces. The number of residents aged 16-64 figures used to calculate jobs densities are based on the relevant mid-year population estimates.

## Employee Jobs

The number of jobs held by employees. Employee jobs excludes self-employed, government-supported trainees and HM Forces, so this count will be smaller than the total jobs figure shown in the Jobs density table. The information comes from the Business Register and Employment Survey (BRES) - an employer survey conducted in September of each year. The BRES records a job at the location of an employee's workplace (rather than at the location of the business's main office).

## Full-Time And Part-Time:

In the BRES, part-time employees are those working for 30 or fewer hours per week.

## Note

All figures exclude farm-based agriculture

## Earnings By Place Of Work

The figures show the median earnings in pounds for employees working in the area who are on adults rates of pay and whose pay was not affected by absence. Figures for earnings come from the Annual Survey of Hours and Earnings (ASHE). The ASHE is based on a 1 per cent sample of employees, information on whose earnings and hours is obtained from employers. The survey does not cover self-employed. In 2004 information related to the pay period which included 21 April.

The earnings information collected relates to gross pay before tax, national insurance or other deductions, and excludes payments in kind. It is restricted to earnings relating to the survey pay period and so excludes payments of arrears from another period made during the survey period; any payments due as a result of a pay settlement but not yet paid at the time of the survey will also be excluded.

## Annual Civil Service Employment Survey

The Annual Civil Service Employment Survey (ACSES) is based on a census of civil service departments on 31 March. ACSES counts all home Civil Service employees. It excludes the Northern Ireland Civil Service, other Crown servants and employees of the wider public sector. There are home Civil Service employees based in Northern Ireland and Overseas. Headcount statistics are based on the number of employees with an employment contract who are being paid by the organisation. Employees can be permanent, on a fixed-term contract or employed on a temporary basis. The self-employed, contract workers and agency workers are excluded. Employees not on the payroll and not being paid during the reference period are also excluded, for example, those on unpaid maternity leave, unpaid sick absence and career breaks. Full-time employees are those who are contracted to work 37 hours per week (36 hours per week in London for employees employed prior to 2013. Employees in London substantively promoted since 2013, or who have joined the Civil Service subsequent to this date, are now contracted to work 37 hours per week if on a full-time basis). Part-time employees are those who work less than the normal contracted hours.

Note ACSES data is currently only available for local authorities in England and Wales.

## UK Business Counts

The data contained in the table are compiled from an extract taken from the Inter-Departmental Business Register (IDBR) recording the position of units as at March of the reference year. The IDBR contains information on VAT traders and PAYE employers in a statistical register which provides the basis for the Office for National Statistics to conduct surveys of businesses.

The table presents analysis of businesses at both Enterprise and Local Unit level. An Enterprise is the smallest combination of legal units (generally based on VAT and/or PAYE records) which has a certain degree of autonomy within an Enterprise Group. An individual site (for example a factory or shop) in an enterprise is called a local unit.

The employment information on the IDBR is drawn mainly from the Business Register Employment Survey (BRES). Because this is based on a sample of enterprises, estimates from previous returns and from other ONS surveys have also been used. For the smallest units, either PAYE jobs or employment imputed from VAT turnover is used.

Estimates in the table are rounded to prevent disclosure.

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