

Regional Planning Guidance for the North West (RPG13)	
DP1	<p>Policy DP1 Economy in the Use of Land and Buildings - Development plans should adopt the following sequential approach to meeting development needs, taking account of local circumstances, the characteristics of particular land uses, and the Spatial Development Framework:</p> <p>i) the effective use of existing buildings and infrastructure within urban areas, including the re-use or conversion of empty buildings (if they are sound and worthy of re-use, and/or of architectural or historic interest) – particularly those which are accessible by way of public transport, walking or cycling;</p> <p>ii) the use of previously-developed land, particularly that which is accessible by public transport, walking or cycling; and then</p> <p>iii) the development of previously undeveloped land, where this avoids areas of important open space, is well located in relation to houses, jobs other services and infrastructure and is or can be made accessible by public transport, walking or cycling. The proposed development uses an important open space and is not well located with regards to jobs, services and facilities as shown in the attached Accessibility report, Appendix A.</p>
DP2	<p>Applying the principle of enhancing the quality of life set out in Policy DP2 when considering all new development proposals which will impact on biodiversity. The proposed development will have an adverse effect on the quality of life for the existing residents and those using the area for recreational purposes, and will cause a significant loss of ecological biodiversity.</p>
DP3	<p>Quality in the new development: DP3 requires the integration of the new development with the surrounding land use taking into account the landscape character, setting, the quality, distinctiveness and heritage of the environment. It also requires that the site be accessible to sustainable modes of transport. The proposed development will completely change the character of the area and the construction of 3 storey houses and 3 and 4 storey flats will overwhelm, not integrate with, the existing 1 and 2 storey houses. Although PPS3 recommends a minimum density of 30 dwellings per hectare, local authorities may agree lower densities with regard to the characteristics of the area including the current and proposed mix of uses. (See PPS3 paragraph 46 and 47 below.)</p> <p>Following comments by Blackpool transport, the developer are ‘agreeable to the layout being designed to allow a public transport route to operate through the site’. No further details have been forthcoming on this issue, even though it could necessitate the compulsory purchase of gardens on Moss House Road.</p>
UR7	<p>Local planning authorities should manage the availability of land identified in development plans to minimize the amount of land needed for new housing by:</p> <ul style="list-style-type: none"> • Bringing about a reduction in vacancy rates to 3% in existing dwelling stock through the increased re-use of suitable vacant housing; • Make allowances for the contribution that can be made by conversions to residential use and subdivision of existing dwellings; • Consider the impact of new housing development upon the existing housing stock and market in the immediate area and adjoining districts.

	<p>Under-used / vacant properties should be actively brought back into use and refurbished, which would be more energy efficient than building new homes. The proposed development would undermine existing markets and low demand areas closer to the town centre.</p> <p>(See also comments on the the Fylde Coast Strategic Housing Market Assessment below.)</p>
ER5	<p>Policy ER5 Biodiversity and Nature Conservation</p> <p>Planning authorities and other agencies in their plans, policies and proposals should ensure that the overall nature conservation resource in the North West is protected and enriched through conservation, restoration and re-establishment of key resources by:</p> <ul style="list-style-type: none"> ensuring that there is no net loss in the value of other biodiversity resources in the region; applying the principles of enhancing the quality of life set out in Policy DP2 when considering all new development proposals which impact biodiversity. <p>The proposed development will have an adverse effect on the quality of life for the existing residents and those using the area for recreational purposes, and will cause a significant loss of ecological biodiversity.</p>
ER6	<p>Woodlands - Local authorities will work with other regional partners to take every opportunity to increase the level of tree cover by at least 10% (or approximately 1000ha per annum) by 2010 and at least 15% by 2020, supporting native species in both urban and rural areas and also to promote the improvement and sustainable management of existing woodland.</p> <p>Opportunities for new planting must, however, be balanced against impacts on the natural and historic landscape, biodiversity and on agricultural land quality (see Policy RU1) and when reviewing development plans and other strategies local authorities must take account of the framework provided by Local Biodiversity Action Plans and Landscape Character Assessments.</p> <p>The response from Dr Sarah Manchester of the LCC Environment Directorate; ‘It is not clear whether or not an arboricultural assessment has been undertaken, and I have been unable to find any detailed information relating to the trees that would be felled as part of these proposals. The ES has stated that approximately 40 trees are mature/early mature, with 100 semi-mature trees, and that most of these trees would be lost to the development. It is disappointing that the development has not been designed to retain a greater number of the mature trees on site. The applicant should be required to submit further details of trees which would be lost to the development in order to inform the need for mitigation/compensation.’</p>
ER8	<p>In preparing development plans, local authorities should:</p> <ul style="list-style-type: none"> Discourage inappropriate development in areas at risk of flooding; Avoid developments that could lead to flood risk elsewhere either by reducing the ability of flood plains to store floodwaters or by creating unacceptable increases in surface run-offs; Take account of the longer-term impacts of climate change. <p>Flood risk must be considered at all stages of the planning and development process to avoid potential damage to property and even loss of life.</p> <p>The proposed development will greatly increase the danger of flooding for existing properties which, in turn, will increase the likelihood of property damage.</p>

The Main Drain all across the Moss was categorized as a FloodWatch watercourse by the Environment Agency w/c 21 January 2008.

The GroundSure report undertaken for the developers states that the British Geological Survey consider the development area to have a moderate potential for natural ground subsidence, which may cause damage to property. It concludes that professional advice should be taken before changing the ground in any way, for example carrying out building work. If the proposal is allowed, the developer should be required to fund the necessary surveys.

If structural surveys of existing properties indicate that this development WILL cause damage, this proposal may be considered to raise issues under Article eight and Article one of the first protocol to the Convention on Human Rights, a person is entitled to the right to respect for private and family life, and the peaceful enjoyment of his/her property.

	NW Regional Spatial Strategy
RSS DP1	<p>The following principles underpin RSS (incorporating RTS) Other regional, sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to these principles. All may be applicable to development management in particular circumstances:</p> <ul style="list-style-type: none"> • promote sustainable communities; (DP2) • promote sustainable economic development; (DP3) • make the best use of existing resources and infrastructure; (DP4) • manage travel demand, reduce the need to travel, and increase accessibility; (DP5) • marry opportunity and need; (DP6) • promote environmental quality; (DP7) • mainstreaming rural issues; (DP8) • reduce emissions and adapt to climate change. (DP9)
RSS DP2	<p>Promote Sustainable Communities.</p> <p>Proposed development does not promote a sustainable community:</p> <ul style="list-style-type: none"> • Does not provide any long term employment • Detracts from the natural environment and conserves the region’s heritage • Puts a further strain on already stretched health and educational facilities • present inequalities; • Will increase concern for safety and security within existing residents and increase • Will have a negative impact in the Housing Market Renewal Areas within central Blackpool • Puts a further strain on already stretched public services • Provides no new facilities to meet the current and future needs of the whole community, • Propose a development that is not conveniently located to services or genuinely <ul style="list-style-type: none"> • accessible by public transport; <p>Does not provide any new areas for promoting physical exercise through opportunities for sport and formal / informal recreation, walking and cycling. It does, in fact, remove facilities that are currently used.</p>
RSS DP3	<p>Promote Sustainable Economic Development.</p> <p>Proposed development does not promote sustainable economic development (DP3) as it will provide no long term employment. It will remove the possibility of any future regeneration of the land for agricultural purposes and employment. New investment and development should be channeled into brownfield sites and areas in need of regeneration.</p>
RSS DP4	<p>Make the Best Use of Existing Resources and Infrastructure.</p> <p>Priority should be given to developments in locations consistent with the regional and sub-regional spatial frameworks which:</p> <ul style="list-style-type: none"> • build upon existing concentrations of activities and existing infrastructure;

	<ul style="list-style-type: none"> do not require major investment in new infrastructure, including transport, water supply and sewerage. Where this is unavoidable development should be appropriately phased to coincide with new infrastructure provision. <p>Development should accord with the following sequential approach:</p> <ul style="list-style-type: none"> first, using existing buildings (including conversion) within settlements, and previously developed land within settlements; second, using other suitable infill opportunities within settlements, where compatible with other RSS policies; third, the development of other land where this is well-located in relation to housing, jobs, other services and infrastructure <p>Proposed development will require new sewerage systems, additional public transport and educational facilities. Neither does it accord with the third development approach as it is not well-located in relation to other services and facilities. (See Appendix A).</p>
RSS DP5	<p>Manage Travel Demand; Reduce the Need to Travel, and Increase Accessibility.</p> <p>Proposed development will increase the use of private vehicular transport due to the lack of local employment and other facilities. (See Appendix A.)</p>
RSS DP6	<p>Marry Opportunity and Need.</p> <p>New investment and development should be channeled into brownfield sites and areas in need of regeneration, With limited local employment and no need for regeneration, this proposed development does not meet this requirement.</p>
RSS DP7	<p>Promote Environmental Quality</p> <p>Environmental quality (including air, coastal and inland waters), should be protected and enhanced, especially by:</p> <ul style="list-style-type: none"> understanding and respecting the character and distinctiveness of places and landscapes; the protection and enhancement of the historic environment; promoting good quality design in new development and ensuring that development respects its setting taking into account relevant design requirements, the NW Design Guide and other best practice; reclaiming derelict land and remediating contaminated land for end-uses to improve the image of the region and use land resources efficiently; maximising opportunities for the regeneration of derelict or dilapidated areas; assessing the potential impacts of managing traffic growth and mitigating the impacts of road traffic on air quality, noise and health; promoting policies relating to green infrastructure and the greening of towns and cities; maintaining and enhancing the tranquillity of open countryside and rural areas; maintaining and enhancing the quantity and quality of biodiversity and habitat; ensuring that plans, strategies and proposals which alone or in combination could have a significant effect on the integrity and conservation objectives of sites of international importance for nature conservation are subject to assessment, this includes assessment and amelioration of the potential impacts of development (and associated traffic) on air quality, water quality and water levels.

	<p>Proposed development will:</p> <ul style="list-style-type: none"> • Eradicate the existing character of the area; • Introduce designs not in keeping with the existing properties ie 3 and 4 storey flats in an area comprising bungalows and 2 storey houses; • Reclaim no derelict, just detract from the image of a countryside area; • Remove opportunities for regeneration as scarce resources will have to be diverted away from those areas most in need; • Increase road traffic, air quality and noise in the area; • Convert from countryside to ‘brownfield’ and area of 17 hectares of green space; • Destroy the tranquility of the countryside area; • Have a disastrous effect on the existing biodiversity of the area, as evidenced in the response from Dr Sarah Manchester of the LCC Environment Directorate;
RSS DP9	<p>Reduce Emissions and Adapt to Climate Change.</p> <p>The proposed development will increase carbon emissions with the increase in private transport. With the expected increase in water levels, the removal of a vast tract of green land that assists in the mitigation of local flooding, will compound the possible flood risk.</p>
RSS RDF1	<p>In the third and fourth priorities development should be focused in and around the centres of the towns and cities.</p> <p>5.1 This policy is the cornerstone of the RSS. Much of what comes later flows from this clear statement of spatial priorities for growth and development, investment and regeneration in the region.</p> <p>The proposed development on the edge of the town does not support this policy.</p>
RSS L1	<p>Proposals and schemes, for all major developments and regeneration schemes, and especially for housing, employment or mixed uses, should ensure appropriate health, cultural, recreational, sport, education and training provision from the outset including for example Children’s Centres and SureStart Initiatives.</p> <p>The proposed development will not contribute to the provision, or enhancement, of any of the above. It will, in fact, put further pressure on already overstretched facilities.</p>
RSS L2	<p>Understanding Housing Markets</p> <p>Local Authorities should develop an understanding of local and sub-regional housing markets by undertaking Strategic Housing Market Assessments, in order to adopt a concerted and comprehensive approach to:</p> <ul style="list-style-type: none"> • influence housing supply across all types, sizes, tenures and values to achieve a better match between supply and need; • improve the quality of the Region’s housing stock; • support housing market restructuring and renewal; • overcome increasing issues of affordability; and • ensure the needs of the wider population are met, including disabled people, students, older people, black & minority ethnic communities and families with

	<p>children, including single headed households.</p> <p>The provision of 549 flats and terraced homes in an area with limited public transport:</p> <ul style="list-style-type: none"> • will not improve the quality of the region’s housing stock where there is already an over supply of this type of accommodation; • will not support housing market restructuring and renewal when many brand new properties of this type already stand empty; • will not increase affordability in the current economic climate; • will not help in the needs of disadvantaged groups as the proposed access and local facilities are so limited.
<p>RSS L3</p>	<p>Plans and strategies, across the North West, should reduce vacancy rates to 3% in the existing dwelling stock, through the increased re-use of suitable vacant housing.</p> <p>Local authorities are encouraged to take a positive, coordinated approach towards dealing with under used housing stock, for example by identifying vacant and underused properties and introducing empty property strategies to help bring them back into full use.</p> <p>Under-used / vacant properties should be actively brought back into use and refurbished, which would be more energy efficient than building new homes. The proposed development would undermine existing markets and low demand areas closer to the town centre.</p> <p>(See also comments on the the Fylde Coast Strategic Housing Market Assessment below.)</p>
<p>RSS L4</p>	<p>Local authorities should maximise the re-use of vacant and under-used brownfield land and buildings in line with Policy DP4 and indicative targets set out in Table 7.1.</p> <p>According to the Private Sector Stock condition Survey 2007, Blackpool has a higher percentage of unoccupied dwellings than the NW average and, of these, 1450 were classed as long term vacant i.e. empty for more than 6 months.</p> <p>Development of these empty properties and also those which might be viewed as ‘first time buyer properties’ by local authorities and housing associations would:</p> <ul style="list-style-type: none"> • Generate movement in the housing market; • Provide needed social housing; • Provide local employment; • Assist with the regeneration of the inner town; • Remove the need for this development, as no social housing has been included. <p>Local Planning Authorities should take the following guiding principles into account when deciding how development should be phased:</p> <ul style="list-style-type: none"> • sites should not be released unless sufficient capacity including water supply and waste-water treatment exists or can be provided ahead of the development without environmental harm in line with EM5. <p>Proposed development makes no mention of any intention to provide the necessary infrastructure <u>prior</u> to the start of development, and any development would cause irreparable ecological damage.</p>

RSS RT2	<p>Plans and strategies will need to be specific to the nature and scale of the problems identified, set clear objectives and specify what is being proposed, why it is necessary and what the impacts will be. They should:</p> <ul style="list-style-type: none"> • ensure that major new developments are located where there is good access to public transport, backed by effective provision for pedestrians and cyclists to minimise the need to travel by private car; • seek to reduce private car use through the introduction of ‘smarter choices’ (see examples in paragraph 8.6) and other incentives to change travel behaviour which should be developed alongside public transport, cycling and pedestrian network and service improvements; <p>The accessibility report (Appendix A) shows that the proposed development will greatly increase the use of private transport.</p>
RSS EM1	<p>The policies require that planning authorities:</p> <ul style="list-style-type: none"> • Give priority to conserving and enhancing habitats and species of international, national, regional and local importance • Avoid loss of or damage to natural assets, mitigate any unavoidable damage and compensate for loss/damage through offsetting actions, applying the principle of no net loss of resources as a minimum requirement • Ensure schemes result in an increase in biodiversity by contributing to the delivery of national, regional and local biodiversity objectives and targets and address issues of habitat fragmentation and species isolation <p>This development is incompatible with giving priority to conserving and enhancing habitats of national, regional and local importance. It would cause harm to natural assets, would result in the net loss of habitat and the proposed mitigation action does not demonstrate the delivery of national, regional and local biodiversity objectives and targets. The principle of net loss is absolutely fundamental. Policy EM1 of the RSS requires that applications deliver no net loss as a minimum of biodiversity value, and ideally create a ‘stepchange’ increase. (See response from Dr S. Manchester LCC Environment Directorate.)</p>
RSS EM5	<p>Local planning authorities and developers should protect the quantity and quality of surface, ground and coastal waters, and manage flood risk, by:</p> <ul style="list-style-type: none"> • working with the Water Companies and the Environment Agency when planning the location and phasing of development. Development should be located where there is spare capacity in the existing water supply and waste water treatment, sewer and strategic surface water mains capacity, insofar as this would be consistent with other planning objectives. Where this is not possible development must be phased so that new infrastructure capacity can be provided without environmental harm; • producing sub-regional or district level strategic flood risk assessments, guided by the Regional Flood Risk Appraisal. Allocations of land for development should comply with the sequential test in PPS25. Departures from this should only be proposed in exceptional cases where suitable land at lower risk of flooding is not available and the benefits of development outweigh the risks from flooding; • designing appropriate mitigation measures into the scheme, for any development which, exceptionally, must take place in current or future flood risk areas, to

	<p>ensure it is protected to appropriate standards, provides suitable emergency access under flood conditions, and does not increase the risk of flooding elsewhere;</p> <p>9.11 In its bid to achieve integrated water management, growth and development, the North West must respect the capacity of the water and wetland environments to cope with changes in land use, particularly as it can take between 5 and 25 years to plan and develop new water resource and waste water disposal schemes.</p> <p>9.12 It should be recognised that more subtle effects caused by climate change, such as changes in water table levels are important and need to be considered.</p> <p>The provision of any new infrastructure will cause irreparable environmental damage, as well as a major flood risk for those existing properties within the area, which will be subsumed by the proposed development. The greater the speed with which any new scheme is implemented, the greater the risk to existing properties.</p> <p>Non-concussive, augured pile foundations may not be feasible due to the necessary piling depths, and a dense system of concussive piles could cause deep sub-soil compaction and further restrict sub-surface water flow. This would affect the existing water table which, in turn, will influence structures built over it. The likelihood is that some areas will experience drying out while others will be surcharged through a diversion of the sub-surface water course.</p>
RSS EM16	<p>9.51 In July 2007, the Government published Building a Greener Future, a policy statement outlining a timetable for tightening national Building Regulations to achieve a 25% reduction in carbon emissions from new homes in 2010, and 44% in 2013, before reaching zero carbon in 2016.</p> <p>As the proposed development would continue into and beyond 2016, has satisfactory evidence been provided that the new properties will be carbon neutral?</p>
RSS EM18	<p>In advance of local targets being set, new non residential developments above a threshold of 1,000m² and all residential developments comprising 10 or more units should secure at least 10% of their predicted energy requirements from decentralised and renewable or low-carbon sources.</p> <p>What evidence has been provided to show how renewable energy will be utilized in the proposed development?</p>
RSS CLCR1	<p>Plans and strategies for the Central Lancashire City Region should:</p> <ul style="list-style-type: none"> • focus investment and sustainable development in the City of Preston and 3 towns of Blackburn, Burnley and Blackpool, raising economic performance, particularly through tourism and housing-led regeneration in Blackpool; • developing new employment opportunities in accordance with policies W1 to W3 and addressing localised problems of worklessness; • provide for a range of good quality housing, accessible to local facilities; • improve the City Region’s internal and external transport links, in line with the transport investment and management priorities set out in policy RT10; • develop the role of Blackpool Airport, in line with policy RT5; • improve the accessibility of employment locations by sustainable transport modes,

	<p>Proposals and schemes will be directed primarily towards locations where they can contribute to these priorities.</p> <p>The proposed development:</p> <ul style="list-style-type: none"> • will not aid economic performance through tourism; • will not increase employment opportunities, except in the short term and the builders may even bring in their own workforce; • the location is not easily accessible to local facilities or employment (see appendix A); • will put increased pressure on local transport links and will necessitate the reduction of the speed limit on Progress Way, which the council describes as ‘it’s fast route in and out of the borough’.
RSS CLCR2	<p>Development should be pursued in a manner that addresses worklessness, enhances urban quality, and contributes to the enhancement of the natural setting of the city/towns.</p> <p>The proposed development will not address employment issues. Development on the edges of the town will lead to less money being available for regeneration of the inner areas, and therefore does not support this policy.</p>
RSS CLCR3	<p>The unique ‘green’ character of the Central Lancashire City Region, and the advantages it offers for recreation and for attracting people and investment, will be protected and further enhanced by the greening of urban areas, through measures including:</p> <ul style="list-style-type: none"> • the renovation of existing parks; the reclamation of derelict land for ‘soft’ end uses; • the utilisation of open space adjacent to waterways, such as the Leeds-Liverpool Canal; • the creation of green wedges extending into the countryside. <p>The proposal will remove much of the very limited ‘green space’ that still exists in Blackpool that is currently used for existing recreational purposes. If the area must be developed, due to the nature of the land, which is called the Moss for a reason, and the high quality of the soil, it would be better used for allotments, parkland, or even new family orientated tourist facilities such as those provided at Ribby Hall.</p> <p>Therefore contrary to the statement in paragraph 4.2.8 of the developer’s Environmental Statement, this site could be considered as appropriate for commercial use, with increased, permanent employment opportunities.</p>

	Joint Lancashire Structure plan 2001-2016
Development Strategy	<p>Direct development away from areas of landscape and wildlife importance, principally the open coastal areas, and from areas at potential risk of flooding.</p> <p>Examples of planning applications that have been refused quoting a detrimental impact on the appearance and character of the Marton Moss countryside area: 07/0464 – refused as contrary to LQ1, LQ4, BH3, AS1 and NE2 of the Blackpool Local Plan 2001 – 2016. 07/0359 - refused as contrary to LQ14, BH3 and NE3 of the Blackpool Local Plan 2001 – 2016. 07/0623 - refused as contrary to NE2, NE3, BH3, AS1 and LQ6 of the Blackpool Local Plan 2001 – 2016. 08/1181 – refused as contrary to NE2, LQ1, LQ2, LQ3, LQ5, LQ6, BH3, BH20 and AS1 of the Blackpool Local Plan 2001 – 2016. Consequently, this proposal should also be refused.</p>
Development Framework Policy 1	<p>TARGET 1.1: The proportion of the population within 1km of 5 basic services (GP, primary school, food shop, post office, bus stop) to be maintained to at least the 1996 level of 73%, 2001-2016.</p> <p>The proposal fails to meet this target. The Accessibility Questionnaire completed by the developers has a total aggregate score of 22. The response that we have compiled using data from the developer’s own environmental statement, the internet and the use of an odometer, shows a score of 16 or less, giving a ‘Low’ accessibility level. (See Appendix A.)</p>
Housing Provision Policy 12	<p>In assessing the requirement for new housing provision, either for the purposes of Local Plan/Local Development Framework preparation or the determination of applications for residential development, the following approach should be taken; The need, or otherwise, to grant planning permission for a housing development will be determined by reference to the oversupply or undersupply of housing permissions in the context of Policy 12. Most Districts are in a situation of oversupply with planning permissions far exceeding the annual requirement. This is likely to be the case in most areas for a number of years.</p> <p>The approach described in this box will be used to implement and achieve the housing provision figures set out in Policy 12 and in Policy UR7 of Regional Spatial Strategy in line with the Plan, monitor and manage approach introduced by PPG3 (March 2000).</p> <p>The overall housing provision for 2001-2016 set out in Policy 12 for each District will represent the maximum housing provision that should not be exceeded. The fundamental aim in releasing sites, as PPG3 explains, should be to ensure that no more land is used for housing development than is necessary.</p> <p>This policy establishes a requirement for the provision of 235 dwellings per annum, with a target of 83% of new dwellings to be built on previously developed land. Paragraph 6.3.20 states that ‘There is no requirement for additional greenfield sites beyond existing planning permissions.’</p>

	<p>To allocate 8.38 years worth of potential countryside development (i.e. the proposed 640 homes) on one planning application would not accord with this policy. (See also the Strategic Housing Land Availability Report below.)</p>
<p>Resource Management Policy 20</p>	<p>Target 20.1 - No net loss of hedgerows through development, 2001-2016.</p> <p>From developer’s Environment Statement:</p> <p>8.4.9 If achievable suitable boundary vegetation should be retained where possible, subject to health and structural condition, to provide a level of screening for adjacent residential properties. The hedgerow towards the eastern edge of the southern boundary should also be retained.</p> <p>8.4.11.3. Boundary features – hedgerow and tree planting</p> <p>The retention of boundary features where achievable would reduce the adverse impact resulting in a negligible residual impact.</p> <p>8.4.11.6. Hedgerow to southern boundary</p> <p>The retention and protection of this would result in no impact occurring.</p> <p>10.4.13 The hedgerows (a ‘medium’ value receptor, important at district/city level) will experience a loss of about 90% loss in the clearance stage, i.e. approximately 2,450 metres of the surveyed 2,750 metres will be removed. This equates to an extensive, high negative impact. The collective assessment indicates this is a significant impact. There is scope for partial mitigation and compensation.</p> <p>According to the developer’s Environmental Statement, there will be a residual loss of approximately 30% of the total hedgerow length, but new planting will be of species-rich hedgerows.</p> <p>If retention was not achievable, as in 8.4.9 and 8.4.11.3, what additional mitigation measure would be implemented? Without this, the impact must be classed as ‘moderate adverse’, at the very least.</p> <p>According to the Proposed Signal Junction Arrangement diagram, submitted by the developer, the creation of an additional traffic lane, for site access from the west, and a 3 metre footpath/cycleway next to Progress Way, shows the removal of all of this vegetation, as the current grass verge is only 4 feet wide. The impact for 8.4.11.6 must also be classed as ‘moderate adverse’.</p> <p>If new hedgerows are planted as property boundaries, there can be no guarantee that they will be retained by the residents.</p> <p>With the current proposal, the potential loss must be estimated at 90%, as stated in paragraph 10.4.13 above.</p> <p>The proposed development does not support this policy.</p>
<p>Policy 21</p>	<p>The natural and man-made heritage assets of Lancashire comprise an important resource of individual sites of ecological, geological, historical and cultural importance and the links between them. They are valuable in themselves and for their contribution towards the education, recreation and economic life of the County.</p>

	<p>The aim of sustainable development is to ensure that the overall quality of the natural and man-made environment is maintained and, where possible, enhanced. The underlying principle of this policy is that, as a minimum, there should be ‘no net loss’ of environmental value arising from any development.</p> <p>The uniqueness of this area has long been realized and has been reflected in the Blackpool Local Plan 2001-2016: ‘Marton Moss is Blackpool’s only remaining substantial area of countryside land, the character of which has been significantly affected by its historical importance as a horticultural area (see Policy NE2). Reflecting its specific character, more restrictive policies exist on the Moss than in typical open countryside areas and new residential development is not permitted other than for agricultural or horticultural purposes.’</p> <p>The proposed development is contrary to this policy.</p>
Policy 24	<p>The whole of the area within the proposed development is within the high flood risk zone, as detailed in this policy. The policy states that:</p> <p>Undeveloped and sparsely developed areas are generally not suitable for residential, commercial and industrial development unless a particular location is essential, e.g. navigation, water-based recreation, agriculture, essential transport and utilities.</p> <p>Functional flood plains are areas of relatively flat land adjacent to a river or sea where excess water flow is held in time of flood. Built development should be wholly exceptional and limited to essential transport and utilities infrastructure that cannot be located elsewhere. However, suitable land uses could include recreation, sport, amenity and conservation uses. Development should be designed to remain operational in times of flood and should not impede flood flows or result in a net loss of floodplain storage.</p> <p>The proposed development will greatly increase the danger of flooding for existing properties which, in turn, will increase the likelihood of property damage.</p> <p>With the expected increase in water levels, the removal of a vast tract of green land that assists in the mitigation of local flooding, will compound the possible flood risk.</p>

	Blackpool Local Plan 2001-2016
LQ2	<p>The design of new development proposals will be considered in relation to the character and setting of the surrounding area.</p> <p>(B) New developments outside these locations (those with townscape character) should:</p> <p>(i) complement the prevailing design character of the surrounding area;</p> <p>The proposed development is for 2, 2.5 and 3 storey houses and 3 and 4 storey flats in an area where only 1 house is 2.5 storeys, many are bungalows and many detached, does not support this policy.</p>
LQ6	<p>Landscape Design and Biodiversity</p> <p>New development will be required to incorporate appropriate landscaping and benefits to biodiversity wherever possible, that:</p> <p>(a) enhances the spaces between and around buildings, including new streets</p> <p>(b) retains existing mature trees, shrubs, hedgerows and other landscape features and species, or habitats of ecological importance, within the site where possible and incorporates them into the overall design.</p> <p>4.27</p> <p>As far as practicable existing mature landscape features and species or habitats of ecological importance should be retained and integrated within the design of the overall scheme. This will help to secure Blackpool's contribution towards meeting Lancashire Structure Plan Target 20.1 of no net loss of hedgerows through development between 2001-2016.</p> <p>Proposals that will lead to unacceptable tree, shrub or hedgerow loss will not be permitted. Where replacement planting is necessary it should aim to introduce species and create habitats which make a positive contribution to local biodiversity. The Council will also protect trees and groups of trees by making Tree Preservation Orders where appropriate. Removal of protected trees will only be allowed in exceptional circumstances, where trees endanger public safety or are diseased, and on condition that replacement planting takes place.</p> <p>According to the developer's Environmental Statement, there will be a residual loss of approximately 30% of the total hedgerow length, but this is dependant on all mitigation measures being implemented.</p> <p>As this is unlikely to happen, as detailed in the comments on Policy 20 of the JLSP above, the proposed development does not support this policy.</p>
HN1	<p>5.11 Over the last 3 years (1998-2001) before the start of the current plan period over half of the new housing development in Blackpool took place on Greenfield sites. Up to 2006 further development will continue on longstanding Greenfield sites on Marton Moss and in north east Blackpool, but increasingly new sites coming forward for development are located on brownfield land. The likelihood of this trend continuing over the plan period was assessed in the Council's 'Urban Potential Study 2004', which evaluated the potential sites and buildings within the Blackpool urban area to accommodate new housing development.</p> <p>The study utilised an approach consistent with the Government guide to better practice set out in 'Tapping the Potential' and followed the methodology set out in the NWRA guidance document: 'Exploring Urban Potential for Housing'. The study concluded that</p>

	<p>the housing requirement could be met by focusing further new housing development on brownfield land.</p> <p>The proposed development is on land designated as countryside and, as such, does not support this policy.</p>
HN6	<p>New housing development will be required to provide an adequate mix of house types and sizes taking into account the local context and the site characteristics.</p> <p>Where a mix is required the Council will permit the provision of no more than 60% of the total number of dwellings to be of:</p> <p>(i) any one house type (i.e. flats/terraces/semi-detached/detached)</p> <p>The accommodation schedule within the proposed development would provide 400 mews dwellings. This equates to 63% of the total number proposed, therefore does not support this policy.</p>
HN8	<p>Policy HN8 therefore seeks to secure a 30% level of provision of affordable housing on all housing schemes over 0.5 hectares, including both low cost housing and social housing for sale or rent.</p> <p>The applicant has a track record of non-delivery in the provision of affordable Housing; non implementation of the consent granted on the former Aegon site on Ballam Road in Lytham, where none of the promised 108 affordable units have materialized and only 12 affordable houses in a development of 260 houses on the combined Cooksons and Sadlers sites, also in Lytham.</p>
BH3	<p>6.19 Development should respect the privacy, outlook and levels of sunlight and daylight received by existing properties and ensure that adequate amenity standards are provided for the occupiers of new properties.</p> <p>The proposed development is for 2, 2.5 and 3 storey houses and 3 and 4 storey flats in an area where only 1 house is 2.5 storeys, many are bungalows and many detached, does not support this policy.</p>
BH10	<p>6.48 Provision should be incorporated in developments at the planning stage having regard to the Council’s approved standards. These are currently set out in Supplementary Planning Guidance on “Open Space provision for new Residential Development” (SPG 11) which reflects the National Playing Fields Association’s standard of 2.4 hectares of formal open space per 1000 population.</p> <p>Proposed village green does not provide the required amount of open space, therefore does not support this policy.</p> <p>The proposal does not meet the requirements of the National Playing Fields Association’s standard for outdoor playing space. In particular it fails to provide adequate LAP’s (Local area for Play) within 100m walking distance of all property and within 5m of the nearest dwelling; LEAP’s (Local Equipped Area for Play) within 400m of all property and within 10m of the nearest dwelling. It also does not appear to provide a NEAP (Neighbourhood Equipped Area for Play with 8 types of play equipment etc) within 1000m walking distance and within 30m of the nearest dwelling.</p>

NE2	<p>Countryside Areas –</p> <p>To retain their existing rural character and prevent peripheral urban expansion the following areas are designated as Countryside Area:</p> <p>2.1 Land at Marton Moss</p> <p>Within the Marton Moss Countryside Area, new development, including the conversion or change of use of existing buildings, will not be permitted except for: (a) agricultural or horticultural purposes (b) outdoor recreational uses appropriate to a rural area. New dwellings will not be permitted unless essential in relation to the agricultural or horticultural use of the land. Infill development and the change of use/conversion of buildings for other uses will not be permitted.</p> <p>8.17 The drainage system on the Moss is only adequate to cater for existing development, together with new development required in connection with agriculture and horticulture use. The public sewers available to deal with foul and surface water drainage from new development have inadequate capacity. The cumulative effect of further new development would have an adverse impact on the ability of the existing drainage system to cater for existing development.</p> <p>8.18 Consistent with the Council’s policy to resist new residential dwellings, extensions to existing buildings will not be permitted that are clearly in conflict with the open character of the designated Countryside Areas and Green Belt.</p> <p>8.19 Modest extensions that relate well to neighbouring developments and are carried out sensitively will be permitted. The Council’s restrictive policies controlling new housing development in the countryside, however, potentially encourages applications for large extensions and replacement dwellings. Proposed developments that by virtue of their scale, design or materials would have an adverse impact on the visual amenities and remaining rural character of the designated Countryside Areas and Green Belt will be resisted. To avoid over large and conspicuous dwellings, no proposals will be permitted exceeding 35% of the original ground floor building footprint.</p> <p>Examples of planning applications that have been refused quoting a detrimental impact on the appearance and character of the Marton Moss countryside area: 07/0464 – refused as contrary to LQ1, LQ4, BH3, AS1 and NE2 of the Blackpool Local Plan 2001 – 2016. 07/0359 - refused as contrary to LQ14, BH3 and NE3 of the Blackpool Local Plan 2001 – 2016. 07/0623 - refused as contrary to NE2, NE3, BH3, AS1 and LQ6 of the Blackpool Local Plan 2001 – 2016. 08/1181 – refused as contrary to NE2, LQ1, LQ2, LQ3, LQ5, LQ6, BH3, BH20 and AS1 of the Blackpool Local Plan 2001 – 2016. Consequently, this proposal should also be refused.</p>
NE6	<p>Protected Species</p> <p>Development will not be permitted if it would have an adverse impact on animal or plant species protected under national or international legislation. Development proposals</p>

	<p>should ensure that species and habitats set out in the UK and Local Biodiversity Action Plans will be protected and where possible enhanced. Where development is permitted, adequate compensatory measures must be undertaken to sustain and enhance the species and its habitat.</p> <p>Having regard to the issues raised by Dr S. Manchester of the LCC Environment Directorate, the proposed development does not support this policy.</p>
NE7	<p>Sites and Features of Landscape, Nature Conservation and Environmental Value</p> <p>The Council will protect and retain sites and features of landscape, nature conservation and environmental value. Particular importance is attached to:</p> <ul style="list-style-type: none"> • Sites within the densely built-up inner areas • Prominent road/railway frontage sites that provide attractive open breaks • Groups of trees and hedgerows that contribute to public amenity and/or are of nature conservation importance • Watercourses • Other habitats listed in the Lancashire Biodiversity Action Plan (BAP) or supporting species listed in the BAP. Development proposals must ensure that these sites and features are protected and where possible enhanced. The Council will identify suitable sites for landscape enhancement and use its powers to promote and encourage their renewal, including maximising benefits for nature conservation using available grant resources. <p>Having regard to the issues raised by Dr S. Manchester of the LCC Environment Directorate, the proposed development does not support this policy.</p>
NE10	<p>8.49 It is essential to ensure that new development will not be liable to or increase the risk of flooding. Government Guidance requires local planning authorities to adopt a risk based sequential approach to proposals for development taking account of the area liable to flooding, its likelihood and extent. In accordance with PPG25 (Development and Flood Risk) applications in areas at risk of flooding should be accompanied by an appropriate flood risk assessment, which complies with Appendix F of PPG25.</p> <p>8.50 The watercourses in Blackpool are incapable of accepting any increase in surface water and it therefore needs to be ensured that any new development is drained in accordance with PPG25 guidance. There have been longstanding drainage constraints on the Moss.</p> <p>The developer has stated that there is no anecdotal evidence of flooding but many local residents can provide firsthand evidence of the existing problems. In fact, the SFRA June 2008, paragraph 14.1, lists 32 reports of flooding and acknowledges that there are many more that have not been included.</p> <p>The proposed development will greatly increase the danger of flooding in this and surrounding areas and, therefore, does not support this policy.</p>
AS1	<p>9.8 This policy establishes the main principles relating to highways, transport and</p>

	<p>parking which will apply to all development. Good accessibility to jobs, services and facilities is fundamental to an effective planning system. The ability to reach a site by different modes of transport and provide genuine choice is an essential factor in considering the suitability of sites for development. This is important for all, but especially for those who do not have regular use of a car and to promote social inclusion.</p> <p>9.9 New development should therefore be concentrated in town and district centres and on other sites which have or will have good access to those centres by a variety of modes (including for, pedestrians, cyclists and users of public transport). Appropriate access and facilities for the mobility impaired (including the visually and hearing impaired) should reflect guidance in the Disability Discrimination Act 1995. The emphasis is on integrating land use, public transport and walking/cycling. Links to nearby existing or proposed pedestrian and cycle routes should be included where such an opportunity exists. In addition each development must have regard to the existing road network and ensure adequate and safe access onto the classified road system.</p>
AS2	<p>New developments which would generate significant levels of travel will only be permitted in locations which have good access to the existing main highway network and which are well served by sustainable modes of transport.</p> <p>Measurements taken and detailed on the Accessibility statement at Appendix, show that the site is not well served by sustainable modes of transport.</p> <p>Proposed public transport access to the site, that the developer has now agreed to, has not been detailed in the proposal and may require the compulsory purchase of gardens along Moss House Road.</p> <p>In addition, access to and from site on to Progress Way will pose safety issues unless the speed limit on Progress Way is reduced.</p> <p>Therefore, the proposed development does not support policies AS1 and AS2.</p>

	Government Guidance
PPS1 Climate Change	<p>23. In deciding which areas and sites are suitable, and for what type and intensity of development, planning authorities should assess their consistency with the policies in this PPS.</p> <p>24. In doing so, planning authorities should take into account:</p> <ul style="list-style-type: none"> – the extent to which existing or planned opportunities for decentralised and renewable or low-carbon energy could contribute to the energy supply of development; – whether there is, or the potential for, a realistic choice of access by means other than the private car and for opportunities to service the site through sustainable transport; – the capacity of existing and potential infrastructure (including for water supply, sewage and sewerage, waste management and community infrastructure such as schools and hospitals) to service the site or area in ways consistent with cutting carbon dioxide emissions and successfully adapting to likely changes in the local climate; – the ability to build and sustain socially cohesive communities with appropriate community infrastructure, having regard to the full range of local impacts that could arise as a result of likely changes to the climate; – the effect of development on biodiversity and its capacity to adapt to likely changes in the climate; – the contribution to be made from existing and new opportunities for open space and green infrastructure to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity; and – known physical and environmental constraints on the development of land such as sea level rises, flood risk and stability, and take a precautionary approach to increases in risk that could arise as a result of likely changes to the climate. <p>The proposed development :</p> <ul style="list-style-type: none"> • Does not appear to have supplied any evidence to show that these homes will meet the necessary reductions in carbon emissions, i.e. 44% reduction in emissions by 2013 and carbon neutral for those built after 2016; • Is not easily accessible as shown by the Accessibility Statement, Appendix A, and provision of public transport through the site, which has yet to be decided, could necessitate the loss of existing gardens; • Will require major new infrastructure, thus increasing emissions; • Will have a drastically reduce the existing biodiversity in the area; • Will cause the loss of 17 hectares of land which currently acts as a major ‘carbon sink’, which is currently helping to offset carbon emissions. • Will increase the risk of flooding and structural instability for existing properties; <p>therefore does not support this policy.</p>
PPS1 Sustainable development	<p>Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:</p> <ul style="list-style-type: none"> – making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life; – contributing to sustainable economic development; – protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;

	<p>– ensuring high quality development through good and inclusive design, and the efficient use of resources; and, – ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.</p> <p>The proposed development:</p> <ul style="list-style-type: none"> • Will not contribute to sustainable economic development as it will not provide any permanent employment; in may, in fact, lead to a fall in employment for those currently using the land; • Will have a devastating effect on the local ecology; • Does not meet the required mix of housing, as 63% will be mews buildings; • Will destroy the existing community, has no provision for the building of any new community facilities, does not have good access to employment and services; <p>therefore does not support this policy.</p>
PPS3	<p>PPS3 requires that to be considered deliverable, sites should:</p> <ul style="list-style-type: none"> - Be Available – the site is available now. - Be Suitable – offering a suitable location for development now. - Be Achievable – with a reasonable prospect that housing will be delivered on the site within five years. <p>The site is not currently available as the developer does not own, or have options, on all of the land within the application site.</p> <p>It is not developable without significant investment in the highway infrastructure and drainage system, as detailed in the United Utilities response of 17 November 2008. This states that:</p> <ul style="list-style-type: none"> • United Utilities will not accept any connections into the public sewer for treatment at Fleetwood WwTW until November 2010 when the current project to upgrade Fleetwood WwTW will be completed. • We would ask that surface water be directed eastwards and northwards towards the River Wyre for discharge. This may require the consent of the Environment Agency. • That measures have been taken to prevent flooding of properties – which must include existing properties. • The site of the proposed development should be carefully checked to ascertain if any sewers or drains cross the area. If any such pipes exist these may require diversion or protection before the development commences. <p>The potential for imminent development is even further reduced by the applicant’s own description of the “cataclysmic trading conditions” they are currently encountering, as specified in the supporting statement submitted in their planning application to build 1150 properties on land south of Queensway.</p>
Paragraph 16	<p>16. Matters to consider when assessing design quality include the extent to which the proposed development:</p> <ul style="list-style-type: none"> – Is easily accessible and well-connected to public transport and community facilities

	<p>and services, and is well laid out so that all the space is used efficiently, is safe, accessible and user-friendly.</p> <ul style="list-style-type: none"> – Provides, or enables good access to, community and green and open amenity and recreational space (including play space) as well as private outdoor space such as residential gardens, patios and balconies. – Is well integrated with, and complements, the neighbouring buildings and the local area more generally in terms of scale, density, layout and access. – Facilitates the efficient use of resources, during construction and in use, and seeks to adapt to and reduce the impact of, and on, climate change. – Takes a design-led approach to the provision of car-parking space that is well-integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly. – Creates, or enhances, a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity. – Provides for the retention or re-establishment of the biodiversity within residential environments. <p>The proposed development :</p> <ul style="list-style-type: none"> • Is not easily accessible to local facilities or employment (see appendix A); • Will remove green space that is currently well used. The application is for change of use and highway access only therefore the layout is only indicative and may have much less green space than shown; • Will not complement the existing buildings, only one of which is 2.5 storey, with the creation of a high density housing estate that will include 3 and 4 storey flats overlooking bungalows; • Will greatly increase carbon emissions, as well as destroying a 17 hectare ‘carbon sink’; • Will eradicate the existing character of the area; • Will have devastating effects on the existing ecology and reduce the biodiversity of the area, (as detailed in the response from Dr Sarah Manchester of the LCC Environment Directorate).
<p>Paragraphs 46 and 47</p>	<p>46 - Local Planning Authorities should develop housing density policies having regard to:</p> <ul style="list-style-type: none"> – The spatial vision and strategy for housing development in their area, including the level of housing demand and need and the availability of suitable land in the area. – The current and future level and capacity of infrastructure, services and facilities such as public and private amenity space, in particular green and open space. – The desirability of using land efficiently and reducing, and adapting to, the impacts of climate change. – The current and future levels of accessibility, particularly public transport accessibility. – The characteristics of the area, including the current and proposed mix of uses. – The desirability of achieving high quality, well-designed housing having regard to the considerations in paragraph 16. <p>Reflecting the above, Local Planning Authorities may wish to set out a range of densities across the plan area rather than one broad density range although 30 dwellings per hectare (dph) net should be used as a national indicative minimum to guide policy development and decision-making, until local density policies are in place. Where Local Planning Authorities wish to plan for, or agree to, densities below this minimum, this</p>

	<p>will need to be justified, having regard to paragraph 46.</p> <p>The density proposed for this development cannot be supported by the existing infrastructure, neither is it in keeping with the existing characteristics of the area, and should be refused.</p>
PPS9	<p>PPS9 states that: “‘The aim of planning decisions should be to prevent harm to biodiversity’” and that “‘where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that development cannot reasonably be located on any alternative sites that would result in less or no harm.’” It adds “‘If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.’”</p> <p>The information submitted by the developer does not support the assertion that they have satisfied these principles by incorporating biodiversity within the development, as detailed in the response from Dr S. Manchester of the LCC Environment Directorate.</p>
PPS13	<p>The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:</p> <ol style="list-style-type: none"> 1. promote more sustainable transport choices for both people and for moving freight; 2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and 3. reduce the need to travel, especially by car. <p>As shown in the Accessibility Statement, Appendix A, the proposed development will, in fact, considerably increase the use of private transport in the area, and does not support this policy.</p>
PPG17	<p>10. Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements.</p> <p>11. Open space and sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in plans. Areas of particular quality may include:</p> <ol style="list-style-type: none"> iii. areas of open space that particularly benefit wildlife and biodiversity. <p>17. Local authorities should:</p> <ol style="list-style-type: none"> i. avoid any erosion of recreational function and maintain or enhance the character of open spaces; ii. ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment; iii. protect and enhance those parts of the rights of way network that might benefit open space; and iv. consider the impact of any development on biodiversity and nature conservation. <p>25. The countryside around towns provides a valuable resource for the provision of sport and recreation, particularly in situations where there is an absence of land in urban areas</p>

	<p>to meet provision. Subject to paragraphs 27-30 below, local authorities should encourage the creation of sports and recreational facilities in such areas and the development of areas of managed countryside, such as country parks, community forests, and agricultural showgrounds. Where planning permission is to be granted for such land uses, local planning authorities should ensure that facilities are accessible by walking, cycling and public transport as alternatives to the use of the car.</p> <p>One of the many functions defined as ‘open space’ by PPG17 is:</p> <p>vi. as a visual amenity: even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape.</p> <p>The proposed development will cover 17 hectares of open space currently enjoyed by the local community, which is contrary to this policy. The area would be better used for allotments, parkland, a nature reserve or even new family orientated tourist facilities.</p>
PPS23	<p>2. This Statement advises that:</p> <ul style="list-style-type: none"> – any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to impacts on health, is capable of being a material planning consideration, in so far as it arises or may arise from or may affect any land use; <p>5. The strategy sets out ten principles and approaches. The following are particularly relevant to the consideration of planning and pollution control:</p> <ul style="list-style-type: none"> – putting people at the centre; – taking a long-term perspective; – taking account of costs and benefits; – respecting environmental limits; – applying the precautionary principle; – using scientific knowledge; – following procedures which are based on transparency, access to information, effective participation by stakeholders and access to justice; and – making the polluter pay. <p>6. The Government is committed to using the precautionary principle, which was included in the 1992 <i>Rio Declaration on Environment and Development</i>³. This states that, “<i>where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation</i>”. As was made clear in <i>A Better Quality of Life – A Strategy for Sustainable Development for the UK</i>, precaution is not just relevant to environmental damage, but is relevant also in the fields of health and safety. The Interdepartmental Liaison Group on Risk Assessment (ILGRA), in its 2002 paper <i>The Precautionary Principle: Policy and Application</i>⁴, made a number of important points including noting that the:</p> <ul style="list-style-type: none"> – precautionary principle should be invoked when: – there is good reason to believe that harmful effects may occur to human, animal or plant health, or to the environment; and – the level of scientific uncertainty about the consequences or likelihood of the risk is such that best available scientific advice cannot assess the risk with sufficient confidence to inform decision-making.

The following matters may be material in the consideration of individual planning applications where pollution considerations arise:

- the possible impact of potentially polluting development (both direct and indirect) on land use, including effects on health, the natural environment or general amenity;
- the possibility that (whether or not some aspects of the development are subject to pollution control), emissions of smoke, fumes, gases, dust, steam, smell, vibration or noise from the development might nevertheless be seriously detrimental to amenity in addition to constituting a statutory nuisance under Part III of the Environmental Protection Act 1990;
- the objective perception of unacceptable risk to the health or safety of the public arising from the development; and
- the need to limit and, where possible, reduce the adverse impact of light pollution, e.g. on local amenity, rural tranquility and nature conservation.

The Air Quality Assessment provided by the developers states:

5.1.1 There are residential properties located within 10m of the proposed site boundary in all compass directions, as indicated graphically in Appendix 3 Figure 3. By taking into account the distance from the proposed site boundary, the unmitigated magnitude of potential dust impacts is predicted to be *substantial* at these receptors of *high* sensitivity. The unmitigated impact significance is considered to be *major to intermediate* in scale and *adverse, short-term* and *reversible* in nature, in accordance with the assessment methodology outlined in Section 3.

5.5 Potential Residual Environmental Effects

5.5.1 Construction Phase

Provided that good practice measures are implemented, potential air quality impacts during the construction phase of the scheme are predicted to be *major, adverse to neutral*. It should be noted that the predicted impacts during the construction phase will be *short-term* and *reversible* at receptors of *very high* and *high* sensitivity.

5.5.2 Operational Phase

Potential residual impacts associated with the operational phase of the proposed development are predicted to be *adverse to neutral*. It should be noted that the predicted impacts during the construction phase will be *long-term* and *reversible* at receptors of *very high* and *high* sensitivity.

Although the assessment states that the impact during construction is defined as short-term, the proposed development will take approximately 7 years. The impact for those surrounding residential properties will, therefore, be long-term.

It is also somewhat disingenuous of the authors of the report to imply that all existing residential properties are on the edge of the site, when they are, in fact, surrounded on all 4 sides by the proposed development.

In addition, the authors of the Air Quality Assessment admit that due to a lack of information on the relevant data, their confidence in their predictions for the following are low:

	<p>5.1.1, airborne dust and particulate emissions 5.1.2 Generation of Exhaust Emissions by Construction Plant on Site, 5.1.4 Release of VOCs from Stored Fuels and Chemicals, 5.2.1 Emissions Associated with the Provision of Heat and Power(within the new buildings); therefore the precautionary principle should be considered.</p> <p>Trees breaks and the vegetation along Progress Way were planted in mitigation for the increased noise pollution and CO2 emissions resulting from the new road. The proposed development will see the removal of these, further increasing emissions in this area.</p>
PPS25	<p>5. The aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.</p> <p>7 • where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, LPAs should consider whether there are opportunities in the preparation of LDDs to facilitate the relocation of development, including housing to more sustainable locations at less risk from flooding;</p> <p>9. A risk-based approach should be adopted at all levels of planning. Applying the source-pathway-receptor model to planning for development in areas of flood risk requires:</p> <ul style="list-style-type: none"> • a strategic approach through policies in RSSs and LDDs which avoid adding to the causes or “sources” of flood risk, by such means as avoiding inappropriate development in flood risk areas and minimising run-off from new development onto adjacent and other downstream property, and into the river systems; • managing flood “pathways” to reduce the likelihood of floodingand of the likely routes and storage of floodwater, and its influence on flood risk downstream; and • reducing the adverse consequences of flooding on the “receptors” (ie people, property, infrastructure, habitats and statutory sites) by avoiding inappropriate development in areas at risk of flooding. <p>16. LPAs allocating land in LDDs for development should apply the Sequential Test to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. A sequential approach should be used in areas known to be at risk from other forms of flooding.</p> <p>22. Landowners have the primary responsibility for safeguarding their land and other property against natural hazards such as flooding. Those proposing development are responsible for:</p> <ul style="list-style-type: none"> • providing a FRA demonstrating: <ul style="list-style-type: none"> – whether any proposed development is likely to be affected by current or future flooding from any source; – satisfying the LPA that the development is safe and where possible reduces flood risk overall; – whether it will increase flood risk elsewhere; and

– the measures proposed to deal with these effects and risks. **Any necessary flood risk management measures should be sufficiently funded to ensure that the site can be developed and occupied safely throughout its proposed lifetime;**

- identifying opportunities to reduce flood risk, enhance biodiversity and amenity, protect the historic environment and seek collective solutions to managing flood risk.

The application fails to adequately demonstrate compliance with PPS25 and show details of how these flood risks will be managed. Neither does it detail the funding that will be provided for flood risk management for the lifetime of the proposed site.

In addition, the developer does not seem to have taken into consideration the fact that the existing properties on Moss House Road and Common Edge Road are below 4.5 metres AOD, some even below the DEFRA estimated flood risk level of 4.15 metres. Many of these properties already experience flooding. New properties built at a height of at least 4.75 metres AOD will greatly increase the flood risk for their lower neighbours.

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Paragraph 4.9	<p>For the period 2008 to 2025, Blackpool’s net adjusted requirement over this is 8325. The shortfall in supply therefore equates to 4961 dwellings. Over 13 years this equates to 381.6 per annum. If 80% of new properties are to be developed on brownfield sites, as required by PPS3, then only 76.3 properties should be developed in countryside areas or Greenfield sites in any one year.</p> <p>To allocate 8.38 years worth of potential countryside development (i.e. the proposed 640 homes) on one planning application would not accord with Policy 12 of the JLSP which states:</p> <p>‘However, where the annual housing provision for a particular year or phase is exceeded, possibly because of higher than expected windfall developments, or sooner than anticipated implementation of housing approvals, a consequential adjustment will need to be made to the annual provision to be met in subsequent years. The fundamental aim in releasing sites, as PPG3 explains, should be to ensure that no more land is used for housing development than is necessary.’</p>
Paragraphs 5.6 & 5.7	<p>The need for the comprehensive and coordinated planning of any major suburban extension to Blackpool, together with land acquisition/site assembly and infrastructure provision issues mean only limited new housing development could come forward from any new strategic development locations before 2013.</p> <p>5.7 The Core Strategy will seek to determine a realistic and phased delivery of new housing development on all sites across Blackpool – the impact of which will be to reduce annual housing requirements in the early part of the plan period to 2013. Rather than the pro-rata requirement of 490 dwellings per annum, a figure of around 300 dwellings per annum, much more in line with the identified capacity and with past completions, is considered realistic and achievable. In these terms, it is concluded that the majority of the outstanding NWRSS requirement will be delivered in the latter stages of the plan period.</p> <p>Although a council meeting on 23rd January determined that the Core Strategy would include development within the Marton Moss area, until the ‘Core Strategy’ and the Local Development Framework are adopted, any development within this area would be premature.</p>

Housing Monitoring Report 2007	
Paragraph 3.8	<p>Targets for Previously developed land:</p> <p><u>National Target</u> - 60% of additional housing should be provided on previously developed land and through conversions of existing buildings.</p> <p><u>Regional Target</u> - In the Fylde Peninsula at least 65% of new housing will be built on previously developed land, as recommended in the Panel Report into the NWRSS.</p> <p><u>Joint Lancashire Structure Plan Target</u> - At least 80% of new dwellings in Blackpool to be on previously developed land including re-use or conversion of buildings, 2001-2016.</p> <p><u>Local Plan Targets</u> –</p> <ul style="list-style-type: none"> • 60% of new homes to be on previously-developed land between 2001 and 2006 (based on rolling 3 year average); • 66% of new homes on previously developed land to be new build (3 year rolling average); • At least 80% of new dwellings in Blackpool to be on previously developed land, including conversions of buildings, 2001-2016 <p>The proposed development will not support these targets.</p>

Blackpool Nature Conservation Statement	
Paragraph 2.53	<p>Any potential development planned for Countryside Areas would require a full assessment of the nature conservation value of these lands. As well as any landscape or botanical interests need would be to have regard to establish the presence of not Great Crested Newts, bats, butterflies or other protected species on any of these lands. Great Crested Newts are known to occur within 1 km of the Marton Moss Area.</p> <p>An update paper on Marton Moss is due to be completed in Summer 2008 as part of the production of the Core Strategy.</p> <p>Has a revised Conservation Statement been compiled and available? Was it taken into consideration when the Core Strategy was decided and will it have an impact on this development?</p>
Paragraph 2.6	<p>2.6 Other Sites of Local Nature and Conservation Value</p> <p>Blackpool’s intensely built-up urban area means much of the remaining open land has important landscape, nature conservation and environmental value and increases the importance of optimizing the amenity value of remaining undeveloped land. Substantial development proposals or any proposals affecting prominent or sensitive sites should have regard to their landscape character and include an assessment of their potential impact on the open and urban landscape.</p> <p>A large amount of open land is protected from development by other policies of the Local Plan, including public open space, sites of nature and conservation value, Green Belt and Countryside Areas.</p> <p>This statement supports Policy NE2 of the Blackpool Plan, which is not supported by the proposed development.</p>

Fylde Coast Strategic Housing Market Assessment

At 31/3/07 there were 4720 households on the Blackpool housing waiting list, 1310 of who were classed as in 'current need'.

It is expected that 260 new households will require affordable housing, together with 210 existing households expected to fall into 'housing need', each year.

In addition, here has been a 5% increase in the total number of housing benefit claimants in Blackpool, which is consistent with the movement in the numbers of households on the waiting lists within the authority and declining affordability.

Also, the largest population inflow into Blackpool was of one person households (excluding pensioners).

Due to the small size of the social rented sector, the private rented sector will continue to provide an important alternative to owner occupation, but it is essential that the overall quality is improved to stem demand from economically inactive migrants and support economic regeneration through attracting and retaining working households and creating a more attractive physical environment. The density of the urban form will mean that central areas continue to offer smaller housing stock (apartment and terraced properties) the key will be to uplift quality.

The 2001 census shows that there were 3040 empty properties, 4.5% of the total number of dwelling. According to the Private Sector stock Condition Survey 2007, Blackpool has a higher percentage of unoccupied dwellings (4.7%) than the North West average (4.2%) and the national average (3.0%). Of these, 1450 are classed as long term vacant, i.e. have been empty for more than 6 months. This is 2.4% of the private sector stock and is well above the national average of 1.5%.

If there is said to be any need for additional housing in Blackpool, the population trends show it to be for social housing and good quality privately rented accommodation.

Development of these empty properties and also those which might be viewed as 'first time buyer properties' by local authorities and housing associations would:

- **Generate movement in the housing market;**
- **Provide needed social housing;**
- **Provide local employment;**
- **Assist with the regeneration of the inner town;**
- **Remove the need for this development, as no social housing has been included.**

	SFRA June 2008 SEE PPR25 COMMENTS
Paragraph 18.4	<p>States that ‘In the future, any potential strategic level of new housing or other development on the Moss will require a new separate system of drainage to be implemented in accordance with PPS25 requirements, seeking to minimize surface water run-off through Sustainable Drainage Systems.</p> <p>The way forward would depend on how much land, if any, was to be developed in the long term. A new Drainage Area Plan (DAP) would need to be produced for the whole of the Moss and any developer would be required to submit detailed proposals to both the Council and United Utilities, setting out the potential increased main drainage requirements and taking into account the shorter and longer term proposals for the future of the Moss.’</p> <p>‘Residual risk of breach of sea defences and its higher susceptibility to storm water flooding should be considered for this site.’</p> <p>To date, this plan has not been produced.</p>
Paragraph 22.2	<p>States that the following measure should be taken:</p> <ul style="list-style-type: none"> • Provide site-specific mitigation measures. Any new development within Zones 2 and 3 areas will require raising of development to acceptable ground levels and properties to be flood proofed against low levels of flooding. • Provide sufficient warning and information to people at risk to allow them to take appropriate action. • Provide sufficient planned emergency response and evacuation. <p>Site-specific flood risk assessments should also be considered for sites where its development has the potential to increase the flooding risk to adjacent areas.</p> <p>The proposal makes no mention of flood proofing existing properties or of warning provisions.</p>
Paragraph 22.3	<p>States that:</p> <p>In common with Site A there are some areas within this site that are at a higher risk of flooding. For all developments within the site the following measures should be considered:</p> <ul style="list-style-type: none"> • Modelling should be undertaken to inform a site-specific flood risk assessment for any development. The model must demonstrate that developments would not increase the risk of flooding to existing properties. • Any development within those parts of this site within the Zone 2 area on the Environment Agency Flood Map should be subject to consideration given to the appropriate raising of threshold levels and flood proofing against low levels of flooding. <p>The proposal makes no mention of flood proofing existing properties.</p>

	Noted inaccuracies with the development proposal
	Several inaccuracies have been identified within the numerous documents supplied in support of this application, some of which are listed below. These must bring into question the validity of other data also supplied, if it has not been independently verified.
References to PPS7	The developer's Environmental Statement makes references to PPS7 (5.4.7, 5.7.1.1 and 5.7.1.3) This policy details the principles that local authorities should adhere to when considering development in rural areas and has little or no relevance to the proposed development.
References to PPS22	The developer's Environmental Statement makes references to PPS22 (5.4.12 and 5.7.1) This policy details the principles that local authorities should adhere to when considering the development of renewable energy sources, i.e. wind farms. It has no relevance to housing developments.
Land heights	<p>The development proposal states: '8.3.5 The site itself is located at approximately 6 metres above sea level and is flat.', and repeats this again in paragraph 8.6.4. In paragraph 9.8.1 it is stated that: 'The general level of the site is in the order of 4.30 m AOD.' In paragraph 14.3.1 it is stated that: 'The area is generally flat and lies at approximately 5-10m AOD (Ordnance Survey 1991).'</p> <p>The Ordnance Survey map submitted by the developers shows that NO land within this site is above 5.5 metres above sea level. Approximately 97% is below 4.5 metres with more than a third being less than 4 metres, falling to 3.35 at one point. Much of this land is obviously well below the DEFRA estimated flood risk level of 4.15 metres.</p> <p>If any elements within the proposal, e.g. drainage, flood prevention, have been formulated on the assumption that the land height is in the region of 6 metres, they will be incorrect.</p>
Ecology	<p>Paragraph 8.4.2 states</p> <p>4. Highway planting adjacent to Progress Way The majority of this vegetation is located outside the proposed development site. The removal of this vegetation was considered. However after the undertaking of the initial part of this assessment it is proposed that the majority of it would be retained, with the exception of that removed to provide a new access junction for the site. Part of this vegetation does extend into the proposed site, the removal of most of this is included within the proposals.</p> <p>The retention of this planting was reiterated in a response from Professor Raymond Gemmell. However, the Proposed Signal Junction Arrangement diagram, submitted by the developer, clearly shows the creation of an additional traffic lane, for site access from the west, and a 3 metre footpath/cycleway next to Progress Way. This shows the removal of all of this vegetation, as the current grass verge is only 4 feet wide.</p>

Again, if ecological statements have been made based on the assumption that the vegetation is to be retained, they will be incorrect.

Appendix A

Accessibility Questionnaire response

		<u>Kensington score</u>	<u>Our score</u>
Walking distances	Nearest bus stop	3	3
	Railway station	0	0
	Primary school	3	3
	Food shop	0	0
Cycling distances	Defined route	1	Route 62 runs along Prom to N and Clifton Drive to S. Is > 1 km so may be 0.
	Secondary school	1	It is 1066m so should be 0.
	Town centre	0	0
	Employment	2	2
Public transport	Bus frequency	5	14 is 20 mins 10 is 60 mins 16 is 30 mins. Should be 3.
	Train frequency	3	6.46, 7.46, 8.48 then hourly. Should be 1, hourly or more.
Other services	GP, PO, Library, Bank Pub	1	Only 2, PO is 1653m, so should be 0.
	Play area	3	Outline planning so proposed park/play area may not exist or have any facilities. So may be less.
	Totals	22	16 or less

(Bollards in centre of Moss House Road taken as centre of application site for all measurements.)