

# Morgan and Morecambe Offshore Wind Farms Transmission Assets

Local Impact Report

Blackpool Borough Council



May 2025

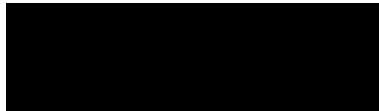
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## 1.0 INTRODUCTION

### 1.1 Terms of Reference

- 1.1.1 Blackpool Borough Council (**'BBC'**) is a statutory consultee for Nationally Significant Infrastructure Projects (**'NSIPs'**) which incorporate works within or neighbouring its administrative area. BBC is a unitary authority and therefore participates in this Examination in accordance with its statutory responsibilities towards its residents and businesses, and as Local Flood Authority, Local Highways Authority and Local Planning Authority.
- 1.1.2 This report comprises the Local Impact Report (**'LIR'**) of BBC as it is a host and neighbouring authority for the Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (the **'Applicants'**) scheme to construct, operate and decommission two electrically separate transmission systems connecting to the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets (**'the Scheme'**).
- 1.1.3 This LIR will provide the Examining Authority (**'ExA'**) with BBC's understanding of the site, surrounding area, relevant local issues, planning policies and how the Scheme positively and adversely impacts this context. As per the guidance provided within the Planning Inspectorate's 'Advice note one: Local Impact Reports', this statement will set out both matters of agreement and disagreement but will not make a planning judgement on these matters. Relevant officers have reviewed the proposals submitted by the Applicants having also taken into account representations made by other parties.
- 1.1.4 The review of these impacts will highlight the key issues arising from the Scheme, the relative importance of these impacts and the extent to which the Applicant's draft DCO (**'dDCO'**) adequately addresses them. The review supports the identification of additional requirements, appropriate changes and improvements to the proposals before the ExA makes its recommendations to the Secretary of State.
- 1.1.5 This LIR has been prepared in accordance with S60(3) of the Planning Act 2008 (as amended) and having regard to the guidance within the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' guide and the MHCLG guidance 'Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects'.

## 2.0 THE SCHEME CONTEXT

### 2.1 Description of the Area

- 2.1.1 The Scheme makes landfall to the north of Lytham St. Annes near Blackpool Airport. The connection route then travels in a broadly easterly direction to connect to the existing National Grid substation in Penwortham, south of Preston. The majority of the connection route falls outside the BBC administrative area. The landfall area and start of the Transmission Assets cable route (and associated infrastructure) are of most relevance to BBC.
- 2.1.2 As Host and Neighbouring authority, the works plan indicates that the Scheme will directly impact a portion of land within and controlled by BBC, at the junction of Squires Gate Lane (A5230) and New South Promenade (A584) (known locally as Starr Gate) and the existing junction access to Blackpool Airport from Squires Gate Lane (A5230). The Starr Gate access road, running westwards onto the beach, is also a Council maintained route. Squires Gate Lane lies partially within Blackpool Borough Council's boundary and partly within Fylde, the access point from Squires Gate Lane southwards into Blackpool Airport lies within Fylde but is subject to a cross-boundary agreement administered by Blackpool Borough Council, with Blackpool Airport a wholly owned Blackpool Borough Council asset. The A5230 (Squires Gate Lane) is a main arterial route within South Blackpool linking the M55, to the east, and the Promenade in the west. Residential development sits to the north of Squires Gate Lane, alongside local facilities and services, such as pharmacies, post office, schools and retail offerings.
- 2.1.3 There are pockets of residential development on the south side of Squires Gate Lane towards the Promenade. This area is predominantly comprised of commercial development along the road frontage and Amy Johnson Way, forming the Blackpool Retail Park and Squires Gate Business Park. Blackpool Airport lies beyond this with the majority lying within the green belt which separates the urban areas of Blackpool and Lytham St. Annes. This pattern of development reflects the strategic vision for this location, along the Blackpool – Fylde periphery, which is of sub-regional importance in employment terms.
- 2.1.4 In November 2015, Enterprise Zone status was approved for the wider Airport site, coming into force from April 2016 and valid for a period of 25 years. It was envisaged that, over time, the Enterprise Zone status will attract over 280 no. new businesses and create circa. 5,000 no. new jobs over its lifespan. Blackpool Borough Council is the major freehold landowner at the Airport and Enterprise Zone following the purchase of the Airport in September 2017 and the sole owner of the Airport's operational and land holding companies. Blackpool Council is the designated accountable body for the delivery of the Enterprise Zone and purchased the Airport in 2017, to assist in its promotion and delivery.

- 2.1.5 The dunes and golf course where the Scheme first makes landfall (both of which are located within Fylde Borough Council's boundary) include land which is subject to a range of national and local biodiversity protections, including the Ribble & Alt Estuaries SSSI, SPA and Ramsar sites, Lytham and St Annes Dunes SSSI and Starr Hills Local Nature Reserve.
- 2.1.6 The Starr Gate accessway which leads onto the beach from Squires Gate Lane, is also owned, managed and maintained by BBC. The accessway is a partially private road which provides vital access to BBC facilities and tenants, the Starr Gate Tram Depot and the Light Craft Club, emergency services including the RNLI and HM Coastguard, beach access for passive and active users and festive activities, as well as being the landfall point for the transatlantic subsea fibre optic cable 'CeltixConnect-2 (CC-2)' (owned by EXA Infrastructure) and other utilities. This internet cable transports up to one third of the world's internet traffic between Blackpool and New York in less than 64 milliseconds.

## 2.2 Planning History

- 2.2.1 Planning application history relevant to this submission, on land associated with the transmission connections route within or adjoining Blackpool, is set out below.

### 24/0478 (Fylde Borough Council)

Request for screening opinion pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of the proposed installation of a 20.1 megawatts-peak solar farm together with ancillary equipment and infrastructure at Blackpool Airport. This application was submitted to Fylde Borough Council on 16<sup>th</sup> August 2024 and is awaiting formal determination. The application site is partly owned by Blackpool Airport (who is in the ownership of Blackpool Borough Council) and partly by Blackpool Borough Council itself.

### 25/0006 (Fylde Borough Council)

Application to vary condition 2 (approved plans) of planning permission 24/0435 for 'demolition of existing vehicle search point (VSP) and admin office buildings and erection of replacement single storey VSP and administrative facilities building with associated infrastructure including 60 space car park and new secure fencing and access gates up to 2.2 metres in height to site perimeter'. This application was validated by Fylde Borough Council on 07<sup>th</sup> January 2025 and approved on 11<sup>th</sup> February 2025. A subsequent application is awaiting validation by Fylde Borough Council in respect of reorientating the approved building. The application site is owned by Blackpool Airport (who is in the ownership of Blackpool Borough Council).



23/0589 (Fylde Borough Council)

Hybrid planning application relating to Enterprise Zone development consisting of a full application for the construction of new access roads, existing highways improvement works and drainage works; and outline planning application for the construction of 4 no. hangars, a commercial unit (Class B2 / E(G)) and car parking, alongside associated infrastructure works with access applied for and all other matters reserved. This application was granted approval by Fylde Borough Council on 12th May 2025. The application site is located on land known as Blackpool Airport and in the ultimate ownership of BBC.

- 2.2.2 The latter two applications present the first stage of works relevant to the coined 'Silicon Sands' area of the Blackpool Airport Enterprise Zone, which seeks to relocate airport related facilities closer to the airport runways enabling land to the north, fronting Squires Gate Lane, to be appropriately redeveloped for commercial use. Silicon Sands will be a digital-led campus for high performance companies to be anchored by a series of green data centres powered by renewable energy. It is intended that the proposed solar farm project (subject to the above screening opinion request) would facilitate this.
- 2.2.3 The Scheme has the potential to impact upon the ability to bring forward the development set out above in a timely and complete manner.

### 2.3 Need for the Scheme

- 2.3.1 The national and local benefits that the Scheme may deliver is recognised by BBC, which are considered to include:
- Promoting clean and renewable energy
  - Reducing reliance on fossil fuels
  - Creating jobs and boosting economic growth
  - Contributing to environmental sustainability by reducing greenhouse gas emissions
  - Lowering air pollution
  - Providing security of supply
  - Facilitating cable access to two offshore wind farm applications
- 2.3.2 Since the Kyoto Protocol came into effect in 2005, it is widely accepted that greenhouse gas emissions need to be significantly reduced and there is a need for international action. As such, the UK and others have committed to reducing greenhouse gas emissions. In 2019, the UK government declared a climate emergency following publication of the Committee on Climate Change report titled 'Net Zero – The UK's Contribution to Stopping Global Warming'. In so doing, the government announced its commitment to achieve net zero by 2050.

- 2.3.3 In 2019, BBC also declared a climate emergency and committed to achieving net zero carbon emissions and using 100% clean energy by 2030. It is intended for this goal to assist in protecting the health, wellbeing and livelihoods of the community through the rapid reduction of greenhouse gas emissions and adaptation to reflect the changing climate. As such, the Council are wholly aligned with the government's position and are in support of the outcomes of the scheme as a whole.
- 2.3.4 Whilst BBC are supportive of the outputs of the Scheme, following a thorough review of the application documents submitted with the dDCO, BBC do have concerns about matters raised within this LIR, which require further consideration by the Applicants and resolution during the Examination.

## 3.0 PLANNING POLICIES

### 3.1 Introduction

- 3.1.1 As the Scheme is a NSIP, the National Planning Policy Framework (**'NPPF'**) has the status of a material consideration in planning terms. Therefore, relevant paragraphs of the NPPF are set out within this chapter. It is noted that the NPPF has been revised after the Scheme was submitted for examination.
- 3.1.2 The relevant Development Plan documents at local level covering the Scheme are also introduced below. Relevant policies are listed, consisting of those set out within the Applicant's Planning Statement (document reference J28) where relevant to Blackpool, alongside any others considered of relevance by BBC as a Host Authority.

### 3.2 National Policy Statements

- 3.2.1 When considering NSIP proposals under the Planning Act 2008, the relevant Secretary of State must have regard to any national policy statement (**'NPS'**) which has effect in relation to the proposed development S104(2)(a). The relevant NPSs are set out below:
- 3.2.2 National Policy Statement for Energy (EN-1): The overarching national policy statement for energy. Published in November 2023 (and in force from January 2024), EN-1 sets out the government's commitment to increasing renewable energy generation capacity and recognises that, in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.
- 3.2.3 National Policy Statement for renewable energy infrastructure (EN-3): EN-3, together with EN-1, provides the primary policy direction for the assessment of applications for nationally significant renewable energy infrastructure, including the offshore transmission infrastructure (such as interconnectors, or Multi-Purpose Interconnectors) in English waters.
- 3.2.4 National Policy Statement for electricity networks infrastructure (EN-5): EN-5 sets out the general principles that should be applied in the assessment of development consent applications for network infrastructure, such as transmission cables. The Policy applies not only to transmission infrastructure, but also associated infrastructure such as substations and converter stations.
- 3.2.5 Paragraph 4.1.5 of EN1 states that, "In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:
- its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits:

- its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.”

3.2.6 EN-1 continues to state that the Secretary of State may consider as important and relevant to their decision-making Development Plan documents or other documents in the Local Development Framework. Therefore, whilst it is recognised that the NPS is the primary planning policy document in the ExA’s assessment of the Scheme, account should be taken of the NPPF and Local Plan policies of the local authorities.

### 3.3 NPPF

3.3.1 The NPPF was updated by the MHCLG and published in December 2024, this superseded the previous version of the NPPF published in December 2023. The NPPF sets out the Government’s national planning policies for England and is an important and relevant consideration in planning decisions. The NPPF does not provide specific policies for NSIPs, however, paragraph 1.10 of the 2024 NPS NN states that the NPPF ‘may be an important and relevant consideration in decisions on NSIPs, but only to the extent relevant to that project’.

### 3.4 Blackpool Development Plan

3.4.1 The Development Plan for Blackpool is the Blackpool Local Plan 2012-2027 which comprises two parts; Part 1: Core Strategy was adopted in January 2016 and Part 2: Site Allocations and Development Management Policies was adopted in February 2023.

3.4.2 BBC has begun preparation of a new Local Plan for Blackpool which will set out a vision and policy framework up to 2045. Once adopted, the new Local Plan would replace the current Part 1 and Part 2 documents but this is currently at an early stage. It is not anticipated that any new draft policies will get to the stage of being a material consideration during the lifetime of this DCO Inquiry process.

3.4.3 Local Plan policies considered the most relevant are summarised below in the Council’s Local Impact Report and attached in full in **Appendix 1**.

#### ***Blackpool Local Plan Part 1: Core Strategy (2012-2027)***

3.4.4 The Core Strategy was adopted in January 2016 and sets out where new development such as housing, employment, retail and leisure should be located to meet Blackpool’s future needs to 2027. It also identifies areas within Blackpool which are to be regenerated, protected or enhanced and sets out key development principles, including those relevant to design, biodiversity and drainage.

3.4.5 The vision for Blackpool within the Core Strategy is set around building upon its status as a seaside resort, to support its culture, entertainment and business tourism offer.

3.4.6 Relevant policies are listed below, expanded policy wording is provided in the following chapters where relevant to the topics to be discussed and full details are provided within **Appendix 1**:

- NPPF1 (Presumption in Favour of Sustainable Development)
- CS3 (Economic Development and Employment)
- CS5 (Connectivity)
- CS6 (Green Infrastructure)
- CS7 (Quality of Design)
- CS9 (Water Management)
- CS10 (Sustainable Design and Renewable and Low Carbon Energy)
- CS11 (Planning Obligations)
- CS21 (Leisure and Business Tourism)
- CS22 (Key Resort Gateways)
- CS24 (South Blackpool Employment Growth)
- CS27 (South Blackpool Transport and Connectivity)

#### ***Blackpool Local Plan Part 2***

3.4.7 The Blackpool Local Plan Part 2 seeks to allocate sites for development, safeguarding or protection and sets out policies to guide appropriate development subject to these allocations. The Plan was adopted in February 2023. Relevant policies are listed below and the full wording is provided in **Appendix 1**:

- DM7 (Provision of Employment Land and Existing Employment Sites)
- DM8 (Blackpool Airport Enterprise Zone)
- DM17 (Design Principles)
- DM19 (Strategic Views)
- DM28 (Non-Designated Heritage Assets)
- DM30 (Archaeology)
- DM31 (Surface Water Management)
- DM33 (Coast and Foreshore)
- DM35 (Biodiversity)
- DM36 (Controlling Pollution and Contamination)
- DM41 (Transport Requirements for New Development)
- DM42 (Aerodrome Safeguarding)

- 3.4.8 The Greening Blackpool SPD (adopted March 2025) provides guidance for new development on matters of landscaping and green infrastructure. The intention of this guidance is to ensure that all residents have access to a sufficient amount of good quality public open space and to support improvements to biodiversity, environmental quality and the appearance of Blackpool.

## 4.0 CUMULATIVE IMPACTS

### 4.1 Cumulative Impacts Associated with Extent of Proposed Works

4.1.1 The importance to consider cumulative effects in planning and decision making is set out in planning policy, particularly the National Policy Statements. The overarching National Policy Statement for energy (EN-1), for example, specifies a range of aspects for which the Applicant's assessment in the Environmental Statement should consider cumulative impacts, as relevant to the development.

4.1.2 Paragraph 4.1.5 of EN-1 states that the Secretary of State should take any long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts into account, when weighing the adverse effects of a scheme against its benefits.

#### ***Cumulative Impact of wider Development***

4.1.3 There is insufficient detail and therefore certainty in respect of the proposal currently, in particular the routes, mechanisms and rights required to implement the DCO if granted. Further information is required from the Applicants regarding the potential and actual effects and consequent cumulative impacts of both on- and off-shore wind farm schemes upon the matters raised within this report. Additionally, consideration should also be given to other committed developments in the area which are due or expected to be brought forward within the same timeframe. In respect of Blackpool, the following proposed developments are considered of relevance:

- Development at Blackpool Airport; to include new hangars and relevant infrastructure; and
- Development at Blackpool Airport Enterprise Zone; to include, Silicon Sands, a solar farm, employment development at Common Edge Road.

#### ***Cumulative Impacts of Project A and B***

4.1.4 Clarification is required by the Applicant, including within the DCO supporting documents, to justify the proposed transmission cable routes and their extent. Alternative cable routes should be expressed with certainty and assessed at the strategic and the local level, such as whether a single route is suitable for the Scheme, and clarification as to the depths of the proposed cables, precise routes and necessity for the extent of any land take, both temporary (up to 10 yrs) and permanent (for the lifetime energy runs through the cables).

4.1.5 The cumulative impacts of all elements of the Scheme within the scope of Projects A and B may result in a number of repercussions which may cause disruption and potential repeat consequences and as such, the appropriate phasing and programming of the Scheme is of the utmost importance. It is

considered that not all adverse effects are fully quantified within the DCO application documents and therefore currently not able to be fully assessed and determined with sufficient certainty.

***Clarification Required on Applicant's Works Plans***

- 4.1.6 Further clarification is required in respect of the Works Plan's submitted. At present, the areas identified and consequential rights are considered wider and of a greater extent than is necessary to facilitate the development. An example is that of the Starr Gate accessway where the rights sought to be acquired and purpose of such rights, far exceed the use of light craft. It is submitted that there are alternative collaborative mechanisms available.
- 4.1.7 There is also a lack of certainty as to the cable installation methods for different work areas, cable depths and routes, which makes the potential impacts of the proposed development difficult to assess. For example, as will be discussed further within this statement, the use of open cut trenching through Blackpool Airport land, and current wide rights sought will not be accepted in any circumstance by BBC due to the significant detrimental impacts they would have upon the airport's operations and consequently reputation.
- 4.1.8 The separation of works into Projects A and B leads to confusion as to how the works associated with each part of the Scheme will be brought forward and their duration; including whether they will run in parallel or in series. Until confirmation of this can be provided, the full cumulative impacts of the Scheme cannot be quantified, including but not limited to; disruption, maintenance and safety.

***Mitigation required on Works Plans***

- 4.1.9 Clear plans will need to be provided identifying the final proposals, this should include only the land necessary to undertake Project A and B and for a specified and not general purpose. Land beyond what is required should be removed from the red line boundary and rights schedules.



## 5.0 TRAFFIC AND TRANSPORT

### 5.1 Policies

#### *National Policy Statements and Legislation*

- 5.1.1 Whilst renewable energy proposals are addressed in overall terms in EN-3, traffic and transport is addressed as a generic impact in section 5.14 of EN-1 and 1.3.2 of EN-5. Relevant local policies are discussed below and are generally consistent with that of the NPS.
- 5.1.2 EN-1 states that where a new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure, the Secretary of State should ensure that the Applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.
- 5.1.3 EN-1 continues that “where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development.”
- 5.1.4 In respect of relevant local legislation, the Road Traffic Regulation Act 1988 places a duty on local highway authorities to take such measures as appear to the authority to be appropriate to prevent accidents, including the dissemination of information and advice relating to the use of roads, the giving of practical training to road users or any class or description of road users, the construction, improvement, maintenance or repair of roads for the maintenance of which they are responsible and other measures taken in the exercise of their powers for controlling, protecting or assisting in the movement of traffic on roads. BBC are the Local Highway Authority.

#### *Blackpool Development Plan Policies*

- 5.1.5 **Policy CS5 (Connectivity)** states that the Council aims to achieve a sustainable, high quality transport network and a quality arrival experience by, amongst other things; reducing road congestion through the elimination of identified ‘pinch-points’ and providing sufficient, high quality and conveniently located car parks to address capacity issues.
- 5.1.6 **Policy CS27 (South Blackpool Transport and Connectivity)** requires development proposals in South Blackpool to prioritise sustainable modes of transport between homes, jobs and supporting community facilities. Convenient access to public transport and improved pedestrian and cycle infrastructure is also required.

- 5.1.7 **Policy DM41 (Transport Requirements for New Development)** states that new development will only be permitted where the access, travel and safety needs of all affected by the development are met. This includes demonstrating that safe and appropriate connection to the road network is secured for all transport modes with mitigation required where traffic generated will impact on the surrounding highway network.

## 5.2 Cumulative Impacts

- 5.2.1 The proposals are considered to raise a number of issues in traffic and transport terms. In preparing this response due consideration has been given by BBC's Highways and Traffic Management Team to the following submission documents; the dDCO, Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement [APP-108], Street Works Plans [APP-158-APP-159], Access to Works Plan [APP-157], Outline Highway Access Management Plan ('**OHAMP**') [AS-052] and Outline Construction Traffic Management Plan ('**OCTMP**') [APP-211].
- 5.2.2 Traffic and transport impacts are expected to arise in particular in relation to the construction and decommissioning periods of the proposed Scheme. Currently, BBC's overriding concern is that there is not sufficient information available to duly assess the matters raised.
- 5.2.3 Whilst not lying predominantly within the Borough of Blackpool, it is expected that any restrictions on traffic flows on Clifton Drive and / or Queensway will lead to congestion on both routes and the wider area. These roads are the only two routes connecting St. Annes Beach and Blackpool, and there is not sufficient capacity in the network to absorb this impact. This has the potential to impact upon the local economy by increasing commuting times and affecting visitor travel, as well as causing disruption to the local community in their day-to-day trips. The timings of the construction activities are understood to be indicative currently, therefore, there is insufficient detail to allow a thorough assessment of impacts to be undertaken.
- 5.2.4 At present, the limited information provided on the phasing of Projects A and B means that cumulative impacts have not been adequately assessed, and in practice the effects of traffic arising from the Scheme may be underestimated over a significant period of time dependent on the duration and whether they will run in parallel or separately. Should there be delays between the commencement and completion of the two elements, impacts on the highway would be exacerbated. As such, co-ordination between Projects A and B should be sought to minimise disruption wherever possible.
- 5.2.5 The potential cumulative impact of the Scheme, combined with other developments that are being built out, committed developments, those subject to planning applications or required by utility companies, requires further consideration and confirmation from the Applicants that any resultant impacts would not be severe.

5.2.6 The proposals should support the maintenance of safe and convenient access for all, particularly given the importance of tourism-based events and activities for the Fylde Coast's economy. Currently, a lack of information regarding the Scheme's programme prevents a full assessment of the possible impacts.

5.2.7 Lancashire County Council ('LCC') in their role as a Host Authority over a substantially larger area than BBC has undertaken significant assessment of the Applicant's submission. BBC has reviewed their Relevant Representations [RR-1262] and fully support the various conclusions of their assessment.

### 5.3 Mitigation / Adequacy of the DCO in respect of Cumulative Impacts

5.3.1 BBC welcomes the preparation of an OCTMP, however further detail on the intended programme of works and construction scenarios is required for BBC to be able to assess and consequently be assured of the full implications of the proposed development. Consideration should be given to the impact of the construction and decommissioning periods where they coincide with known events that take place on the Fylde coast including; the Lytham Festival, golf tournaments, Blackpool Illuminations and peak tourism periods such as school holidays and the summer months, alongside other development schemes such as those at Blackpool Airport Enterprise Zone and significant utility upgrades / repair work. BBC would be happy to provide the Applicant's with further information on each of these. A cumulative assessment should then be undertaken.

5.3.2 Mitigation must be proposed for potential conflicts, such as, through early consultation with users, publication drops and appropriate signage. Events such as the Illuminations bring a greater amount of traffic to the area later in the evening and so any extended periods of working will need to take this into consideration. Appropriate alternatives to working periods should be considered during these times. Relevant mitigation will require agreement with the Local Highways Authorities (including BBC) prior to commencement.

### 5.4 Impacts of Construction / Decommissioning Traffic

#### ***Starr Gate***

5.4.1 It is understood that the dDCO allows for Starr Gate to be subject to a temporary possession which may include closure, of which the specific details are unknown. It is not clear at this time what the extent of use of this access will be. This accessway provides the direct and only access to a number of Blackpool assets, namely the tram depot, a large electricity substation and sailing and angling clubs. It is also the access for emergency services, including the RNLI, HM Coastguard and Fire and Rescue, to a significant stretch of beach to the north and south and for maintenance and monitoring of the sea walls and dunes. In addition, the road and ramp are used by the general public to access private facilities and the beach for recreational purposes. Any changes to access would impact upon these users.

- 5.4.2 Within LCC's Relevant Representations concerns are raised regarding the unsuitability of some minor roads because of the carriageway width and / or lack of footways or significant verges. This concern extends to the Starr Gate access where the carriageway of the private road narrows to under 5m (and then further narrows at the slipway). Due to this, larger vehicles would struggle to pass each other if meeting at the wrong point and similarly, pedestrians and cyclists would have little clearance to larger vehicles at some points. Stationary vehicles could block the access entirely.
- 5.4.3 There are significant utilities present within the Starr Gate access corridor which may require works for protection. Access would need to be maintained to these utilities for maintenance and monitoring purposes. In particular, data cables owned and operated by Aquacomms and Vodafone come ashore and run through the sand under the dunes to a chamber in the sailing club compound and then alongside and under the Starr Gate accessway. They are understood not to be laid within concrete under the beach and dunes and therefore would be readily subject to damage from heavy plant. These cables are nationally significant infrastructure and uninterrupted use of these utilities is essential. The Aquacomms cable carries traffic to Isle of Man, Dublin and the USA in 0.64 milliseconds, through to Newcastle and then to Denmark, and at this point to the European Union. A plan illustrating the route is provided in **Appendix 2**.
- 5.4.4 The uninterrupted operation of this infrastructure is therefore of national and global importance, and for BBC forms a critical part of the Silicon Sands development and long-term plans for the Blackpool Airport Enterprise Zone. Further investigations are therefore required by the Applicant to determine if works are needed to protect this infrastructure, or, the rights and proposed uses of Starr Gate need to be better described and restricted so as to give comfort that this infrastructure is not at risk. Protective Provisions as currently worded in the dDCO are not considered to provide the extent of protection required for this vital infrastructure.
- 5.4.5 The accessway is considered suitable for consistent use by light vehicles and small trailer vehicles but not heavy vehicles. As such, further information is required from the Applicant advising how construction vehicles are envisaged to enter and traverse Starr Gate and the expected type and size of vehicle and any plant to be transported. Sufficient detail should be provided to evidence that these movements can take place safely and without detriment to the condition of the accessway or cable routes, with appropriate protection put forward. A third-party assessment of the structural integrity of the slipway is requested by BBC, axle loads should then be limited and surface protection installed to comply with assessment recommendations.
- 5.4.6 The Starr Gate junction also represents the beginning of the Blackpool Illuminations route, with visitors directed here to then travel northwards along the Promenade to see the full length of the illuminations. The ability to continue to do this should not be restricted at any point in lifetime of the proposed

development as it would have a great impact on visitor experience, the logistical planning of the event and consequently a potentially significant economic impact.

5.4.7 In the case of Starr Gate, should the land within the proposed order limits be closed to traffic, the direct effect would be to prevent the following:

- Access to and egress from the Tram Depot, other business premises, active and passive recreational users to the beach and sea wall
- Traffic movement from any other arm to the Promenade A584 on the north side of the junction (the main flow of Illuminations traffic)

***Squires Gate Lane access into Blackpool Airport***

5.4.8 A route from Squires Gate Lane through Airport operational land has been identified on the Applicants' submission documents and orally at the ISH1 Hearing. The use of this route has the potential to impact adversely upon the operations of the Airport for the duration of the Scheme. Therefore, further information is required on the cable route, depths and extent of rights necessary to implement the Scheme in order to provide certainty over how this would be managed. It is also requested that the Applicant confirm at what stages of the proposed development this accessway would be utilised (for example: construction, maintenance, or emergency).

5.4.9 Squires Gate Lane A5230 is the signed route from the M55 to a large part of Blackpool and is also well used as a route to St. Annes. In the holiday season, as well as for special events and particularly during the Illuminations there are heavy traffic flows and, at times, significant congestion. To exacerbate this would be to directly affect the economics of the tourist industry of the town and its neighbours. Should a closure of the westbound part of Squires Gate Lane at the Airport's designated emergency access be required, as indicated and to the extent shown by the red edge, this would prevent the following without significant traffic management arrangements:

- Egress from that part of the Airport estate (entry side is not identified to be occupied on the Applicants' plans)
- Any traffic movement from another arm to the west side of the junction (the main flow of Illuminations traffic)

### ***Wider Implications***

- 5.4.10 As presented, the proposed development offers significant scope for flexibility, both in terms of methodology and the duration of programming of each element of work. Unfortunately, this means the current level of detail available is limited and makes constructive comment on the potential implications difficult.
- 5.4.11 The construction and decommissioning activities associated with the Scheme may impact how emergencies in the local area are managed and responded to. The Starr Gate accessway provides direct access to the beach for services responding to coastal emergencies and Blackpool Airport has air ambulance capabilities. Should access to either be obstructed this could impact upon the efficiency of emergency response. As the development would likely impact upon routes simultaneously, previously perceived alternatives may not be available and so an understanding of how existing access routes would be maintained / alternative routes facilitated will need to be provided for the duration of the works.
- 5.4.12 There are existing bus routes which traverse Squires Gate Lane, Clifton Drive North and New South Promenade. The Scheme should not detrimentally impact upon the routing and timetable of these services which support the local population in their day-to-day needs.
- 5.4.13 The extent of works and the working hours have the potential to impact local businesses and residents. The Applicants have set out within the OCTMP, proposed core working hours of 0700-1900 Monday to Saturday and also advises that there may be up to one hour before and after for mobilisation, 0600-0700 and 1900-2000 weekdays and Saturdays. Further to this, allowances are made for a continuous working basis 0000-0000 Monday to Saturday for specific works. No information is provided on the extent of works which may be undertaken on a 24 hour basis and the potential impact this may have on residential amenity. Reference is also made within the OCTMP to mobilisation not including HGV movements into and out of sites and suppliers using light vehicles being able to make use of the wider highway network outside of these hours to travel to or from site. This raises concerns in respect of highway safety particularly with increased traffic on local roads during these hours and the spring/summer period.
- 5.4.14 Inadequate assurance has been given within the submission documents regarding the mitigation of impacts and reinstatement of highway assets post-development, nor is there sufficient detail on their mechanism of delivery. As such, BBC is concerned that there would likely be unremedied damage to the highways for at least a period of up to 10 years and perhaps indefinitely. The level of which may be significant given the lack of detail as to the number and type of vehicle movements expected across the entirety of Projects A and B.

- 5.4.15 In the case of either Starr Gate or the access to Blackpool Airport, the occupation (as a closure) of the land within the proposed order limits would have very serious consequences in displacing traffic. This applies particularly within tourist seasons where even if extensive diversion signage were provided, local traffic would inevitably divert through residential roads in significant numbers. It is noted that there are vacant areas of land adjacent to the edged sites which could be occupied in some way. Further information is required from the Applicants on this matter.
- 5.4.16 The areas of highway indicated to be potentially occupied on Queensway B5261 and Clifton Drive North A584 (in Fylde) are also of concern. The two roads connect Blackpool, the M55 and St. Annes with no other alternative, although traffic to Ansdell and Lytham has the benefit of the new link road. In the Council's experience it has been clearly demonstrated through other schemes the effect of temporary traffic management on either road, leading to congestion on the road directly affected and diversion to the other, precipitating congestion there. As such, this issue clearly needs the careful co-ordination of the Applicants.

***Abnormal Indivisible Loads***

- 5.4.17 In respect of Abnormal Indivisible Loads ('AIL'), Squires Gate Lane railway bridge is certified to SV-80 Classification. This means a standard vehicle of the SV80 class can cross without any special instructions (such as only vehicle on the structure / modified lanes / reinforcement). This is limited to 80t MGWV with an axle loading limit of 12.5t. This should be suitable for most abnormal loads however, anything larger would need a full assessment and modelling to ensure safety. Clarification should be provided by the Applicants on the type, timing and routing of AIL's proposed.
- 5.4.18 The above clearly indicates that the consequences of delivery of this scheme are not adequately set out with sufficient certainty. As such, as the host / neighbouring authority (Local Highways Authority) BBC do not consider the Scheme to be acceptable with the information provided. Further analysis is required which should be supported by necessary mitigation.

**5.5 Mitigation / Adequacy of the DCO regarding Construction / Decommissioning Traffic Impacts**

***Working Hours***

- 5.5.1 BBC acknowledges the working hours set out within the submission; however, these are substantially longer than BBC would accept for development works (0800-1800 Monday to Friday and 0800-1200 Saturdays and no working on Sundays or public holidays). Therefore, further clarification is necessary to understand how the extended working hours may impact local residents, businesses and other operations. Inclusion of Saturday as a full working day would conflict with trips for leisure and tourism purposes. As such, the proposed working hours should be considered further.

- 5.5.2 The impact of construction traffic throughout the construction and decommissioning periods should be consistently monitored in collaboration with the Local Highways Authority and mitigation carried out where determined necessary and appropriate.
- 5.5.3 BBC would expect the provision of dilapidation surveys and remedial works for any repairs for all roadways utilised in the Scheme. This work should comprise of; prior to commencement, an assessment of the existing condition of the highway in the immediate vicinity of the site, followed by, within an agreed timescale post-construction and decommissioning periods, a further assessment of the condition of the highway and a scheme of remediation, including a timescale of works to make good any damage caused to the highway. The scheme of remediation should then be implemented in full accordance with the approved timetable. Mitigation should be considered in collaboration with the Local Highways Authority to ensure that any damages can be rectified to a standard appropriate for all parties, this should include damages to the road surface, street furniture and any other kind of damage to the road network. Works of improvement required to make roadways fit for purpose during the Scheme's lifespan may be accepted as permanent rather than required to be removed post-works dependent on the extent of works undertaken. This would require further consultation with the Local Highways Authority where relevant.
- 5.5.4 Should there be significant delay between Projects A and B's commissioning and decommissioning periods then appropriate repairs should be made between each. The OCTMP indicates that consideration will be given to dilapidation before and after the use of 'roads' but would exclude A and B class roads. The Council and County Council would normally seek this mitigation as a conditional requirement for planning approvals for major schemes, such as coast protection works, therefore, the blanket exclusion is unacceptable and a more extensive arrangement should be provided to include all road ways to be utilised by the Scheme including private roads and slipways.
- 5.5.5 The rights to be acquired in the dDCO are Temporary Possession rights and more substantive than is understood to be required based upon the Applicant's comments at the Hearing. BBC request that the rights set out in the dDCO as far as they relate to the Starr Gate accessway and slipway are deleted and the Applicants should work with BBC to determine alternative and collaborative working. Access will need to be retained via the Starr Gate access for the operations which currently utilise this entrance point. This should be maintained for the length of the Scheme. Further information should be provided on the Applicant's intentions for this access and the conditions of this and any associated traffic management required. This may include the use of banksmen, and specific measures should be agreed between the Applicants and relevant parties. In the event that vehicular activity was at a level that introduced additional risk to pedestrians and / or conflict with other vehicles BBC would expect the contractors' vehicles to be appropriately managed and such measures to be agreed with BBC in advance. It is unknown whether alternative access routes have been considered and clarification should be provided. Should closure of the access not be required this should be deleted from the rights



set out within the dDCO. Should heavy vehicles be required to utilise the slipway, appropriate third party assessment of the structural integrity of the slipway and for axle loads should be undertaken prior to use and any subsequent use of the slipway should be limited to comply with that assessment.

- 5.5.6 Within their Relevant Representations, SP Energy Networks have requested that the Applicants provide an overlay plan of their assets and the proposed DCO limits. BBC support this request and ask that this include detail of all underground utilities to provide clarity over potential impacts. This should include a schedule of any crossover points and what these are.

***Extent of Temporary Works***

- 5.5.7 The red edge identified on the Works Plan – Sheet 3 of 21, illustrates that the signal junction and north side of Starr Gate and the beach access straddle BBC and Fylde boundaries. The area of the signalised junction is subject to a cross-boundary agreement and administered by BBC. Therefore, Schedules 3A, 3B, 4A and 4B within the dDCO should be reviewed and updated where necessary to reflect this.
- 5.5.8 The dDCO lacks clarity on the temporary closures and works at Starr Gate and the Squires Gate Lane / New South Promenade / Clifton Drive North junction. Further information is required from the Applicants on these works so that the ramifications, beyond maintaining access, may be assessed in relation to maintaining the continued operation of local businesses and the potential impact on key tourist events.
- 5.5.9 Clarification is also required on the construction traffic plans to understand the extent of works to be undertaken in each location. Currently, the arrows shown create confusion as the directions appear contrary to the routing indications.
- 5.5.10 It is considered that the powers set out within the dDCO in respect of highways are excessive and unnecessary to provide access to the site compounds and works areas. As such, further clarification from the Applicants on the extent of works is required so that legitimate review and opportunities to raise concern can be accommodated.
- 5.5.11 The comments made within this LIR relate only to the extent of routes shown to be affected within the Applicants' submission. Clarification should be provided by the Applicants to confirm whether consideration has been given to the event whereby one of these routes is unexpectedly unavailable, with evidence that alternative routes have been reviewed as these are not a part of the submission. BBC will require routing of traffic associated with the Scheme to be controlled through the dDCO to limit it to only the routes shown.

***Squires Gate Lane Entrance into Blackpool Airport***

- 5.5.12 Further detail is required on the access route from Squires Gate Lane through the Airport. Consideration is required to the potential conflict between vehicles associated with the Scheme and access to Airport infrastructure including emergency vehicles. Further information regarding the frequency, type of vehicles and personnel expected to utilise this route would support the review of impacts.
- 5.5.13 The red edge appears to only cover the exit side of that arm of the junction. This should be reviewed by the Applicants.

***Emergency Vehicles***

- 5.5.14 Both Starr Gate and the Squires Gate Lane entrance into Blackpool Airport play important roles as existing in assisting access for emergency vehicles. The implications of the Scheme upon access for these services has not been sufficiently considered within the application. Consideration should be given by the Applicants to the existing emergency access arrangements and where potential conflict with the proposals is identified, the Scheme should be altered or appropriate mitigation agreed with relevant parties.

***Use of Abnormal Indivisible Loads***

- 5.5.15 Assurance should be given that in respect of AIL's, only those of a weight appropriate for the structures along the route will be used. Clarity should be provided within the CTMP and TMP to enable an understanding of use and frequency of AIL's and these are to be agreed with the highway authorities.

***Construction Traffic Management Plan***

- 5.5.16 It is acknowledged that an OCTMP has been included within the Applicant's submission. However, it is necessary for the details of such to be developed and agreed at an early stage with appropriate mitigation embedded through the dDCO. At present, sufficient detail is not available on the matters raised previously within this chapter, to give BBC certainty that all matters can be overcome and a safe scheme provided. The CTMP should be developed in consultation with the relevant highways authorities and require their approval prior to commencement of each stage of development. Compliance with the CTMP will be monitored throughout the Scheme and any breaches will require resolution.
- 5.5.17 BBC welcome the opportunity to participate in future engagement with the Applicant's regarding traffic and highways matters alongside LCC.

## **5.6 Impacts of Operational Traffic**

- 5.6.1 BBC require clarification on the Applicant's intended usage of the access road from Squires Gate Lane through Blackpool Airport. BBC recognises that limited access may be required for maintenance during the operational phase but requires more detail on this, including parking implications, land usage and purposes for visits. Until this information is submitted, BBC cannot fully assess this matter.

## **5.7 Mitigation / Adequacy of the DCO regarding Operational Traffic Impacts**

- 5.7.1 Further information is required to obtain certainty on potential usage of vehicular routes and land within the operational period of the development. It is considered that currently the dDCO and supporting documentation do not provide sufficient information to enable an adequate traffic assessment.

## 6.0 TOURISM AND RECREATION

### 6.1 Policies

#### *National Policy Statements*

- 6.1.1 EN-1 relates to socio-economic impacts at paragraph 5.13.1 and of relevance considers that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels. Parts 2 and 3 of NPS EN-1 sets out some of the national level socio-economic impacts which includes:
- effects (positive and negative) on tourism and other users of the area impacted; and
  - the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities
- 6.1.2 The NPS recognises that socio-economic impacts may be linked to other impacts, for example visual and traffic effects may impact on tourism and local businesses. Applicants are encouraged in the NPS, where possible, to demonstrate that local suppliers have been considered in any supply chain.
- 6.1.3 EN-1 continues to state that the Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.

#### *Blackpool Development Plan Policies*

- 6.1.4 **Policy CS21 (Leisure and Business Tourism)** of the Core Strategy states that in order to physically and economically regenerate Blackpool's resort core and town centre, the focus will be on strengthening the resort's appeal to attract new audiences year-round.
- 6.1.5 **Policy CS22 (Key Resort Gateways)** of the Core Strategy states that the Council will provide assistance to facilitate major redevelopment schemes to assemble sites and properties where appropriate. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips.
- 6.1.6 **Policy DM19 (Strategic Views)** of the Local Plan Part 2 requires development to protect and enhance the views of the following buildings and features of strategic importance: Blackpool Tower and along the seafront and coastline. Development that has a detrimental impact on these strategic views will not be permitted.

## 6.2 Tourism Impacts

- 6.2.1 Blackpool and the wider Fylde coast represents a popular seaside destination with tourism and the service sector underpinning the local economy. Blackpool itself receives over 20 million visitors every year and has a thriving visitor economy worth £1.7bn. There are 22,000 visitor economy jobs in Blackpool and 50,000 within a 60-minute drive. Events of note include the Illuminations, Blackpool Air Show, Lytham Kite Festival and Lytham Festival. Although some of these events are held in Fylde, visitors often stay in or also visit Blackpool whilst visiting. Therefore, BBC are particularly concerned about direct and indirect impacts of the Scheme upon tourism and visitor numbers.
- 6.2.2 Blackpool's growth and prosperity programme seeks to utilise £2bn worth of funding to undergo a major regeneration programme to support town centre regeneration, extend the tourism season and create new jobs in growth sectors. As such, the Scheme should not detrimentally impact or prevent this work from being brought forward.
- 6.2.3 Information prepared for the Lancashire region illustrates that there were 66.7 million tourism visits to the region in 2023. Based upon the figures above, this illustrates the importance of Blackpool's visitor economy as it equates to around a third of this figure. Further information on this matter is provided within **Appendix 3** and additional information can be provided to the Applicants on request.
- 6.2.4 The tram is a key piece of tourism infrastructure, with the line running for 11 miles from Starr Gate in the south to Fleetwood in the north. The proposals include temporary closure of Starr Gate, however, the duration and extent of this is currently unknown to BBC. Should the works prevent or disrupt use of the Starr Gate depot this would inevitably cause disruptions to the wider tram network and associated visitor experiences. The same concern is raised in respect of visitors to the Illuminations which run from August bank holiday to the beginning of January each year, with the beginning of the route being the Starr Gate / Squires Gate Lane junction.
- 6.2.5 The Promenade is a key tourism asset and provides an important recreation space. Should areas of the seafront and beach at Lytham St. Annes be closed or disrupted due to the works, this would have an impact upon the day-to-day activities of local residents, as well as visitors. There would also be a displacement effect, increasing usage of beaches elsewhere and potentially causing maintenance and ecological impacts.
- 6.2.6 Disruption during the construction and decommissioning periods has the potential to affect the number of visitors to Blackpool and also negatively impact their experience should delays be incurred. There may be impacts upon pedestrian and vehicular safety due to increased highways movements and also severance of known routes between Blackpool and Lytham St. Annes impacting visitor numbers and

enjoyment. Road closures elsewhere on the local road network can cause displacement and confusion and this will require mitigation from the Applicants. It is also essential that access to existing car parks is retained.

- 6.2.7 As set out within the previous chapter, there are significant highways implications to the Scheme which would have a direct impact upon tourism without further assessment, given the duration of works proposed.

### **6.3 Mitigation / Adequacy of the DCO against Tourism Impacts**

- 6.3.1 Thorough reporting of visitor numbers to Blackpool and the wider Lancashire region is undertaken on a regular basis. As part of the works, these numbers should continue to be monitored and any losses and impacts identified.
- 6.3.2 Works in the vicinity of Starr Gate and Squires Gate Lane which may lead to disruption or closure may potentially impact negatively on existing businesses, residents and tourists. It is therefore requested that the Applicant assess this possible impact and provide appropriate mitigation where necessary.
- 6.3.3 A clear and final programme of works should be issued for consideration at the earliest stage, including the extent of any proposed closures. Should conflict be identified with visitor-based events, mitigation should be provided. This should be wholly considered within the Construction Traffic Management Plan, taking into account the increased number of vehicles and pedestrians expected during key holiday periods. This would require appropriate management by the Applicants to ensure safe access is retained and that there would be no short- or longer-term impact on tourist activity, which is of significant importance to the Fylde coast.
- 6.3.4 For the period of the works, the Applicants must ensure that key tourism destinations remain legible and accessible, including visitor car parks. Mitigations must be balanced to ensure that local residents are not unduly impacted by the proposed works. The Applicants must consider that those affected may not just be local to the area, particularly during the holiday season. Tourism is important to the local economy and must be fully assessed as the potential impact upon tourism is considered to be high.
- 6.3.5 Works in one area may cause displacement effects and ultimately impact a wider area, such as through the movement of sand. Further information and certainty as to the proposed works is required on the extent of works so that the potential for these impacts can be considered.

## 6.4 Impacts on Recreation

- 6.4.1 In assessing impacts upon recreation, the following documents have been considered; Volume 3 Chapter 6 (Land Use and Recreation) of the Environmental Statement, Public Rights of Way Plan ('**PRoWP**') and the Outline Public Rights of Way (PRoW) Management Plan ('**OPRoWMP**').
- 6.4.2 The beach at Starr Gate plays an important role for the local community in providing space for recreational activities. Local dog walkers, runners, walkers and those involved in watersports frequently utilise the beach here to undertake these activities. Any restriction in the ability to carry out such activities would have a detrimental impact upon local residents both in terms of their physical and mental wellbeing.
- 6.4.3 The PRoWP identifies that both the National Cycle Route 62 and Lancashire Coastal Way where they run along Starr Gate would be impacted by the proposals. The dDCO states that this may be temporarily closed, altered or diverted. For BBC to adequately understand the impact that the closure of this access would have, further information is required on the extent and duration of the closure and proposed diversions. At present, it does not appear that a diversion has been identified for users of the cycle route travelling in either direction, although it is assumed users would be expected to join the highway along this stretch north and south of the tram depot.
- 6.4.4 Bridleway 11 runs north-south to the east of the Airport. It is proposed on the OPRoWP that a central portion of this route would be temporarily closed or restricted due to the works where it travels across the order limits. The bridleway provides an important route between Blackpool and St. Annes, away from the main highway and its temporary closure would have a detrimental impact upon users who would need to consider alternative routes.
- 6.4.5 Whilst the airport represents a commercial facility, it also supports recreational pursuits, via recreational flights, training and experiences. The proposals currently identify access for the works through the Airport from Squires Gate Lane and this may impact upon the ability to access these facilities.
- 6.4.6 The works may also affect Blackpool residents from accessing physical activities and recreational pursuits.

## 6.5 Mitigation / Adequacy of the DCO against Recreational Impacts

- 6.5.1 Closure of, and restriction to, recreational routes should be limited to that absolutely necessary to undertake the works. Further detail should be provided to BBC in respect of the proposed closures and assessment of the potential impacts. Clear signage and publicity would be required to advise users of

any closure that may impact upon their daily routine ahead of time. Should any damage be caused to these routes or the beach this should be subject to appropriate mitigation measures to enable its continued use in the future once works are completed.

- 6.5.2 Appropriate compensation must be provided from the Applicant to mitigate any disruption, whether this be in the form of a fund or other benefit to residents (such as reduced energy costs as identified elsewhere within this report).



## 7.0 BIODIVERSITY

### 7.1 Policies

#### *Blackpool Development Plan Policies*

- 7.1.1 **Policy CS6 (Green Infrastructure)** of the Core Strategy states that international, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats / species will be required where necessary.
- 7.1.2 **Policy DM35 (Biodiversity)** of the Local Plan Part 2 states that development proposals will be required to result in no loss or harm to biodiversity through avoidance, adequate mitigation or compensatory measures. Good design should provide net biodiversity gains. Development will not be permitted in or adjacent to an SSSI where it would adversely affect, directly or indirectly, its wildlife and nature conservation importance. The only exception is where the benefits of the development clearly outweigh both its likely impact locally and any broader impacts.

### 7.2 Biodiversity Impacts

- 7.2.1 Matters of biodiversity have been assessed in relation to Volume 3 of the Environmental Statement, the Outline Ecological Management Plan ('OEMP') and Onshore Biodiversity Benefit Statement ('OBBS'), as submitted by the Applicants.
- 7.2.2 The principal concern in respect of biodiversity is that the Scheme would result in the loss and disturbance of habitats and introduce structures, such as lighting, which would fragment and sever ecological connectivity. The loss of habitats has the potential to result in the loss of or disturbance of breeding, sheltering, hibernating, foraging, commuting and dispersal habitats of priority or protected species. Natural England have provided a comprehensive response to the proposals, which BBC fully supports.
- 7.2.3 Of particular concern to BBC is the impact of the proposals upon the Lytham St. Annes Dunes and Ribble Estuary SPA's and SSSI's and also in respect of the potential relocation of wintering birds in association with land close to Blackpool Airport. Given the airport's operations, the site is subject to bird hazard management to dissuade birds from utilising the land for nesting, feeding or roosting. Any proposals should seek to reduce the potential of bird strike resulting from birds being moved off-course and creating a collision risk with an aircraft.
- 7.2.4 A temporary construction mitigation area is proposed at Lytham Moss to mitigate potential impacts on geese, swan and wader habitats. This land falls within Blackpool Airport's safeguarding / bird hazard

area and is subject to existing arrangements to manage bird levels. Any increase to current levels could pose a further bird strike risk and represent a significant safety risk to aircraft utilising the Airport. The proposed construction compound to the east of Queensway (works package 18A/B) also lies within the Airport's safeguarding / bird hazard area and could itself become an attraction to birds leading to a risk of bird strike unless managed appropriately. This requires further clarification from the Applicants.

### **7.3 Mitigation / Adequacy of the DCO against Biodiversity Impacts**

- 7.3.1 Further surveys are required to consider the impact of the proposals, particularly with regard to how the works could alter existing conditions.
- 7.3.2 It is considered that a reduction in the area of land within the order limits would reduce the potential impacts whilst still enabling the Scheme to proceed in the same form.
- 7.3.3 Consideration should be given to elements of the construction and decommissioning periods which may have a detrimental impact on biodiversity, namely lighting, vibration, noise and air pollution. Lighting should be designed appropriately for the location and activities limited to reduce potential impacts.

## 8.0 AIRPORT OPERATIONS

### 8.1 Policies

#### ***National Policy Statements***

- 8.1.1 The NPS includes significant protections for airports and associated infrastructure, particularly defence. Paragraph 5.5.59 continues these protections and states as follows:

“Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether:

- A development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local / national economic loss, or emergency service needs
- It would cause harm to aerodromes’ training or emergency service needs
- The development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training
- The development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure”

- 8.1.2 The NPS safeguards airports which are a safeguarded airport and / or where the airport is used for defence purposes. Operations undertaken at Blackpool Airport, includes defence and HM Coastguard.

#### ***Blackpool Development Plan Policies***

- 8.1.3 **Policy DM8 (Blackpool Airport Enterprise Zone)** sets out guidance on development within this designation with the Council supporting the sustainable development of the EZ to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution to national growth. In supporting development at the EZ, the viable long-term operation of Blackpool Airport must be maintained.
- 8.1.4 **Policy DM42 (Aerodrome Safeguarding)** advises that the Blackpool Airport Authority and the Ministry of Defence (MoD) will be consulted on all development proposals as appropriate within the aerodrome safeguarding area/zones shown on the Policies Map to ensure there is no adverse impact on airport safety at Blackpool Airport or Warton Aerodrome.

## 8.2 Impacts on Airport Operations

### *General Considerations*

- 8.2.1 The Airport comprises a key economic driver within the Fylde Coast region. The site currently facilitates business and executive travel, flying schools, aviation training, bespoke fire training and specialist medevac services.
- 8.2.2 The Scheme as currently proposed would impact upon the operational Airport in the following ways:
- Temporary possession sought over parts of the Airport site in relation to construction access and temporary works areas;
  - Various permanent rights sought which reflect the Scheme's offshore export cables being proposed to connect onshore at transition joint bays to be located within the Airport site, from which export cabling is proposed to then run through the Airport site and across the main runway.
- 8.2.3 As set out in BBC's and Blackpool Airport's Relevant Representations, the Scheme, during the construction, operational and decommissioning phases, has the potential to cause substantial disruption and adverse impacts on the Airport's operations, through direct construction activities proposed on-site, the loss or temporary loss of airport facilities and the potential for conflict and interference with the Airport's operations. All would have a significant impact upon both safe aviation activities and the commercial operations of the Airport, as well as its reputation for remaining open, which as experienced following a temporary closure in 2014 would adversely impact the airport's ability to attract corporate and leisure aviation. BBC fully support the Airport's representations to this examination.
- 8.2.4 The Airport has a regulatory obligation to ensure that its aviation infrastructure remains active and operational at all times. It is not economically viable for the Airport to be subject to closure for any length of time. Disruption to services would result in air traffic having to be diverted elsewhere and in instances such as this, in the experience of BBC, users do not return to using the original facility once it is operational again and the knock-on effect to the reliability and reputation of the airport would be prohibitive to its future. The level of impact that the proposals may have on the Airport are not yet fully understood and this would depend upon the method of cable installation used. Open trenching within the airport boundary would be wholly unsupported by BBC based upon the aforementioned impact it would have on the airport's operations. Therefore, further information on the construction methodology and depth of cables is required to allow necessary assessment as to whether this is appropriate in relation to airport operations and that any mitigation and safeguarding can be put in place. It is also necessary to understand how the retention post-installation of the cables could impact future use of the land.

### ***Access to Airport Facilities***

- 8.2.5 As referenced elsewhere in this report, the airport has a key role in supporting emergency services and matters of defence (including North West Airport Ambulance, the National Police Air Service and the Coastguard). These operations may fall outside of the airport's normal operational hours but cannot be compromised. The Airport also hosts the military for various purposes, including Southport and Blackpool Airshows (including the Red Arrows), training flights and defence training exercises, as well as being a named alternative airfield for Warton Aerodrome, which is operated by BAE Systems. As such, it is of the utmost importance that BBC has sufficient information to allow an assessment of any impact upon these existing services. If the access road from Squires Gate Lane was closed off for any period of time this would impact upon the existing emergency services rendezvous point and access to the VSP (Vehicle Search Point) building, staff access to the airport and fuel deliveries, amongst other operations. The existing one-way access route at the airport is not wide enough to be made two-way and as such, concerns arise regarding maintaining access and egress should the road be blocked.
- 8.2.6 It is unclear why such a wide works corridor is proposed, which arcs across Runway 28. This should be reduced and moved away from the runway to enable its operation to be maintained.
- 8.2.7 The construction and decommissioning phases have the potential to generate dust and there are concerns in respect of the potential impact of foreign object debris (FOD) resulting from the Scheme which currently proposes to route construction traffic down the main taxiway. FOD refers to any object in an airport environment which could injure personnel or damage aircraft. Any such object would create potential safety hazards and impact operations at the airport. The mitigation proposed would need to be wholly effective with constant supervision during the works to prevent this taking place. This should be set out fully within the Dust Management Plan.
- 8.2.8 It is unclear what consideration has been given to below ground telecommunications at the airport and the St Anne's NATS radar station which also serves Manchester Airport and can be affected by vibrational and dust impacts. The operational phase of the Sc has potential to adversely affect future radar, current and future NavAids and other aspects of the Airport's operations and infrastructure, such as from the electromagnetic fields of the cables and potential EMI (Electro Magnetic Interference). Further information is required from the Applicant's in respect of these matters.

### ***dDCO Considerations***

- 8.2.9 In reviewing the dDCO, it is noted that Schedule 2A, Article 17 references that in works no. 21A a written scheme for the management and mitigation of internal and external artificial light emissions should be submitted to the relevant planning authority before being brought into operation. It is considered that given the sensitive nature of the location and its operations, the same should be required for any

lighting required throughout the works programme where needed for works in and adjacent to the Airport.

- 8.2.10 The dDCO also references unexploded ordnance in respect of marine areas. Given the historic use of the Airport land, it is felt pertinent that consideration should be given to the potential of such items within the order limits across the airport.
- 8.2.11 Article 47, which deals with inconsistent planning permissions, may present instances of conflict with the article at the slipway area or within the Airport.

### **8.3 Mitigation / Adequacy of the DCO against Airport Operation Impacts**

- 8.3.1 Further information is required from the Applicants to adequately assess the potential impact of the proposed Scheme upon airport operations. The Applicants are required to ensure that any development does not compromise the ability to provide a safe and efficient Airport, operationally and for air traffic services. They should demonstrate, to the satisfaction of the Airport's safety management system and the CAA regulatory body, that they can prevent or adequately mitigate any direct or indirect impacts upon the safe operation of the airport and its commercial operations. A full safeguarding assessment should be undertaken that confirms the proposals are safe and have no impact on the Airport's operations prior to works commencing.
- 8.3.2 BBC cannot accept any closure of the Airport to facilitate the Scheme, this must be incorporated into the DCO through a protective provision. As such, the order boundary should be amended so as to not impact upon the operational runway and an alternative approach brought forward.
- 8.3.3 The final solution for installation of onshore export cables should be confirmed so that a full assessment can be made. As discussed, the use of open cut trenching in this location is not supported by BBC.
- 8.3.4 Further assessment should be undertaken to consider the vibrational and dust impacts of works within the vicinity of the airport upon sensitive airport equipment and use of the runways. It is proposed by BBC that airport equipment must be replaced prior to any construction works taking place.

## 9.0 ECONOMIC DEVELOPMENT

### 9.1 Policies

#### *National Policy Statements*

- 9.1.1 The NPS recognises that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels. Parts 2 and 3 of EN-1 of the NPS set out some of the national level socio-economic impacts. The NPS “strongly encourages” and Applicant to engage with relevant local authorities during early stages of scheme development so that the Applicant can gain a better understanding of local or regional issues and opportunities.
- 9.1.2 The NPS states that the Applicant’s assessment should consider all relevant socio-economic impacts, which may include: the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK’s transition to Net Zero the contribution to the development of low-carbon industries at the local and regional level as well as nationally.
- 9.1.3 EN-1 at paragraph 5.13.12 states that the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.

#### *Blackpool Development Plan Policies*

- 9.1.4 **Policy CS3 (Economic Development and Employment)** of the Core Strategy promotes sustainable economic development including promoting land in South Blackpool as a strategic priority. To improve employment opportunities the Council will seek to develop and deliver an effective skills agenda.
- 9.1.5 **Policy CS24 (South Blackpool Employment Growth)** of the Core Strategy states that the Council will support sub-regional economic growth in South Blackpool, including: Blackpool Airport Corridor and lands close to Junction 4 of the M55.
- 9.1.6 **Policy DM8 (Blackpool Airport Enterprise Zone)** of the Local Plan Part 2 supports the sustainable development of the EZ to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution to national growth. In supporting development at the EZ, the viable long-term operation of Blackpool Airport must be maintained.

## 9.2 Impacts on Blackpool Airport Enterprise Zone

- 9.2.1 The Scheme must not detrimentally impact upon the vision of the Blackpool Airport Enterprise Zone which is, to grow the Enterprise Zone to become a premier business location, where high quality businesses locate and facilitate economic growth and employment, and further develop the strong skills and knowledge base of residents along the Fylde Coast. BBC cannot accept works that would prevent development of land within Blackpool Airport or the Blackpool Airport Enterprise Zone boundaries. It is therefore necessary to understand the construction methods for the cable installation as well as any impacts their position may have on future use of the land during and post-operation of the wind farms. The use of the rights sought to ensure integrity of the cable infrastructure, such as preventing tree planting, materially altering ground levels, erecting buildings and storing substantial materials, needs to be understood by BBC to consider whether the Scheme sterilises the use of land for future development.
- 9.2.2 The Enterprise Zone seeks to attract over 280 no. new businesses and create circa. 5,000 new jobs over its lifespan. BBC will only support new development which would enable and facilitate the Enterprise Zone's objectives.
- 9.2.3 It is appreciated that the presence of offshore wind farm developments may attract future occupiers who wish to benefit from its location, especially if this results in subsequent access to reliable and lower cost electricity supply.
- 9.2.4 Works to implement the Enterprise Zone's vision are well underway and delays to the development of the Enterprise Zone should be discouraged. The installation of the CeltixConnect-2 cable has the potential to draw substantial investment to the Fylde Coast, including the Enterprise Zone, from those requiring a high performance internet access. Development which is expected to be brought forward in the near future comprises, a solar farm to the south of the airport runways, new airport facilities, such as new hangars and a new ATC tower and the implementation of Silicon Sands, including a landmark data centre. These developments are necessary to fulfil the Enterprise Zone vision and support its long-term future. Specific locations for some of this development, such as the cabling route from the proposed solar farm to the primary substation being constructed at Squires Gate has not yet been determined, and as such it is necessary to ensure that there is no conflict with this cabling and the transmission cables with final routing to be agreed upon by all parties.
- 9.2.5 The potential impact of works as part of this Scheme, delaying commencement or sterilising land which is marked for development cannot be understated.



- 9.2.6 There may also be other impacts of the Scheme upon businesses in this location by way of direct and indirect effects of the construction and decommissioning period, including but not limited to, highways disruption impacting upon commuting and deliveries or impacts of noise and dust.

### **9.3 Mitigation / Adequacy of the DCO against Impacts upon the Enterprise Zone**

- 9.3.1 To support BBC's understanding of the potential impacts of the Scheme upon the Enterprise Zone consideration should be given as to how the timing of the Scheme may affect the implementation of development in this location. The works plan indicates a large expanse of land south of the runway may be required which would extinguish development opportunities in this location for a significant time period. A solar farm is proposed for this location, subject to a screening opinion request to Fylde Borough Council currently, which would support development of Silicon Sands. As such, the Scheme may have cumulative negative impacts by preventing the solar farm coming forward, as uncertainty may stop end-users from moving to the Enterprise Zone.
- 9.3.2 There is a lack of information regarding the works within the airport and Enterprise Zone and whether these would directly impact upon the future design and scope of development in this location as it could remove design freedom and restrict potential plot sizes.
- 9.3.3 The Council will proactively communicate with the Applicants with regard to the possibility of energy production from the wind farms supporting operations within the Enterprise Zone and also wider provision for the residents of Blackpool.

### **9.4 Impact of Land Sterilisation**

- 9.4.1 The works as currently drafted in the Scheme would have a detrimental impact upon the ability of BBC to progress with earmarked schemes for development, particularly in respect of works and access arrangements proposed at Blackpool Airport and the Enterprise Zone. Sterilisation of land for future development would have a detrimental impact on the Council's economic goals for the borough and the status of the Fylde-Blackpool periphery as a strategic location for economic development. Partial sterilisation of Blackpool Airport for a short period of time, would result in major funding concerns for BBC.
- 9.4.2 Sterilisation of land identified to the south of Blackpool Airport for a solar farm development would prevent BBC from realising their vision for the Silicon Sands area of the Enterprise Zone, for which it would provide its own supply of renewable energy. To fully understand the impact of the proposals upon future development within Blackpool Airport and Enterprise Zone, accurate and final route identification for cable laying, as well as construction methodology and detail of depth of the cabling, must be provided by the Applicants. In summary greater clarity and certainty is required.

## **9.5 Mitigation / Adequacy of the DCO against impacts on Land Sterilisation**

- 9.5.1 BBC request further information on the proposed method of works and access to the site work compounds within the Enterprise Zone boundary as the extent and duration of impacts would be dependent upon the method of cable installation. The lack of detail within the application documents results in unacceptable uncertainty over the specific cable route, cable depths and the method of installation.
- 9.5.2 The Construction Method Statement or Method of Works Plan must contain certainty over the depth, time periods and method of cable laying proposed across all areas prior to deadline ISH2 to enable any impacts upon BBC owned land to be adequately considered together with funding implications. Full details of the extent of repair and reinstatement following the construction and decommissioning periods must also be provided.

## **9.6 Impact on Employment and Skills**

- 9.6.1 It is important that the Applicants work with their supply chains, contractors and local partners to recruit and train local people ahead of and during the construction period which would ensure that they develop their skills and are enabled to move between roles and different types of schemes. The Scheme, as part of the wider windfarm infrastructure projects, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. The presence of the Lancashire Energy HQ within the Enterprise Zone also provides opportunities for collaboration and supporting students with experience of local renewable energy schemes.
- 9.6.2 As such, the Scheme could have some minor positive impacts on the local supply chain through investment in local job creation and businesses, to support delivery and installation of the Scheme. To maximise opportunities, BBC expect the Applicant to work with local stakeholders to develop programmes that would support local businesses to grow and offer their services to supply the Applicants Scheme. In this respect, the authority welcomes the Applicant's production of an Outline Employment and Skills Statement and trust that through a continued collaborative approach on this matter, the Scheme would provide socio-economic benefits in this form. BBC wish to work with the Applicant to ensure activities are co-ordinated to maximise the possible benefits and prepare an agreed final Employment and Skills Statement. To do so is in accordance with the policies set out in the NPS.

## **9.7 Mitigation / Adequacy of DCO against impacts on Employment and Skills**

- 9.7.1 The Applicants should provide a commitment to support the local skills base, which is able to be formalised through the provision of a finalised Employment and Skills Statement. Any employment and

skills plan must include co-operation with the Blackpool & the Fylde College Lancashire Energy HQ to support the local community skills agenda.

9.7.2 dDCO requirement 19 should be amended to include consultation with BBC alongside other authorities and provide greater certainty of delivery with specified timeframes and outcomes to be met. Any final Employment and Skills document should be subject to the Council's agreement rather than notification to ensure all relevant considerations have been addressed. BBC would also suggest that the requirements of the Plan be covered by a S106 agreement to ensure that they remain enforceable throughout the lifetime of the Scheme. Amendment is sought to the current drafting in the dDCO of requirement 19 to ensure greater certainty of delivery of apprenticeships and the use of local labour and businesses during the construction and operational periods.

9.7.3 BBC, alongside Fylde Borough Council, Wyre Council and South Ribble Borough Council, have worked together to prepare a Joint Social Value Proposal which sets out how the Scheme can support the local community. A draft version of this document is provided in **Appendix 4** and BBC would welcome the Applicants participation in bringing the components of this forward throughout the Schemes lifetime.

## **9.8 Positive Impact of Renewable Energy Development**

9.8.1 In principle, BBC support renewable energy development and welcome potential opportunities for proximal energy supply to the Enterprise Zone from the wind farm developments, which would benefit the local economy and attract new businesses, particularly more energy intensive users, such as data centres, to the area. The potential for a thermal heating network would also present a range of benefits to the local community. Again, the Council are wholly supportive of working with the Applicants to review the potential ways in which the Scheme is able to support local communities, in accordance with the NPS.

## 10.0 FLOODING AND DRAINAGE INFRASTRUCTURE

### 10.1 Policies

#### ***National Policy Statements***

- 10.1.1 The NPS recognises that new energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.
- 10.1.2 The NPS recognises the aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding. Additionally, the government's Flood and Coastal Erosion Risk Management Policy Statement sets out the ambition to create a nation more resilient to future flood and coastal erosion risk. It outlines policies and actions which will accelerate progress to better protect and better prepare the country against flooding and coastal erosion.
- 10.1.3 The NPS considers that substantial weight should be attached to the risks of flooding and coastal erosion and the Secretary of State should be satisfied that the Applicant has fully considered the policy on assessment and mitigation in paragraphs 4.3.1 to 4.3.9 of EN-1, taking account of the potential effects of climate change on these risks.

#### ***Blackpool Development Plan Policies***

- 10.1.4 **Policy CS9 (Water Management)** of the Core Strategy requires new development to seek to reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change. Appropriate mitigation and resilience measures should be incorporated to minimise the risk and impact of flooding from all sources and incorporate appropriate Sustainable Drainage Systems.
- 10.1.5 **Policy DM31 (Surface Water Management)** of the Local Plan Part 2 sets out requirements for new developments. Surface water from development sites will be discharged via the most sustainable drainage option available. Approved development proposals will need to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.
- 10.1.6 **Policy DM33 (Coast and Foreshore)** of the Local Plan Part 2 will support proposals which secure further improvements to bathing water quality or flood protection. Development proposals that would

adversely affect the appearance, integrity or environmental quality of the beach and foreshore will be resisted. The Coast and Foreshore is identified on the Policies Map.

## **10.2 Impacts upon Flood Risk and Drainage**

### ***Flooding***

- 10.2.1 BBC has a coastal location, bound to the west by the Irish Sea. The whole of the borough is relatively flat low-lying land which is protected in the west from coastal erosion and tidal inundation from the Irish Sea by concrete coastal defences, inspections of which are undertaken on an annual basis.
- 10.2.2 The dunes comprise a natural form of sea defence with capital funding from the Environment Agency to maintain and accrete them. Each year the addition of used Christmas trees are used to accrete the system and this has had a positive impact. Further information is required regarding the depth and method of laying the cables under the dunes to appropriately assess whether they would impact upon the stability of the dunes and their ability to function as a flood defence.
- 10.2.3 Flooding is a known issue within South Blackpool. The Blackpool Level 1 Strategic Flood Risk Assessment states that this is due to an over-reliance on, and inundation of, the public sewerage network and Council operated pumping station, as well as inadequate watercourse maintenance. In addition, the Fylde Strategic Flood Risk Assessment states that the main source of flooding within the area of Blackpool Airport is surface run off, as there are significant areas which are susceptible to sewer flooding due to the high concentration of combined sewers and the low hydraulic gradients within these areas.
- 10.2.4 Due to this context, BBC has concerns in respect of potential flooding associated with the construction, decommissioning and maintenance of the Scheme.

### ***Drainage***

- 10.2.5 Drainage concerns of BBC include the potential impact upon the current drainage infrastructure capacity and the risk of damage to BBC owned drainage infrastructure in this location.
- 10.2.6 The Scheme has the potential to result in flooding arising from improper or poorly managed dewatering during the construction period. Reference is made within the submission to any water from dewatering activities being discharged in agreement with Lancashire County Council and / or the Environment Agency to a local drainage ditch or watercourse and / or spread over ground. It is considered that any dewatering in the location of Blackpool, Blackpool Airport Enterprise Zone and Blackpool Airport should be subject to agreement with the representatives of both Blackpool and Fylde Borough Council's drainage departments, given the potential implications to both authorities as administrative bodies and asset owners.

### ***Bathing Water***

10.2.7 Policy DM33 states that BBC will support schemes which improve bathing water quality or flood protection. Given the importance of tourism to the region it is important to the entire Fylde Coast that the quality of bathing water is not negatively affected, as it would have a measurable impact upon visitor numbers. This has been evidenced recently at Fleetwood when a sewage spill in June 2023 led to a temporary ban on bathing throughout the Blackpool coast. BBC is concerned that without further evidence, the activities involved in bringing the transmission cables onshore would cause some deterioration (potentially temporary) in the quality of bathing waters. The beach water is randomly sampled 20 no. times per year at various locations by the Environment Agency to determine the classification. There are a number of schemes in place, such as the Dunes Scheme, Turning Tides and Fylde Peninsula projects which support bathing water quality campaigns and promotion of the beach.

### **Mitigation / Adequacy of the DCO regarding impacts of flooding and drainage**

10.3.1 Access for BBC must be maintained to the coastal defences throughout the construction and lifespan of the Scheme to allow necessary annual inspections to continue to take place.

10.3.2 A Construction Surface Water Management Plan should be provided by the Applicant to identify how the proposals would prevent contamination of local watercourses during the construction and decommissioning stages. There would be a requirement for wheelwashing facilities during the construction and decommissioning stages.

10.3.3 In respect of the beach, BBC requires the Applicants to consider methodologies of construction to minimise the impact on bathing waters. Potential mitigation may include funding the Fylde Coast 'Turning Tides' group which oversees local response to bathing water quality to support a testing regime during the duration of the works. This is considered necessary as any reduction in bathing water quality would impact negatively upon visitor numbers and perception which may lead to fewer trips to the area and potential impacts upon the economy.

10.3.4 Further information is required to assess how the proposed development would interact with existing land uses and consequential impacts. Details of how land would be restored in respect of ground levels and materials should be provided to ensure that the operational and post-decommissioning periods of the Scheme would not have a detrimental impact upon flooding.

10.3.5 Protective provisions should be agreed regarding council owned drainage infrastructure.

## 11.0 LANDSCAPE

### 11.1 Policies

#### *National Policy Statements*

- 11.1.1 Paragraph 5.10.1 of EN-1 states that “the landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate”.
- 11.1.2 Landscape and visual effects of the Scheme’s construction, maintenance and any decommissioning are particularly relevant to this area of Blackpool given the location of the SSSI and the Airport.

#### *Blackpool Development Plan Policies*

- 11.1.3 **Policy CS7 (Quality of Design)** of the Core Strategy requires new development to be well designed and enhance the character and appearance of the local area. Development will not be permitted that causes unacceptable effects by reason of visual intrusion, overlooking, shading, noise and light pollution or any other adverse local impact on local character or amenity.
- 11.1.4 **Policy CS10 (Sustainable Design and Renewable and Low Carbon Energy)** of the Core Strategy seeks to mitigate the impacts of climate change, minimise carbon emissions and ensure buildings are energy efficient. Non-residential developments must follow the principle of the energy hierarchy.
- 11.1.5 **Policy DM17 (Design Principles)** of the Local Plan Part 2 requires all development to be of a high quality and should enhance and respond to any positive character of the local area.
- 11.1.6 **Policy DM19 (Strategic Views)** of the Local Plan Part 2 states that development should protect and enhance views of the following buildings and features of strategic importance: Blackpool Tower and along the seafront and coastline. Development that has a detrimental impact on these strategic views will not be permitted.
- 11.1.7 **Policy DM30 (Archaeology)** of the Local Plan Part 2 states that where there is knowledge of archaeological remains or reasonable grounds for the potential of archaeology, proposals will be expected to be accompanied by an assessment of the significance of any archaeology prior to the determination of an application for the site and how it will be affected by the proposed development.

## **11.2 Impacts Upon Landscape**

- 11.2.1 BBC are concerned about the potential impacts on the local landscape arising from the construction and restoration works. The removal and importation of material could have impacts both visually on the landscape but also on the condition of the ground and its ability to drain appropriately.
- 11.2.2 It is of importance to BBC that the Scheme does not detract from the landscape by way of unnecessary structures, with fencing and site compounds to be appropriately designed.
- 11.2.3 Given the extensive history of the Airport, there is potential that the Scheme will impact upon underground archaeological remains of interest in appreciating the development of aviation uses in this location.

## **11.3 Mitigation / Adequacy of DCO against Impacts on Landscape**

- 11.3.1 Detailed plans of the proposals and existing and proposed sections of the land to be altered should be provided for consideration. BBC consider that it may be necessary to enter into a legal agreement to confirm these details.
- 11.3.2 Details of construction fencing and structures should be provided to illustrate any potential impact upon the local landscape. Where areas are degraded due to the works they should be repaired to their existing condition post-works.
- 11.3.3 BBC welcomes the requirement for an archaeological written scheme of investigation to be prepared and submitted for approval. If this identifies any important features, site surveys should be carried out to ascertain whether any remains are present and recorded where appropriate. Should any unexpected remains be identified during the scope of works, these should be subject to an appropriate recording or protection if appropriate.



## 12.0 CONSTRUCTION MANAGEMENT PRACTICES

### 12.1 Policies

#### *Blackpool Development Plan Policies*

12.1.1 **DM36 (Controlling Pollution and Contamination)** of the Local Plan Part 2 states that development will be permitted where it can be demonstrated that the development:

a. will be compatible with adjacent existing uses and would not lead to unacceptable adverse effects on health, amenity, safety and the operation of surrounding uses and for occupants, users of the development itself or designated sites of importance for biodiversity, with reference to noise, vibration, odour, light, dust, other pollution or nuisance. Applications will be required to be accompanied, where appropriate, by relevant impact assessments and mitigation proposals.

b. In the case of previously developed, other potentially contaminated or unstable land, a land remediation scheme can be secured which will ensure that the land is remediated to a standard which provides a safe environment for occupants and users and does not displace contamination;

c. Will not give rise to a deterioration of air quality in the defined Air Quality Management Area in Blackpool Town Centre or result in the declaration of a new AQMA. Where appropriate an air quality impact assessment will be required to support development proposals;

d. Where development will result in, or contribute to, a deterioration in air quality, permission will only be granted where any such harm caused is significantly and demonstrably outweighed by other planning considerations and appropriate mitigation measures are provided to minimise any such harm.

e. Will not pose a risk of pollution to controlled waters (surface or ground water) and will, where required, include mitigation and/or remediation to prevent any unacceptable levels of water pollution.

### 12.2 Impacts of Construction Practices

12.2.1 Due to the extent and duration of the planned construction and decommissioning phases of work there is the potential for this to have significant effects upon the local population. This is as a result of the works plus the associated traffic movements. Understanding the duration and extent of the works is therefore fundamental to assessing the level of impacts. The cumulative nature of the works across Projects A and B and their potential impacts requires further consideration by the Applicants.

***Dust***

- 12.2.2 The construction and decommissioning stages of the Scheme have the potential to cause significant levels of dust, which can impact upon the operations of local services as well as severely impact human health.

***Noise***

- 12.2.3 The activities undertaken during the construction and decommissioning stages of the Scheme have the potential to result in significant noise levels. This would be exacerbated if work is carried out throughout the extended working hours set out within the Applicants submission. The working hours should be reduced to reflect the urban nature of the wider area. In line with codes of practice, machinery should be subject to noise abatement measures wherever possible.
- 12.2.4 Scenario assessments should consider a range of scenarios as the impacts created through maximum noise levels over one period and lower noise levels over a greater period of time, may create different impacts which require different mitigation.

***Lighting***

- 12.2.5 Artificial lighting provision through the construction and decommissioning stages of the Scheme may detrimentally impact local residents, biodiversity and operations at Blackpool Airport. Given the sensitive nature of receptors, full consideration would need to be given to the position and type of lighting proposed. Instances where night-time working would be required should be fully evidenced and put forward to the local authority for agreement at the earliest opportunity.

***Soil Contamination***

- 12.2.6 The movement of soil and groundworks have the potential to impact upon existing contamination or may result in contamination due to the type of works proposed. Measures should be in place to ensure no leaching of materials into the soil and that local waterways are appropriately protected. This is further complicated by the presence of a high water table in the local area and so the risk of this occurring needs to be clarified by the Applicant.

**12.3 Mitigation / Adequacy of DCO regarding impacts of construction practices**

***General Mitigation***

- 12.3.1 These matters will need to be consistently reviewed and managed throughout the construction and decommissioning phases, actively engaging with the relevant authorities, in determining appropriate mitigation where necessary. Flexibility should be included to allow mitigation to change based upon

current conditions. Consideration should also be given to the cumulative impact of these matters across all stages of the Scheme.

- 12.3.2 Details will need to be provided of any night-time working for consideration against the closest sensitive receptors. Pre-agreement would be required from the Council for any night-time works. Provision should also be made for advising local residents of such working and make available contact details for dealing with concerns throughout the duration of the Scheme.

***Lighting***

- 12.3.3 Details of any lighting required during any necessary night-time works and the location of such should be provided to enable consideration of impact on sensitive receptors, this should be agreed with the relevant local authority and other agencies, including Blackpool Airport.

***Soil Contamination***

- 12.3.4 Further detail should be provided on the requirements for soil removal and importation and the potential impacts of such. Consideration of dust and noise suppression and waste removal details should be set out within a Construction Management Plan.
- 12.3.5 Full ground investigations should be completed for land within the works plan boundary, to include for soil testing prior to works commencing.

## 13.0 MATTERS OF CLARIFICATION REQUIRED

- 13.1.1 Beyond the mitigation and detail requested within the preceding chapters of this report, the following clarification is also requested.
- 13.1.2 Clarity is required on the extent and necessity of the proposed temporary and permanent possession rights which are sought and the red line boundary. BBC require sufficient clarity to fully assess the proposals which may affect land, residents and operators within their borough. This includes circumstances of temporary interference, which would impact upon rights of access, such as to Starr Gate and the permanent sterilisation of land.
- 13.1.3 Further information is required from the Applicants pertaining to their proposed maintenance rights across the DCO limits for the duration of the Scheme. This should be strictly limited to the land which is wholly necessary to support the Scheme.
- 13.1.4 Construction hours set out within Article 14, Schedule 2A and 2B, require greater clarity regarding works within the extent of Blackpool Airport. This is to support suitable management of continuous Airport operations alongside the Scheme.
- 13.1.5 A detailed programme is required to provide certainty to BBC regarding the installation, connection, operational and decommissioning stages of the Scheme and their associated works and aim to reduce disruption in respect of the phasing of each element of the works.

## 14.0 DEVELOPMENT CONSENT ORDER

### 14.1 Introduction to Consideration of the dDCO

- 14.1.1 In this LIR BBC request amendments to the dDCO which are summarised below and reserve the right to request further amendments following engagement with the Applicants and to submit a comprehensive statement prior to Deadline 3.
- 14.1.2 It is not clear in the Explanatory Memorandum to the DCO or the Statement of Reasons the extent of the rights requested and associated reasoning for this request. Consequential result in the dDCO is that Schedules 7 and 8 are widely worded with insufficient certainty as to the actual works which intend to occur and necessity for such works. The uncertainty follows through in particular to the temporary rights requested in the dDCO, Articles 29 to 30. It is submitted that the consequential effect of this uncertainty is contrary to the tests of necessity and proportionality.

### 14.2 Amendments to the dDCO

- 14.2.1 Article 8: Statutory Nuisance is considered to be too wide in light of the location of the construction vehicles through residential areas, along Squires Gate Lane and the location of the construction compound on land known as Blackpool Airport. It is considered that in light of this location the Applicant should be held accountable in the normal way and not absolved of responsibility.
- 14.2.2 The seven year implementation period set out within the dDCO (Article 1, Schedule 2A and 2B) is excessive and creates uncertainty for BBC. This includes uncertainty and potential delays to future local authority led developments at and around Blackpool Airport. BBC suggest that this time period be reduced to five years, particularly as Projects A and B are likely to be implemented separately resulting in a long period of disruption to residents and businesses.
- 14.2.3 BBC have reviewed the approval of matters specified in the requirements in Schedule 12 of the dDCO and request that the timeframes are stopped for consultation to occur for a period of up to 21 days. The period of 21 days aligns with the consideration of planning applications in the Blackpool area.
- 14.2.4 The effect of 'Article 47 – inconsistent planning permissions' is considered to be inconsistent with the statutory powers of a Local Planning Authority. The Article seeks to curtail the effect of planning conditions placed on a planning permission on the land within the redline boundary by the Local Planning Authority which is inconsistent with the Scheme. Additionally, the power sought within this article is considered to be too wide given the amount of land located within the redline area which may be developed within the future.

- 14.2.5 The dDCO does not require decommissioning of the transmission assets and associated infrastructure and restoration of the land once the wind farms are no longer operating. Additionally, Requirement 16 refers to the restoration of land used temporarily (we assume the temporary possession rights) which may continue for a substantial and unquantified period of time. The likely impact is that the absence of any such requirements may impose expenditure by the local authorities which they are unable to afford. Particularly in respect of land in the ownership of BBC. Land on which construction compounds are to be temporarily required must be restored and roads fully sealed. The dDCO lacks any of these assurances and currently places this burden on the public purse.
- 14.2.6 In relation to sensitive sites, BBC considers that this could lead to permanent local impacts and give rise to specific policy conflicts and concerns.

***Traffic, Transport and Construction***

- 14.2.7 It should be highlighted that corrections are required to Schedule 3A, 3B, 4A and 4B within the dDCO. The first two entries of each are considered by BBC to be incorrect. The red edge identified on the Works Plan – Sheet 3 of 21, clearly illustrates that the signal junction and north side of Starr Gate and the beach access straddle Blackpool Borough Council and Fylde Borough Council boundaries. The area of the signalised junction is subject to a cross-boundary agreement and administered by Blackpool Borough Council. These schedules should be reviewed and updated where necessary.
- 14.2.8 BBC request that the rights set out within the dDCO in so far as they relate to Part 3 Streets being Articles 9 to 15 of the dDCO are reviewed to provide absolute certainty that the Local Highways Authority maintain the discretion required to discharge its statutory function. Discussions are requested with the Applicant to provide the required certainty.
- 14.2.9 Additionally, of concern is the effect of the provisions in Part 3 and the rights sought to be acquired on the Starr Gate accessway. It is requested that the possessory rights sought are removed and alternative, appropriate traffic management measures be put in place in collaboration with the Local Highways Authority pursuant to Article 15 of the dDCO. It is considered that the current rights sought are not necessary or proportionate, particularly in consideration of the adverse impact to the local and wider communities.
- 14.2.10 Construction hours set out within Article 14, Schedule 2A and 2B, require limitations regarding works within the extent of Blackpool Airport and if retained, Starr Gate accessway. This is to support suitable management of continuous Airport operations alongside the Scheme and ensure retention of the accessway for all users, particularly emergency services.

### ***Employment and Skills***

- 14.2.11 dDCO requirement 19 should be amended to include consultation with BBC alongside other authorities and provide greater certainty of delivery with specified timeframes and outcomes to be met. Any final Employment and Skills document should be subject to the Council's agreement rather than notification to ensure all relevant considerations have been addressed. BBC would also suggest that the requirements of the Plan be covered by a S106 agreement to ensure that they remain enforceable throughout the lifetime of the Scheme. Amendment is sought to the current drafting in the dDCO of requirement 19 to ensure greater certainty of delivery of apprenticeships and the use of local labour and businesses during the construction and operational periods.

### ***Flooding and Drainage***

- 14.2.12 Protective provisions are requested to specifically protect all BBC owned drainage infrastructure located within the redline boundary and construction routes.

### ***Aquacomms Infrastructure***

- 14.2.13 Protective provisions are requested to specifically protect and provide an indemnity in relation to all the aquacomms infrastructure located within the redline boundary and construction routes. Of most concern is that located along the Starr Gate accessway as this infrastructure is important to the Blackpool Airport Enterprise Zone.

### ***Blackpool Airport***

- 14.2.14 Protective provisions are requested to specifically protect all operations undertaken by Blackpool Airport, which includes defence and HM Coastguard. Whilst the defence do not have a permanent or temporary base at Blackpool Airport, the Airport is regularly used operationally as a destination for early pilot training flight exercises, approach exercises for larger Transport Aircraft as well as regular refuelling stops and passenger drop-off. The SAS have also based helicopters at the airport on several occasions when conducting training exercises. HM Coastguard regularly use Blackpool Airport for refuelling when on Irish Sea search and rescue missions, and the Police Aviation service helicopters use the airport for refuelling and have dispensation for out of hours operations.

## **14.3 Securing Mitigation through a S106 Agreement**

- 14.3.1 This LIR has highlighted where mitigation is requested by BBC from the Applicants, and BBC reserve the right to request amendments to the dDCO if mitigations in the form of a S106 agreement are not forthcoming from the Applicants.

- 14.3.2 It is the expectation of BBC that this would be secured through the Applicants entering into a S106 Agreement in respect of the following requirements. A S106 agreement is available to the Applicants and Councils through S104A of the Town and Country Planning Act 1990.
- 14.3.3 BBC would be involved with the discharge of requirements to ensure details submitted for approval are acceptable. To assist the Authority in providing the resourcing necessary to discharge these details and undertake monitoring responsibilities, BBC requests that the Applicants agree to financial compensation to pay for the discharge of these requirements either through funding of a consultant or an officer for the extent of the duration required.
- 14.3.4 The requirements of the Employment and Skills Statement should be monitored for the duration of the works. The cost associated with monitoring the outcomes would be secured through the S106 agreement. This would include timeframes and a firm commitment to the provision of the measures referred to in the plan.
- 14.3.5 Community benefits are to be discussed further with the Applicants. This approach has also been made to Fylde Borough Council. The community benefits sought by BBC include:
- a Skills and Employment Plan, to include timeframes and firm commitment to the provision of the measures referred to within the plan, social benefits, apprenticeships and connections for businesses, including use of the Blackpool & the Fylde College Lancashire Energy HQ to support the skills agenda
  - a financial contribution towards the 'Turning Tides' initiative
  - A local benefit fund to mitigate loss of access to vulnerable persons facilities which will occur within the sand dunes and open space areas and may occur due to the loss of access to St Annes beach
  - Temporary closure of access to the Squires Gate Lane / Clifton Road North roundabout would compromise access to private homes and potentially businesses, which would be particularly harmful during the summer and festival periods. Therefore, compensation is sought for those affected
  - Opportunities for the provision of lower cost power to the area, to compensate for general disruption, should be explored. This may comprise robust community reparations through an appropriate scheme or a financial contribution to a community fund. BBC seek a favourable power purchase agreement which would support the Silicon Sands developments centred on the Airport Enterprise Zone but extending along the entirety of the Fylde coast, that will provide employment diversification



14.3.6 The impact of construction / decommissioning traffic on the road network would need to be remediated through appropriate maintenance and repair. In line with the requested dilapidation surveys, monitoring of the impacts of the Scheme would be required, the associated cost should be secured through the S106 agreement. Any closure of the Starr Gate slipway access would require relocation and provision of facilities and even a temporary closure of Squires Gate Lane may compromise access to private homes or businesses, particularly during the summer and festival periods, therefore compensation is sought for those affected.

## 15.0 CONCLUSION

- 15.1.1 The NPS is clear that in considering the 'economic and efficient' approach a network project, such as this Scheme, must follow good design, avoidance and mitigation principles as referenced in EN-5. It is considered that the design of the Scheme lacks sufficient certainty and clarity to be assessed and determined against the NPS.
- 15.1.2 Additionally, in respect of the land rights sought, the tests of necessity, proportionality and certainty are not met. The rights as currently drafted are too wide and unable to be clearly determined for any relevant assessment to occur.
- 15.1.3 Due to the lack of detail and following the precautionary principle, adverse effects on the continued and uninterrupted operation and therefore integrity of Blackpool Airport as a result of the energy infrastructure development cannot be ruled out.
- 15.1.4 BBC consider that further engagement may assist to overcome these impediments and look forward to greater clarity and therefore certainty being provided together with a proper package of mitigations. BBC remain supportive of green energy infrastructure located within its area.

## APPENDIX 1 – BLACKPOOL DEVELOPMENT PLAN POLICIES

### 3. Spatial Vision and Objectives

#### Presumption In Favour of Sustainable Development

3.8 The Core Strategy conforms to the National Planning Policy Framework (NPPF)<sup>21</sup>. Paragraph 15 of the NPPF requires Local Plans to be *'based upon and reflect the presumption in favour of sustainable development with clear policies that will guide how this will be applied locally'*. Local Authorities are required to include a suitable policy that highlights the presumption in favour of sustainable development. This is set out in Policy NPPF1 opposite, which is in accordance with the model policy provided by the Planning Inspectorate.

#### Policy NPPF1: Presumption In Favour Of Sustainable Development

1. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
2. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise - taking into account whether:
  - a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - b. Specific policies in that Framework indicate that development should be restricted.

<sup>21</sup><https://www.gov.uk/government/publications/national-planning-policy-framework-2>

## 5. Core Policies

### Economic Development and Employment

**5.26** Whilst the visitor economy will continue to underpin Blackpool's economy and remains an important growth sector (Chapter 7), to strengthen economic prosperity there is a recognised need to support new business growth and secure sustainable investment that will provide jobs in other employment sectors. In particular, by growing those sectors that already have a strong foothold in the Fylde Coast and by encouraging other emerging key growth sectors.

**5.27** To ensure employment opportunities benefit Blackpool residents it is important that the local people have the skills necessary to access future jobs. Equally, an improving skills profile will help to encourage new and expanding businesses to invest in the area.

#### Policy CS3: Economic Development and Employment

1. Sustainable economic development will be promoted to strengthen the local economy and meet the employment needs of Blackpool and the Fylde Coast Sub-Region to 2027, with the focus on:
  - a. Safeguarding around 180 hectares of existing industrial/business land for employment use; and enhancing these sites with new employment development on remaining available land and through opportunities for redevelopment
  - b. Promoting office development, enterprise and business start-ups in Blackpool Town Centre including the Central Business District
  - c. Promoting land in South Blackpool as a strategic priority, to help strengthen the Fylde Coast economy and make an important contribution towards meeting the future employment needs of Blackpool residents
2. To improve employment opportunities for Blackpool residents the focus will be to:
  - a. Develop and deliver an effective skills agenda to ensure local people have the necessary skills; improve aspirations and opportunities for people to move into work; and retain skilled people in Blackpool
  - b. Secure inward investment into Blackpool including Public Sector and Government Department relocation opportunities
  - c. Nurture and support responsible entrepreneurship by facilitating a culture of enterprise and promoting Blackpool as a great place for start-up businesses

## 5. Core Policies

### Connectivity

**5.62** A sustainable and efficient transport network is vital for Blackpool's economic prosperity and social and environmental well-being. Transport infrastructure needs to support economic priorities and effectively integrate with future development to reduce the need to travel, making it convenient, affordable and safe for residents to access jobs and services.

**5.63** Fast, convenient access to the resort and high quality infrastructure and an efficient network within the town is also essential to support a sustainable economy, by encouraging visitors to access and enjoy the tourism and cultural offer as well as businesses to invest. The quality of arrival, clarity of signage, ease and legibility of movement through the town is important in providing a positive experience for visitors, particularly in the town centre and resort core, whilst encouraging more sustainable travel.

**5.64** Blackpool Council works jointly with Fylde and Wyre Borough Councils and Lancashire County Council to address strategic challenges to improve the economic competitiveness of the sub-region. The Local Transport Plan will play an important part in addressing these strategic challenges and delivering improvements to the strategic transport network.

#### Policy CS5: Connectivity

A sustainable, high quality transport network for Blackpool and a quality arrival experience will be achieved by the following measures:

1. The provision of a modern, frequent, convenient and well-integrated **public transport** network by:
  - a. Working with Network Rail and operators to:
    - i. facilitate increased rail capacity and frequency on the Blackpool – Preston – Manchester line and new services including direct services to major destinations;

- ii. upgrade the South Fylde line, increasing capacity and frequency of services; and
    - iii. provide major enhancement of all rail arrival points, particularly Blackpool North Station.
  - b. Providing a new tram link from the promenade to Blackpool North Station and maintain options to link the tram network to the South Fylde Line.
  - c. Working with bus operators and developers to provide enhanced bus services with efficient, comprehensive routing served by high quality infrastructure, providing bus priority measures where appropriate to enable services to operate efficiently.
  - d. Working with coach operators and developers to provide sufficient, high quality, conveniently located coach passenger facilities and coach parking.
2. Encouraging integration of **Blackpool Airport** with public transport modes, enabling efficient passenger connections and onward journeys to and from the town and wider airport catchment; and supporting improvements to airport parking and the expansion of routes.
  3. Improving **interchange** between transport modes by providing improved high quality infrastructure including buildings, facilities and public realm, making transport interchange easy and convenient for all users.
  4. Reducing **road** congestion by eliminating identified 'pinch-points'; providing long-term solutions to structural issues where these arise at bridges and other infrastructure assets; and providing advanced directional signage on all main routes.

## 5. Core Policies

5. Addressing **parking** capacity issues by providing sufficient, high quality and conveniently located car parks, to support the town centre and resort economy and address wider issues of parking provision across the Borough.
6. Developing a safe, enhanced and extended network of **pedestrian and cycle** routes to increase the proportion of journeys made on foot or bike by:
  - a. Connecting neighbourhoods with the town centre, district and local centres, employment sites and community facilities, green spaces and adjoining countryside;
  - b. Providing the town centre and resort core with new and improved convenient pedestrian and cycle links between main car parks, transport hubs, major attractions and development sites; and
  - c. Providing suitable levels of secure cycle parking at new developments and public transport hubs as well as links to existing networks, where feasible.
7. Providing improved, clear and co-ordinated **signage** for all transport modes and visitor information, particularly within the town centre and resort core, to ease movement and provide a clear sense of orientation and direction.
8. **Changing travel behaviour** by pro-actively working with developers and other organisations to increase the proportion of journeys that use sustainable transport, while working with residents and businesses to reduce the need for work related journeys where alternative means or technologies make this possible.

5.65 The overarching strategy focus on regeneration of the town centre and resort core will ensure future development comes forward in locations that improve opportunities for sustainable travel between homes and jobs and reduce regular car journeys, to help manage congestion and minimise future greenhouse gas emissions. It will also provide opportunities to improve the quality of arrival and reduce cross town vehicle movements.

5.66 New development should prioritise ease of access to sustainable transport modes, including walking and cycling. Opportunities to improve connectivity in South Blackpool, with supporting growth which promotes sustainable development and travel, are addressed in Policy CS27: South Blackpool Transport and Connectivity.

5.67 With Blackpool's compact urban form, this will enable closer integration of high quality air, bus, rail and tram services/infrastructure which, along with an enhanced pedestrian environment, will make travel by public transport, cycling and walking safer and more attractive to residents and visitors. A sustainable transport system will integrate available modes of transport and make passenger transfer between them as simple and convenient as possible.

5.68 Public transport should be frequent, good quality and convenient to be a realistic and preferred option over the car for both residents and visitors. Achieving this will also require improvements to key transport interchanges including Blackpool North and South railway stations, the bus infrastructure, and Lonsdale Road Coach Station (or any replacement).

5.69 With the low rate of car ownership in Blackpool a significant proportion of residents are dependent on public transport and there is a need to maintain and strengthen this service within the Borough. Neighbourhoods should also be connected by attractive and safe pedestrian and cycle routes to encourage walking and cycling.



## 5. Core Policies

### Green Infrastructure

**5.92** *Green infrastructure is 'the network of natural environmental components and green and blue spaces that lies within and between cities, towns and villages which provides multiple social, economic and environmental benefits'<sup>20</sup>. The physical components of green infrastructure can range from large-scale areas of public open space such as coastal habitats and countryside areas to smaller scale provision in the form of street trees, allotments and Sustainable Drainage Systems (SuDs). Green infrastructure can also include hard-landscaped areas, such as Blackpool's promenade, which forms an integral part of the town's green infrastructure network.*

**5.93** *Green infrastructure supports regeneration, adds to the attractiveness of the town as a place to invest, and makes a vital contribution to the health and well-being of residents and visitors. Networks of green infrastructure can safeguard valued landscapes, link habitat and biodiversity networks, protect and improve water quality (including bathing waters), and mitigate the impacts of climate change by reducing the urban heat island effect and attenuating flood risk. The following policy therefore aims to protect, enhance, expand and connect green infrastructure and ecological networks in Blackpool.*

#### Policy CS6: Green Infrastructure

1. High-quality and well connected networks of green infrastructure in Blackpool will be achieved by:
  - a. **Protecting** existing green infrastructure networks and existing areas of Green Belt. The loss of green infrastructure will only be acceptable in exceptional circumstances where it is allowed for as part of an adopted Development Plan Document; or where

provision is made for appropriate compensatory measures, mitigation or replacement; or in line with national planning policy.

In terms of existing open space, sports and recreational buildings and land, including playing fields, these will be protected unless the requirements of paragraph 74 of the NPPF are met.

In terms of Green Belt areas, the Council will apply national policy to protect their openness and character, and retain the local distinctiveness. There is no planned strategic review of the existing Green Belt boundary during the plan period.

- b. **Enhancing** the quality, accessibility and functionality of green infrastructure and where possible providing net gains in biodiversity.
  - c. **Creating** new accessible green infrastructure as part of new development and supporting urban greening measures within the built environment.
  - d. **Connecting** green infrastructure with the built environment and with other open space including the creation, extension or enhancement of greenways, green corridors and public rights of way.
2. All development should incorporate new or enhance existing green infrastructure of an appropriate size, type and standard. Where on-site provision is not possible, financial contributions will be sought to make appropriate provision for open space and green infrastructure.

<sup>20</sup> Taken from North West Green Infrastructure Guide (2008)



## 5. Core Policies

3. International, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary.

### Protecting Green Infrastructure

5.94 The intensely urban nature of Blackpool and limited areas of open countryside increase the importance of balancing the requirement for new development with the need to protect valued landscapes, biodiversity and green infrastructure networks (as set out in Figure 7: Blackpool's Existing Green Infrastructure). This also means opportunities to create new public open space in Blackpool are constrained. Therefore the focus of the policy is to protect, improve and enhance existing provision and where possible, support the creation of new green infrastructure, as well as the innovative use of space including the transformation of underused or derelict space.

5.95 Due to the urban and compact form of the Borough, a number of important designations exist beyond the built-up area. This includes Green Belt land, which has an important role in safeguarding the countryside from encroachment, preventing Blackpool merging with neighbouring settlements and assisting in urban regeneration. The current Green Belt land in Blackpool will therefore continue to be protected by restricting the type of development here to retain its open and locally distinctive character, in line with the National Planning Policy Framework (NPPF). There is no planned strategic review of the Green Belt boundary over the plan period.

5.96 In terms of other Green Infrastructure assets, the starting point for future development plan documents will be to avoid the loss of these where possible. However,

this will need to be in the context of addressing the competing demands on Blackpool's limited remaining developable land. A careful balance has to be struck which enables the provision of high quality networks of green infrastructure alongside the delivery of development to meet Blackpool's wider housing, employment and infrastructure requirements. In some circumstances, this may require the development of greenfield sites. During the process of allocating land as part of the Site Allocations document, the Council will have regard to the requirement of the NPPF to 'allocate land with the least environmental or amenity value' (paragraph 110).

5.97 The integration and protection of green infrastructure is particularly important in parts of the Borough where access to open space is more limited, this will help to address identified deficiencies and bring about environmental, social and economic improvements. Green infrastructure has an important role in 'climate proofing' urban areas by enabling communities to adapt to climate change by providing shade and cooling in the summer, insulation in the winter and by mitigating risks posed by flooding and air pollution. There are also clear links between green infrastructure and the health and well-being of communities.

5.98 Easy access to good quality green space and infrastructure can provide benefits such as increased life expectancy and reduced health inequalities, improvements in levels of physical activity and health, and the promotion of psychological health and mental well-being<sup>21</sup>. Furthermore, evidence suggests that investment in green infrastructure can also have a positive impact on economic regeneration, particularly in relation to inward investment, new business start-ups and job creation. The benefits of green infrastructure need to be harnessed across the Borough, but particularly in the most deprived neighbourhoods of Blackpool where there is a need to address the current concentrated levels of deprivation and health inequalities experienced in these areas.

<sup>21</sup> Report by Forest Research as part of the Urban Regeneration and Greenspace Partnership (2010), 'Benefits of green infrastructure'

## 5. Core Policies

### Quality of Design

**5.116 High quality design is central to the creation of attractive, successful and sustainable places, which in turn has a positive effect on the health and well-being of the communities who live there. The Council expects high quality, well designed developments that contribute positively to the character and appearance of the local, natural and built environment.**

#### Policy CS7: Quality of Design

1. New development in Blackpool is required to be well designed, and enhance the character and appearance of the local area and should:
  - a. Be appropriate in terms of scale, mass, height, layout, density, appearance, materials and relationship to adjoining buildings
  - b. Ensure that amenities of nearby residents and potential occupiers are not adversely affected
  - c. Provide public and private spaces that are well-designed, safe, attractive, and complement the built form
  - d. Be accessible to special groups in the community such as those with disabilities and the elderly
  - e. Maximise natural surveillance and active frontages, minimising opportunities for anti-social and criminal behaviour
  - f. Incorporate well integrated car parking, pedestrian routes and cycle routes and facilities
  - g. Provide appropriate green infrastructure including green spaces, landscaping and quality public realm as an integral part of the development
  - h. Be flexible to respond to future social, technological and economic needs.

2. Development will not be permitted that causes unacceptable effects by reason of visual intrusion, overlooking, shading, noise and light pollution or any other adverse local impact on local character or amenity.
3. Contemporary and innovative expressions of design will be supported, where appropriate.

**5.117 High quality design is integral to the success of Blackpool as a place to live, work, visit and invest. There is a clear need to promote high standards of design across the town. Blackpool's buildings, streets, and spaces must be attractive, safe and enjoyable.**

**5.118 Successful places have a well connected, visually interesting and varied network of buildings, streets and spaces. These are vital in promoting community cohesion and civic pride. It is important that all new development takes account of layout, density, appearance, materials and landscaping in order to be sympathetic to their location.**

**5.119 The need to drive up standards in Blackpool is paramount. New high quality landmark schemes provide positive reference points and promote further enhancement. A number of recent developments have put design excellence first including the new Promenade, Festival House and St. Johns Primary School. These have set a benchmark for high quality design. The Council promotes the use of Design Review Panels to improve the design quality of major projects.**

## 5. Core Policies

### Water Management

**5.132** Blackpool is an area of relatively flat, low lying land that is protected from coastal erosion and tidal inundation by modern sea defences and a number of smaller inland defences. In general, risk of flooding from rivers (fluvial) and coastal waters (tidal) across the Borough is relatively low; however, there are known issues in relation to surface water flooding, the capacity of the combined sewer network and bathing water quality.

**5.133** The risk of flooding is influenced by physical factors such as the relief of the land, but also factors such as climate change and human activities. Rising sea levels and more frequent and intense storm events are increasing the risk of flooding, particularly in a coastal location such as Blackpool. It is important that any new development is appropriately flood resilient and resistant, provides necessary protection for existing and future users, and will not increase the overall risk of flooding.

#### Policy CS9: Water Management

1. To reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change, all new development must:
  - a. Be directed away from areas at risk of flooding, through the application of the Sequential Test and where necessary the Exception Test, taking account of all sources of flooding;
  - b. Incorporate appropriate mitigation and resilience measures to minimise the risk and impact of flooding from all sources;
  - c. Incorporate appropriate Sustainable Drainage Systems (SuDS) where surface water run-off will be generated;
  - d. Where appropriate, not discharge surface water into the existing combined sewer network. If unavoidable, development must reduce the volume of surface water run-off

discharging from the existing site in to the combined sewer system by as much as is reasonably practicable;

- e. Make efficient use of water resources; and
  - f. Not cause a deterioration of water quality.
2. Where appropriate, the retro-fitting of SuDS will be supported in locations that generate surface water run-off.

**5.134** The National Planning Policy Framework and Planning Practice Guidance states new development should be directed away from areas at risk of flooding from all sources, including tidal, fluvial, surface water, sewer, groundwater flooding and reservoir failure.

**5.135** The main risks of flooding in Blackpool are from surface water and capacity constraints in the sewer network. The combined sewer system handles both rainwater and sewage and can be overloaded during periods of prolonged heavy rain causing the system to discharge excess rainwater and sewage into the sea. Maintaining bathing water quality, while keeping the town safe from flooding, is a key priority for the council, who are working with other public and private sector organisations to ensure that this is the case.

**5.136** The European Union's revised Bathing Water Directive (2006/7/EC) came into force in March 2006 and will be implemented in England and Wales by the Bathing Water Regulations 2013. It has the overall objective to protect public health and the environment by improving the quality of bathing waters. The revised directive has more stringent water quality standards, a stronger beach management focus and new requirements for the provision of public information. It is therefore important that any new development does not cause deterioration in water quality which could impact on the Fylde Coast bathing waters. There are eight designated bathing waters along the Fylde Coast,



## 5. Core Policies

### Sustainable Design and Renewable and Low Carbon Energy

5.148 The Climate Change Act (2008) introduced legally binding targets to reduce UK carbon emissions by at least 80% by 2050 compared to 1990 levels. In order to help meet this target local authorities are required to reduce carbon emissions. These reductions are ambitious and building the infrastructure to deliver them will require taking an early lead to achieve the target in a cost effective way. Sustainable design and construction and the use of renewable and low carbon energy are key to achieving a reduction in carbon emissions.

5.149 To mitigate the impacts of climate change, renewable and low carbon energy will play an increasingly important role in the supply of energy. Furthermore, the generation of renewable and low carbon energy will reduce the effects of rising energy prices and reliance on imported and finite (non-renewable) fossil fuels, improve community health and well-being, create more desirable homes and places to live, and stimulate investment in new jobs and businesses.

5.150 The Government's Ministerial Statement dated 25th March 2015 announced the approach to energy performance requirements for new dwellings. This matter will be dealt with through the Building Regulations process.

#### CS10: Sustainable Design and Renewable and Low Carbon Energy

1. To mitigate the impacts of climate change, minimise carbon emissions and ensure buildings are energy efficient, non-residential developments must follow the principle of the energy hierarchy, which is to:
  - a. Reduce the need for energy by taking all reasonable steps to locate and orientate buildings to incorporate passive environmental design for heating, cooling, ventilation, and natural day-lighting;

- b. Minimise energy use by ensuring appropriate energy efficient measures are integral to development proposals;
  - c. Investigate opportunities to include renewable and low carbon energy provision.

2. The development of renewable, low carbon, or decentralised energy schemes, excluding wind turbines will be supported where proposals:
  - a. Are located appropriately and do not cause an unacceptable impact on surrounding uses or the local environment, landscape character or visual appearance of the area, taking into account the cumulative impact of other energy generation schemes; and
  - b. Mitigate any potential noise, odour, traffic or other impacts of the development so as not to cause an unacceptable impact on the environment or local amenity.
3. For development involving one or more wind turbine, planning permission will only be granted where:
  - a. the development site is in an area identified as suitable for wind energy development in the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies DPD and;
  - b. following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.
4. All new non-residential development over 1,000m<sup>2</sup> will be required to achieve BREEAM 'very good' (or any future national equivalent)

## 5. Core Policies

### Planning Obligations

#### Policy CS11: Planning Obligations

1. Development will only be permitted where existing infrastructure, services and amenities are already sufficient, or where the developer enters into a legal undertaking or agreement to meet the additional needs arising from the development.
2. Where appropriate, planning contributions will be sought in connection with a development to ensure that:
  - a. The particular facilities required for the proposed development, including the provision of necessary infrastructure, services and community facilities are met
  - b. Any damaging impact on the environment or local amenity arising from the proposed development can be overcome.

5.162 The Council works with other infrastructure providers, including the Highways Agency, United Utilities and the Environment Agency, to develop an understanding of existing infrastructure provision and future requirements as well as funding sources and responsibility for delivery. The most up-to-date position is reflected in the Infrastructure and Delivery Plan which accompanies the Core Strategy. In addition, the Council works with neighbouring authorities to take account of the need for/support the delivery of sub-regional infrastructure, particularly in relation to developments close to the Blackpool boundary.

5.163 Infrastructure is key to the delivery of sustainable development, economic growth and the development needs of the Borough. The Council will ensure that new developments provide the necessary physical, community and green infrastructure to meet local needs and achieve sustainable development, and do not result in infrastructure deficiencies or exacerbate other problems. The impact of all development proposals will need to be fully assessed and where developments have potentially significant implications on infrastructure, applicants will be required to submit assessments in support of their development proposal.

5.164 Where development proposals give rise to additional social, environmental and infrastructure costs, they will be subject to conditions attached to planning permissions and/or planning obligations as appropriate, to mitigate the impacts of the development and make it acceptable in planning terms.



## 7. Regenerating Blackpool Town Centre and Resort Core

### Leisure and Business Tourism

7.27 If Blackpool is to build on its status as Britain's favourite seaside resort it needs to provide new high quality attractions and accommodation, which will help to broaden the resort's appeal alongside investment in key existing leisure and entertainment landmarks. These together will create more repeat visits and encourage new visitors to the resort year round, revitalising the visitor economy and positioning Blackpool at the forefront of the tourism market.

#### Policy CS21: Leisure and Business Tourism

1. In order to physically and economically regenerate Blackpool's resort core and town centre, the focus will be on strengthening the resort's appeal to attract new audiences year round. This will be achieved by supporting:
  - a. Proposals for new high quality tourism attractions focused on the town centre and resort core, including major development opportunities which have the potential to become wider catalysts for regeneration to improve the visitor experience
  - b. Proposals for new visitor accommodation focused on the town centre, resort core and defined holiday accommodation areas, unless exceptional circumstances justify a peripheral location outside these areas
  - c. The improvement and enhancement of important existing tourist attractions
  - d. The improvement of existing holiday accommodation and giving marginal, lower quality guesthouses the opportunity to convert to high quality residential accommodation outside the defined holiday accommodation areas.

- e. New development along the promenade's built frontage which complements the high quality public realm investment along the promenade to enhance the appearance of Blackpool's seafront
- f. The enhancement of existing and promotion of new venues and events spaces which can accommodate a year round programme of events, festivals and conferences.

2. Elsewhere, outside the resort core and town centre, the Council will support new tourism investment that is predominantly focused on existing outdoor leisure and recreation facilities which strengthens the wider resort offer and does not undermine resort regeneration.

7.28 There is an overriding need to raise quality in all aspects of the visitor experience in Blackpool, focusing investment and development within the established resort core and town centre, where regeneration and positive change is most needed.

7.29 Opportunities for major new high quality leisure development drawing large numbers of visitors and making a strong contribution to resort regeneration are key to developing an exciting and unique year round resort destination and supporting a sustainable economy.

7.30 This policy seeks to target leisure tourism investment and development in the resort core and town centre. Proposals for resort attractions elsewhere will generally not be permitted. In terms of new hotel accommodation, development of peripherally located hotels has prospered in many areas in recent years but in Blackpool, unless there is a specific identified need for ancillary accommodation to other facilities, there is no basis to justify further accommodation outside the defined holiday accommodation areas, resort core and town centre.



## 7. Regenerating Blackpool Town Centre and Resort Core

### Key Resort Gateways

7.36 Blackpool has a number of key resort gateways leading into the town centre and resort core, presenting many visitors with their first impression of the resort. Improvement and enhancement of these key visitor routes will help to create a positive resort arrival experience, complement regeneration efforts elsewhere within the resort and stimulate further investment in the adjoining holiday and residential areas. Creating a positive arrival experience is also dealt with in Policy CSS: Connectivity.

#### Policy CS22: Key Resort Gateways

1. Proposals will be promoted and pursued for further improvement, remodelling and environmental enhancement of Central Corridor as a key strategic gateway to Blackpool and attractive point of arrival, including:
  - a. Redevelopment of land within and adjoining the Corridor which creates attractive development frontages viewed from the Corridor;
  - b. Improved vehicular, pedestrian and cycling linkages through the Corridor and extending the network of green infrastructure;
  - c. Improved parking and reception facilities;
  - d. Enhanced landscaping, signage, lighting and security.
2. Proposals for improvement and development will be supported to regenerate Central Drive, Lytham Road, Dickson Road and Talbot Road as prominent and attractive gateways to the resort and town centre, including:
  - a. Replacing existing poor quality, seasonal and transient uses with more viable uses, including quality residential uses on those frontages outside a defined retail centre;

- b. Improvements to buildings and shop frontages;
  - c. High quality public realm, landscaping, signage, lighting and security;
  - d. Traffic calming and improved public transport, pedestrian and cycling provision.
3. To facilitate major redevelopment schemes assistance will be provided to assemble sites and properties where appropriate.
4. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips.

7.37 Central Corridor (including Seaside Way and Yeadon Way) is the key strategic gateway to the resort for car and coach-borne visitors, providing direct access from the M55 motorway. It is flanked by the main visitor car and coach parks, Blackpool South Railway Station, Blackpool Football Club and the Festival Leisure Park (accessed from Rigby Road). Major projects between Blackpool Football Club and Waterloo Road bridge (completed in phases between 2006 and 2009) have introduced new network remodelling, public realm improvements, public open space and new car parks, which have greatly improved the arrival experience. However, the remaining sections of the Corridor provide a visually poor and bland environment and similar treatment is required north of Sands Way roundabout and South of Waterloo Road Bridge to create the quality of 'arrival experience' needed and improve connections through the Corridor and beyond.

## 8. Enabling South Blackpool Growth and Enhancement

### South Blackpool Employment Growth

**8.7** The Core Strategy evidence base identifies lands at South Blackpool on the Blackpool/Fylde boundary as the most appropriate location to attract major new economic development, providing sustainable jobs for Fylde Coast residents and supporting sub-regional employment growth. This includes redevelopment opportunities on existing employment sites within Blackpool as well as new development on wider land in neighbouring Fylde.

**8.8** Due to Blackpool's limited land availability, the overarching policy for economic development (Policy CS3) also identifies lands at South Blackpool as being important to meet the future employment needs of Blackpool residents to help strengthen and grow the local economy, complementing employment development within Blackpool Town Centre and existing employment sites elsewhere in the Borough. Lands at South Blackpool will be essential in attracting significant inward investment providing the opportunity for larger, more attractive development for businesses which cannot be readily accommodated elsewhere.

**8.9** Therefore, Blackpool Council will work jointly with neighbouring authorities to promote sustainable locations within South Blackpool to support business and industrial growth for Blackpool and the Fylde Coast sub-region. The following policy provides detail on which locations are considered most sustainable for new employment development and which are in line with the strategic priorities being pursued through the Duty to Co-operate.

#### Policy CS24: South Blackpool Employment Growth

The Council will support:

1. Redevelopment of existing employment sites within South Blackpool to provide high quality modern business/industrial facilities (Class B uses)
2. Proposals for major new business/industrial development (Class B uses) in principle at sustainable locations within wider lands at South Blackpool to support sub-regional economic growth, including:
  - a. Blackpool Airport Corridor
  - b. Lands close to Junction 4 of the M55

#### Blackpool Airport Corridor

**8.10** Blackpool Airport Corridor forms an important southern gateway to Blackpool, and includes Blackpool Business Park, Squires Gate Industrial Estate and Sycamore Trading Estate within the Blackpool boundary. Parts of Blackpool Business Park are within neighbouring Fylde, along with Blackpool Airport which also forms part of the Airport Corridor. With direct links to the M55 via Progress Way, the sites have been a prime location for much of Blackpool's recent industrial and business development.



## 8. Enabling South Blackpool Growth and Enhancement

### South Blackpool Transport and Connectivity

**8.30** To ensure new residential and employment development within South Blackpool is sustainable, it will require integration with the wider area through the provision of a network of pedestrian, cycle and public transport routes. This provision will enable effective connections and encourage sustainable travel for local journeys to schools, shops, jobs and community facilities located within these areas.

#### Policy CS27: South Blackpool Transport and Connectivity

1. Development proposals in South Blackpool will be required to prioritise sustainable modes of transport between homes, jobs and supporting community facilities.
2. Convenient access to public transport and improved pedestrian and cycle infrastructure are required to support major housing and employment growth in this area. This includes:
  - a. linking to and extending the existing network of routes within and to/from the area;
  - b. creating direct rapid transport connections with the town centre and employment areas;
  - c. preparing, implementing and monitoring Travel Plans;
  - d. improved access and parking for Blackpool Airport and improved links between the airport and sustainable modes of transport.

**8.31** The South Blackpool employment and housing growth areas (Figure 18) have convenient access to the M55 and Blackpool Airport. However, access to and from the wider Blackpool area can be poor and lacks sustainable travel connections. There is potential for significant improvements to promote sustainable travel movements and enable sustainable growth in South Blackpool.

**8.32** The strategy focus on supporting growth in South Blackpool provides opportunities for improved connectivity. Development on lands close to Junction 4 of the M55 and along the Airport Corridor would improve the viability of sustainable transport links and drive investment, reducing congestion in the area and reliance on car use.

**8.33** A network of cycle/pedestrian routes is needed to integrate new developments to adjoining areas of Blackpool and surrounding districts. Several bus routes already serve the area, but services are poor to and from the main employment areas on the Blackpool/Fylde boundary and within Marton Moss. More frequent, reliable and extended services are needed to maximise bus patronage to and from these areas. There is the potential to promote sustainable travel patterns for residents with high speed public transport links to Blackpool Town Centre and Lytham St Annes. There are also opportunities to upgrade the South Fylde rail line and integrate this with the tram network, creating a direct, convenient and efficient transport link between South Blackpool and the Fylde Coast area.

**8.34** Any development that will generate significant amounts of transport movement will require a Travel Plan, setting out a continuing process for promoting and increasing use of sustainable transport modes.

**8.35** Lands in South Blackpool present opportunities to improve access, parking and public transport links to Blackpool Airport to encourage its integration with the wider area. The Council will also work with the airport owners to support the expansion of routes (Policy CS5).

**8.36** Blackpool Council continues to work with neighbouring authorities on strategic transport issues through the Duty to Co-operate. The Fylde Coast Transport Masterplan is being prepared by Lancashire County Council in association with Blackpool, Fylde and Wyre Councils and sets out the sub-regional transport priorities over the plan period.

## Economy

### Provision of Employment Land and Existing Employment Sites

3.82 Policy CS3 of the Core Strategy identifies the requirement to safeguard around 180 hectares of existing business/industrial land for Use Class B2, B8 and E(g) employment use. In addition, the policy promotes enhancement of these sites with new B and E(g) Class employment development on remaining available land and through opportunities for redevelopment. These areas are identified on the Policies Map.

3.83 In support of Policy CS3, Policy DM7 provides detail on the appropriate use classes within these identified business/industrial areas.

#### Policy DM7: Provision of Employment Land and Existing Employment Sites

- Proposals for new development or redevelopment of existing premises will be permitted in accordance with the specified uses for each employment area as identified on the Policies Map:

Employment Area	Available Land (Ha) (as at March 2021)	Appropriate Use Classes
Blackpool Airport Enterprise Zone <sup>11</sup>	14.15	B2, B8, E(g)
Vicarage Lane	0.02	B2, B8, E(g)
Clifton Road	2.5	B2, B8, E(g)
Preston New Road (NS&I)	0	E(g)
Chiswick Grove	0	B2, B8, E(g)
Mowbray Drive	0.3	B2, B8, E(g)
Devonshire Rd / Mansfield Rd	0	B2, E(g)
Moor Park	0	B2, B8, E(g)
North Blackpool Technology Park	2	B2, B8, E(g)
Warbreck Hill	0	E(g)(i)
Total	18.97	

- Proposals for non B and E(g) uses will not be permitted except for those which are in accordance with Policy DM8: Blackpool Airport Enterprise Zone.

<sup>11</sup> Incorporates Blackpool Business Park; Squires Gate Industrial Estate and Sycamore Estate.

3. Employment land at the Blackpool Airport Enterprise Zone includes around 9 hectares released from the Green Belt justified by exceptional circumstances in line with NPPF (2021) Paragraph 140.

3.84 The main industrial/business areas identified in the policy provide a range of employment related uses that make an important contribution to Blackpool's employment offer and the local economy and will be retained as safeguarded employment land. Proposals for non-B or E(g) uses will not be permitted. The only exception to this is at the Enterprise Zone for proposals that accord with policy DM8.

3.85 The Core Strategy sets out the requirement for 31.5 hectares of new employment land over the plan period from 2012 to 2027. The sites to meet this need are included in this policy<sup>12</sup>. The Employment Land Update 2021 and Blackpool Airport Enterprise Zone Topic Paper (Feb 2022) recognises that significant safeguarded employment land has been developed for alternative uses since the start of the plan period. Furthermore, employment land take-up during this time has been around half of what was expected (0.62 ha per annum compared to 1.2 ha per annum).

3.86 Taking account of the above, around nine hectares of additional employment land is identified at the Blackpool Airport Enterprise Zone which compensates for the loss of less attractive employment land and will stimulate an increase in annual employment land uptake by providing attractive and accessible employment land in the Blackpool Airport Enterprise Zone. Robust justification for the additional employment land facilitated by the release of around 9ha of land from the Green Belt is set out in the Employment Land Update 2021 and Blackpool Airport Enterprise Zone Topic Paper (Feb 2022).

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<sup>12</sup> Along with around 14 hectares of employment land in Fylde provided through the Duty to Co-operate and acknowledged in the adopted Fylde Local Plan (2018)

transportation to key energy generation sites in the Irish Sea as well as being home for some 260 existing businesses including the Lancashire Energy HQ - a training base for the energy sector.

3.90 The following policy relates to land within Blackpool's administrative boundary; and protects the designation of the site supporting the delivery of the EZ.

#### **Policy DM8: Blackpool Airport Enterprise Zone**

1. That part of the boundary of Blackpool Airport Enterprise Zone (EZ) which lies within Blackpool Borough is identified on the Policies Map.
2. The Council supports the sustainable development of the EZ to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution to national growth. In supporting development at the EZ, the viable long term operation of Blackpool Airport must be maintained.
3. The overall delivery of the EZ is guided by a masterplan, informed by local plan policy and establishing the development and design framework for the site determining the appropriate mix, quantum and location of development including landscaping, green infrastructure and biodiversity net gain to deliver the objectives of the EZ.
4. Guided by the Masterplan, the following uses at the EZ will be supported:
  - a. Target sectors comprising energy industry, advanced manufacturing and engineering, aviation and aerospace, food and drink manufacture and the digital and creative sector;
  - b. Outside the target sectors other B2,B8 and E(g) uses will be considered where this promotes job creation and industry diversification provided it does not compromise the development of the target sectors;
5. In the south east quadrant supporting facilities and services, excluding hot food takeaway uses (sui generis), to serve the EZ business community in this location limited to:
  - i. convenience store no greater than 275m<sup>2</sup> gross;
  - ii. café or sandwich shop no greater than 275m<sup>2</sup> gross;
  - iii. children's day nursery;



6. To enable the objective of the EZ to be delivered, the Green Belt boundary is amended as identified in Appendix E to release around 10.3 hectares of land to allow the first phase of development to be undertaken by 2027 to include:
  - a. serviced plots for employment development in line with point 4 above and policy DM7;
  - b. enabling housing development (Site Allocation HSA1.13);
  - c. a new link road and associated existing highways improvements to provide an eastern gateway access into the EZ from Common Edge Road;
  - d. providing compensatory improvements to offset the impact of removing land from the Green Belt through improvements to the remaining Green Belt including:
    - i. the relocation and enhancement of the existing playing pitches and provision of new changing facilities and vehicle parking, to remain within the Green Belt with improved access
    - ii. new and/or enhanced green infrastructure including landscaping and biodiversity net gain; and
  - e. supporting infrastructure.
7. To aid the delivery process, if requested, Blackpool Council will work with Fylde Borough Council, Lancashire County Council, National Highways and other stakeholders to produce a Local Development Order.

3.91 Blackpool Airport EZ is located in the south of the Borough off Squires Gate Lane. That part of the EZ which lies within Blackpool includes Sycamore Industrial Estate, Squires Gate Industrial Estate and Blackpool Business Park, as well as land used for sport playing fields in the south east corner of the site. Blackpool Retail Park which fronts onto Squires Gate Lane is not included in the EZ designation, nor is the airport runway, the latter is excluded so as not to preclude future development to accommodate larger commercial aircraft (Figure 4 refers).

3.92 The EZ site has been a major business and industrial area for many years and has provided important employment opportunities with 1,800 employees already based on the site. It is envisaged that EZ status will attract an additional 180 businesses and create 5,000 new jobs over its 25 year lifespan supporting the local and sub-regional economy; and providing sustainable economic growth and prosperity within Lancashire which is fundamental to the Lancashire Enterprise Partnership's ambitions.

## Design

### Design Principles

3.154 The National Design Guide was published in October 2019, and confirms that the long-standing, fundamental principles for good design are that it is 'fit for purpose, durable, and brings delight.'

3.155 Core Strategy Policy CS7 describes why securing high quality design in Blackpool is vital in creating attractive, successful and sustainable places in which people want to live, work and visit. Compromises in design quality are likely to have long term negative impacts on the town's economic, social and environmental sustainability.

3.156 All aspects of design in new development must be properly addressed from broad issues such as layout, scale and massing of buildings to more detailed issues such as architectural coherence, context and use of materials that are fundamental to the quality of the townscape. In this context DM17 sets out further detailed design requirements in all new development.

#### Policy DM17: Design Principles

1. All development should be of a high quality, and should enhance and respond to any positive character of the local area to create well designed, attractive and distinctive neighbourhoods in Blackpool.
2. Development should have regard to the following characteristics of the local area:
  - a. the topography and landscape features;
  - b. heritage assets and their setting;
  - c. the pattern, size and arrangement of streets, buildings and building lines;
  - d. the scale, height, massing and roofscapes;
  - e. vertical and horizontal rhythms created by windows and other architectural features;
  - f. materials, boundary treatments and landscaping.
3. New development should:
  - a. have a consistent architectural style across the whole building;
  - b. provide a human scale at street level;
  - c. have sufficient texture, depth and detailing to provide visual interest;
  - d. provide active frontages on all elevations with a street presence;

- e. not be dominated by car parking in front of the development;
  - f. be designed to prevent crime or the fear of crime;
  - g. not be less than four storeys in scale on the Promenade or within the Town Centre unless the character of the site and its surroundings suggests that four storeys would be inappropriate.
4. The materials used in developments should:
- a. be appropriate to the location and context in terms of their colour, texture, pattern and elements of detailing;
  - b. maintain a high quality visual appearance in the long term;
  - c. wherever possible be re-used or recycled and be re-usable or recyclable.
5. Particular attention should be paid to the design of new buildings:
- a. in sensitive locations such as those affecting heritage assets; or
  - b. that would be highly visible due to the prominence of the location or the scale of the development proposed.

#### Local character and distinctiveness

3.157 The NPPF states that planning policy should ensure that new developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Policies should also require development to establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and instinctive places.

3.158 It is important that developments are designed to protect and take advantage of any distinctive characteristics that make a positive contribution to an area. The first priority should be to contribute to a successful place overall, rather than considering the design of the development in isolation.

3.159 Respecting local character will often involve reflecting factors such as the existing scale of buildings and their design features, materials and boundary treatments in new developments. However, this may not always be appropriate, for example where it would draw attention away from a listed building or any other important landmark that is distinctive and a contributor to local identity. There may also be situations where a contrast to prevailing characteristics can enhance appreciation of those characteristics rather than detract from them, but such developments need to be very carefully designed to ensure that they are a positive rather than a negative feature and do not appear incongruous.

## Strategic Views

3.172 Strategic views of assets of particular importance such as historic or distinctive buildings and landscapes help to shape the identity of a place. New development should safeguard and enhance important views of such buildings and landscapes.

3.173 Views of Blackpool Tower and the seafront and coastline are particularly sensitive to changes in their setting given that the Tower is the focal point of the Promenade and the seafront and coastline serves as the shop window to the resort.

3.174 This policy aims to enable appropriate development in locations which will enhance Blackpool's offer without detracting from these established strategic views.

### Policy DM19: Strategic Views

1. Development should protect and enhance views of the following buildings and features of strategic importance:
  - a. Blackpool Tower – views from the seafront, from the piers and along main transport corridors leading into the Town Centre;
  - b. along the seafront and coastline;
2. Development that has a detrimental impact on these strategic views will not be permitted.

3.175 The seafront and coastline provide the main focal point of Blackpool as a seaside resort and Blackpool Tower is a nationally recognised landmark of significant historical and cultural importance that dominates Blackpool's skyline. The Tower can be seen from many locations throughout the town and across the wider Fylde Coast area. Views of the Tower are particularly prominent from the seafront, from the three piers and on main transport routes leading into the Town Centre.

3.176 New development can make a positive contribution to views of Blackpool Tower and the seafront and coastline but where development is likely to compromise these views, it will be resisted.

3.177 The scale, mass or height of existing buildings and structures which detract from a strategic view will not be accepted as a precedent for their redevelopment where there is an opportunity to improve the view with more sensitively scaled and massed development.



### Non-Designated Heritage Assets

3.268 The Council maintains a local list of over 200 non-designated heritage assets. Impacts from development affecting non-designated heritage assets or their setting are material planning considerations.

#### Policy DM28: Non-Designated Heritage Assets

1. Proposals which would retain, reuse and repair the significance of Blackpool's non-designated heritage assets will be supported.
2. There will be a presumption in favour of their retention when considering development proposals. Development which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where robust evidence can demonstrate that the benefits of the development clearly outweigh the harm.
3. Proposals must be accompanied by a heritage statement, the detail of which is proportionate to the heritage asset affected. Where a heritage statement fails to adequately explain and justify the proposal and its impact on the significance of the heritage asset this may be used by the Council as grounds to justify refusal of the scheme.
4. Where the loss of a non-designated heritage asset is proposed, the following information will be considered:
  - a. The significance of the heritage asset, in isolation and as part of a group as appropriate, its contribution to the character or appearance of the area, and the degree of harm that would result;
  - b. An appropriate level of survey and recording which may also include archaeological investigations;
  - c. The condition of the asset and the cost of any repairs and enhancement works that need to be undertaken;
  - d. The adequacy of efforts made to sustain existing uses or find viable new uses
  - e. The reuse of materials and architectural features in the new development; and
  - f. The public benefit arising from the proposals for the site;

g. Demonstration that the design of the new proposal is of an increased quality than the one it is replacing.

5. Where permission is granted for development which would result in the loss of a non-designated heritage asset, approval will be conditional upon the asset being fully recorded and the information deposited with the Local Planning Authority and the Historic Environment Record.

3.269 Local lists are a way of helping conserve buildings of local, rather than national, importance which make a positive contribution to the character of our streets and the town's history. Blackpool's local list was initiated by the findings of the historic townscape characterisation exercise in 2008/9 which identified buildings of local architectural and/or historic interest in those areas covered by the project.

3.270 Subsequently the decision was taken to extend the local list to cover the whole borough so that the special interest of all buildings of local significance could be taken into account in planning decisions. The process for local listing has now been established and the lists of buildings which have been formally adopted can be seen on the [heritage pages on the Council's website](#) [opens a new window].

3.271 Applicants are required to submit a heritage statement in support of any application that directly or indirectly impacts on local heritage asset. Whilst the information provided should be proportionate to the significance of the asset and nature of the works proposed the statement should consider as a minimum:

- The significance of the heritage asset, in isolation and as part of a group as appropriate, its contribution to the character or appearance of the area, and the degree of harm that would result;
- The public benefit arising from the proposals for the site;
- The condition of the asset and the cost of any repairs and enhancement works that need to be undertaken;
- The adequacy of efforts made to sustain existing uses or find viable new uses; and
- Appropriate marketing

3.272 Where a heritage statement fails to adequately explain and justify the proposal and its impact on the significance of the heritage asset this may be used by the Council as grounds to justify refusal of the scheme.

3.273 Early pre-application engagement with the Council's Conservation Officer is encouraged.

## Archaeology

3.278 The Council is committed to protecting remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate. Despite being a predominately nineteenth century town, Blackpool does have sites of earlier development particularly around Foxhall and in Layton and Bispham. The town has yielded archaeological material from the prehistoric, Roman and medieval periods.

3.279 This policy sets out the requirements where there is known archaeology or reasonable grounds for the potential for archaeology.

### Policy DM30: Archaeology

1. Development which would result in harm to or loss of the significance of a scheduled monument (or a site of national significance) will not be permitted unless it can be demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm.
2. Where there is knowledge of archaeological remains or reasonable grounds for the potential of archaeology, proposals will be expected to be accompanied by an assessment of the significance of any archaeology prior to the determination of an application for the site and how it will be affected by the proposed development. Where this demonstrates that it is of national significance (equal significance to a Scheduled Monument), proposals which cause harm to or loss will not be supported unless it can be demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm.
3. Where proposals affect non-designated archaeology of local significance, this will be a material consideration when determining any planning applications for development.

3.280 Where buried heritage would be affected by development, planning permission is likely to be subject to a condition requiring the implementation of a scheme of archaeological investigation and recording approved by the Local Planning Authority. This may include further stages of evaluation surveys, particularly if trial trenching has not been undertaken at the pre-consent stage; works to mitigate the loss of archaeological remains, such as a watching brief or excavation & mitigation; off-site analysis and publication of the results of the archaeological work; and deposition of the archive with a repository approved by the LPA.

## Environment

### Surface Water Management

3.283 A significant proportion of Blackpool has surface water and combined sewerage systems with capacities that reflect historical levels of design storms. However, the rates of runoff and the rainfall volumes have increased and are expected to continue to increase. Surface water flooding occurs when rainwater does not drain away through natural or man-made drainage systems or soak into the ground, but lies on or flows over the ground. In addition, the amount of surface water that enters the sewer network during storm surges can cause spillage into the sea.

3.284 These factors have a detrimental impact on Blackpool's bathing water quality. Under the requirements of the Bathing Water Directive, signs will be required on the beaches providing information on bathing water quality, which could potentially have a detrimental impact upon on Blackpool as a seaside resort. It is therefore essential that runoff rates and volumes are minimised in new developments.

3.285 Core Strategy policy CS9 Water Management sets out the strategic requirement to reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change. This policy provides further detailed policy specifically in relation to surface water management.

#### Policy DM31: Surface Water Management

1. Surface water from development sites will be discharged via the most sustainable drainage option available. The discharge of surface water should be in line with the following order of priority, in accordance with National Planning Practice Guidance:
  - a. into the ground (infiltration);
  - b. to a surface water body;
  - c. to a surface water sewer, highway drain, or another drainage system;
  - d. to a combined sewer.
2. On greenfield sites applicants will be required to demonstrate that the current natural discharge rate is replicated as a minimum. The starting point for this will be a maximum greenfield run-off rate for greenfield sites.
3. On previously developed sites applicants should target a reduction from pre-existing discharges of surface water to a target of greenfield rates and volumes so far as reasonably practicable, with a starting point of a maximum of a 30% reduction in run-



off rates. In critical drainage areas the greenfield standard will be expected, with a minimum of a 50% reduction in run-off rates.

4. All new development should:
  - a. include the use of sustainable drainage systems, unless demonstrated to be inappropriate; and
  - b. reduce areas of existing impermeable surfaces.
5. Approved development proposals will be required to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.

3.286 Sustainable drainage systems (SuDS) comprise a variety of interception and attenuation methods to manage surface water quantities and methods of treatment to improve water quality. They should be applied to new development in all cases.

3.287 SuDS should be considered at the earliest possible opportunity when devising proposals to ensure that they can be fully incorporated into the scheme. SuDS must be designed and installed in line with the latest national and local best practice and guidance in order to minimise demands on surface water sewerage systems and to prevent an increased risk of pollution to watercourses. They must be designed to meet these requirements over the lifetime of the development.

3.288 Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge and improving water quality. This can include hard and soft landscaping such as permeable surfaces at the plot level to reduce the volume and rate of surface water discharge.

3.289 The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. There will be an expectation for surface water to be discharged to ground via infiltration in the first instance. Applicants wishing to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available.

3.290 In order to ensure that flood risk is not increased, it is expected that run-off rates will be minimised. The starting point for this will be a maximum greenfield run-off rate for greenfield sites and a minimum 30% reduction in run-off rates on brownfield sites (50% in critical drainage areas).

3.291 Water management solutions relying on surface water pumping are not considered a viable drainage solution option as mechanical failure will lead to surface water flooding.

## Coast and Foreshore

3.310 Blackpool's coastline and foreshore is one of the resort's key assets, well used by both local residents and visitors. Coastlines warrant special protection as they are often sensitive to development due to their open character and the fact that they provide habitats for certain species of plants, animals and birds.

3.311 In order to meet the new Bathing Water Directive, a significant amount of work has been undertaken by the Council, United Utilities and other stakeholders to improve water quality and reduce the risk of flooding.

### Policy DM33: Coast and Foreshore

Development proposals will be supported which secure further improvements to bathing water quality or flood protection. Development proposals that would adversely affect the appearance, integrity or environmental quality of the beach and foreshore will be resisted. The Coast and Foreshore is identified on the Policies Map.

3.312 The Council is committed to protecting and enhancing the environment of the coast to ensure that its appearance and environmental quality is maintained or improved. Proposals that would have a detrimental impact on Blackpool's coast and foreshore will be resisted.

3.313 Shoreline Management Plans (SMPs) are part of the Flood and Coastal Erosion Risk Management planning framework. The North West England and North Wales Shoreline Management Plan 2 (SMP) sets the long term policy for the management of the coast and is taken forward through shoreline strategies and schemes. The Management Plan seeks to 'hold the line' along the Fylde Coast which means maintaining the current standard of protection; and the Catchment Flood Management Plan seeks to manage run-off rates and minimise flood risk.

3.314 The Marine Management Organisation (MMO) was established following the Marine and Coastal Access Act 2009. As the marine planning authority for England the MMO is responsible for preparing marine plans for English in-shore and off-shore waters.

3.315 The North West Marine Plan extends from the mean high water springs to the territorial limit. Marine plans are being developed on a rolling programme. The North West Marine Plan, which includes Blackpool, is currently being prepared and will be delivered by 2021, with a 20 year view of activities. Each plan will be monitored with three yearly reviews. All authorisation and enforcement decisions must be made in accordance with the marine plan, and all decisions which are capable of affecting the marine area must have regard to the marine plan.

## Biodiversity

3.321 Biodiversity is an important component of a high quality natural and built environment which helps strengthen the connection between people and nature and contributes to health and well-being, improves air quality, provides resilience to climate change and adds amenity value. The Council is committed to maintaining and enhancing the biodiversity and natural distinctiveness of sites with conservation value in Blackpool.

3.322 Core Strategy Policy CS6 highlights that international, national and local sites of biological and geological conservation importance will be protected, having regard to the hierarchy of designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/ species will be required where necessary. This policy expands on policy CS6 for development proposals affecting biodiversity including Sites of Special Scientific Interest (SSSIs), Marton Mere Local Nature Reserve, Biological Heritage Sites and Protected Species.

### Policy DM35: Biodiversity

1. Development proposals will be required to:
  - a. result in no loss or harm to biodiversity through avoidance, adequate mitigation either on site or off site or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement;
  - b. minimise the impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist in line with relevant legislation and guidance.

### SSSIs

2. Development will not be permitted in or adjacent to a Site of Special Scientific Interest where it would adversely affect, directly or indirectly, its wildlife and nature conservation importance. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

### Other sites of nature conservation value (including Local Nature Reserve and Biological Heritage Sites)

3. Development will not be permitted where it would adversely affect County Heritage Sites – biological or geological - and other sites of importance to nature

conservation interests, including all ponds in the Borough. Where in exceptional circumstances the benefits of development proposals clearly outweigh the extent of ecological or geological harm, developers will be required to compensate for such harm to the fullest practicable extent compatible with the conservation interests of the site.

#### **Protected Species**

4. Development will not be permitted if after mitigation or compensation it would have an adverse impact on animal or plant species protected under national or international legislation. Development proposals 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.

#### **Agricultural Land**

5. Development which is likely to lead to the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) will not be permitted unless supported by other policies in the plan or it is demonstrated that the loss is outweighed by other planning considerations.

3.323 It is vital that development proposals do not adversely impact on exiting biodiversity. The Mitigation Hierarchy will therefore apply with a requirement to consider avoidance, mitigation and compensation in that order<sup>32</sup>.

3.324 The Environment Bill 2019 introduced the concept of Biodiversity Net Gain, which relates to the protection, preservation and enhancement of habitats. Developers will be required to consider the increase to existing biodiversity in respect of any new development in line with relevant Biodiversity Net Gain legislation and guidance.

#### **SSSIs**

3.325 Sites of Special Scientific Interest (SSSIs) are statutory sites of nature conservation value designated by Natural England and represent the best of the country's habitats.

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<sup>32</sup> [A cross sector guide to implementing the Mitigation Hierarchy](#) [opens a new page] -



## Controlling Pollution and Contamination

3.337 The planning system contributes to and enhances the natural and physical environment by preventing development from contributing to, being put at unacceptable risk from or being adversely affected by unacceptable levels of air, soil, water or noise pollution.

3.338 Section 15 of the NPPF confirms that planning policies should seek opportunities to improve or mitigate impacts on air quality; should ensure development has no significant adverse noise impacts on health and quality of life; should limit the impact of light pollution on local amenity and landscapes; protect and provide net gains in biodiversity; and ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. The NPPF is clear that responsibility for securing a safe development rests with the developer and/or landowner.

### Policy DM36: Controlling Pollution and Contamination

1. Development will be permitted where in isolation or in conjunction with other planned or committed developments it can be demonstrated that the development:

- a. Will be compatible with adjacent existing uses and would not lead to unacceptable adverse effects on health, amenity, safety and the operation of surrounding uses and for occupants, users of the development itself or designated sites of importance for biodiversity, with reference to noise, vibration, odour, light, dust, other pollution or nuisance. Applications will be required to be accompanied, where appropriate by relevant impact assessments and mitigation proposals;
- b. In the case of previously developed, other potentially contaminated or unstable land, a land remediation scheme can be secured which will ensure that the land is remediated to a standard which provides a safe environment for occupants and users and does not displace contamination;
- c. Will not give rise to a deterioration of air quality in the defined Air Quality Management Area in Blackpool Town Centre or result in the declaration of a new AQMA. Where appropriate an air quality impact assessment will be required to support development proposals;
- d. Where development will result in, or contribute to, a deterioration in air quality, permission will only be granted where any such harm caused is significantly and demonstrably outweighed by other planning considerations and appropriate mitigation measures are provided to minimise any such harm.

- e. Will not pose a risk of pollution to controlled waters (surface or ground water) and will, where required, include mitigation and/or remediation to prevent any unacceptable levels of water pollution.

2. Proposals for the development of hazardous installations/pipelines, modifications to existing sites, or development in the vicinity of hazardous installations or pipelines, will be permitted where it has been demonstrated that the amount, type and location of hazardous substances would not pose unacceptable health and/or safety risks.

3.339 It is the Council's duty to determine planning applications after taking account of advice on public health and safety. Many aspects of pollution control are already regulated through other legislation and statutory bodies and the Council as local planning authority will not seek to duplicate the functions of any pollution control authority.

3.340 The NPPF states that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.

3.341 In considering planning applications for developments and uses that would have a potentially adverse impact on their surroundings, the Council will seek to control the location of such activities and land uses and restrict their development in close proximity to residential, educational, institutional, recreational and other environmentally sensitive areas such as designated sites of importance for biodiversity. Where necessary the Council will require measures to be undertaken to mitigate any unacceptable effects of development. These measures might include remediating contaminated land, screening, landscaping, sound insulation or changing the layout of the site. In certain circumstances the Council would expect an Air Quality Impact Assessment to accompany a planning application, which would identify any impacts on air quality and mitigation, as set out in national guidance. Whilst there isn't a definitive guide to when such an impact would be required, this would typically be where a development is in an area where air quality is known to be of concern; and/or if the development would be likely to give rise to a negative impact on air quality. The requirement for an impact assessment should be agreed with the Council prior to the submission of an application.

3.342 At the time of adoption there is only one Air Quality Management Area declared in Blackpool Town Centre. This is located in the north of Blackpool Town Centre in the area around Talbot Road and Dickson Road (see Appendix F).

## Transport

### Transport Requirements for New Development

3.361 Core Strategy policies **CS5: Connectivity** and **CS27: South Blackpool Transport and Connectivity** promote a sustainable and efficient transport network for Blackpool. The following policy provides further highway and transport requirements for all new development.

#### Policy DM41: Transport Requirements for New Development

1. New development will only be permitted where the access, travel and safety needs of all affected by the development are met. Proposals must ensure that:
  - a. safe and appropriate connection to the road network is secured for all transport modes requiring access to and within the development;
  - b. convenient, safe and pleasant pedestrian access and cycle routes are provided. Where existing public rights of way, or cycle routes are severed, effective alternative routes must be provided;
  - c. appropriate provision is made for public transport;
  - d. traffic management measures are incorporated to reduce traffic speeds; give pedestrians, people with impaired mobility and cyclists priority; and allow the efficient provision of public transport;
  - e. car, cycle and motorcycle parking is provided in accordance with the parking standards set out in Appendix G1; including the provision of electric vehicle (EV) charging infrastructure; and the layout provides for sufficient levels of servicing and operational space where required;
  - f. additional mitigation measures are factored into the proposal where traffic generated will impact on the surrounding highway network.
2. Transport Assessments and Travel Plans will be required having regard to the thresholds set out in Appendix G2.



### **Aerodrome Safeguarding**

3.374 Aviation makes a significant contribution to national economic growth, including in relation to small and medium sized airports and airfields (aerodromes). NPPF (paragraph 104) recognises the importance of maintaining a national network of aerodromes and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs.

3.375 Blackpool Airport lies adjacent to Blackpool's southern boundary within Fylde Borough and is an officially safeguarded civil aerodrome. The safeguarded area for the aerodrome extends into Blackpool Borough and is determined in accordance with government circular 1/2003 - advice to local planning authorities on safeguarding aerodromes and military explosives storage areas (as updated).

3.376 Safeguarded areas for Warton Aerodrome are determined in accordance with The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Storage Areas) Direction 2002 (as updated). The relevant safeguarding areas for Warton Aerodrome (also located in Fylde Borough), are identified by the Ministry of Defence (MOD). The safeguarded area reflects the need to restrict the height of built development in wider zones, including in Blackpool, in order to ensure safety for both aircraft crew and people on the ground. It also reflects the need to prevent interference to communication systems.

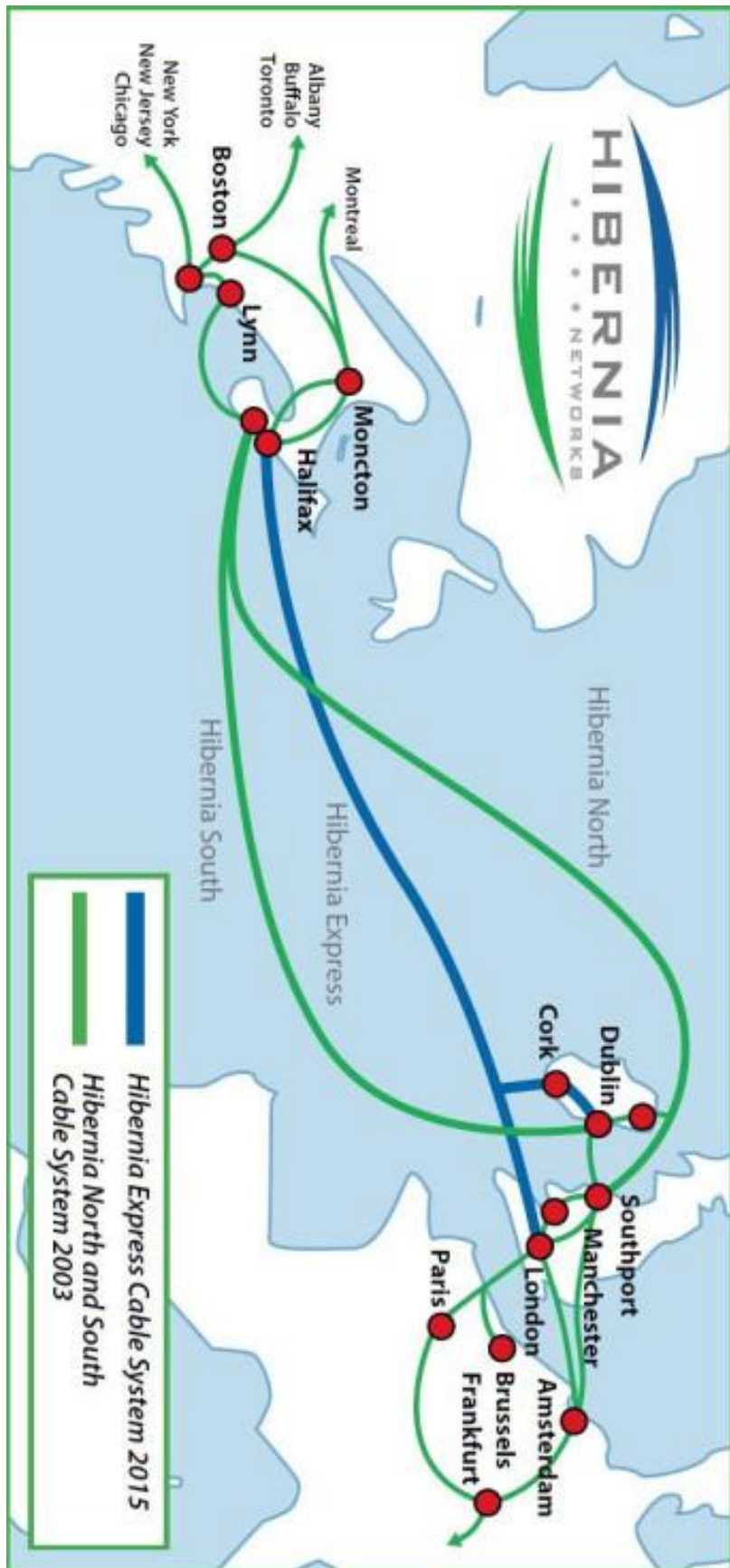
#### **Policy DM42: Aerodrome Safeguarding**

The Blackpool Airport Authority and the Ministry of Defence (MOD) will be consulted on all development proposals as appropriate within the aerodrome safeguarding area/zones shown on the Policies Map to ensure there is no adverse impact on airport safety at Blackpool Airport or Warton Aerodrome.

3.377 Aerodrome safeguarding is necessary to ensure that the operation and development of Blackpool Airport is not inhibited by buildings, structures, erections or works which would infringe on protected surfaces, obscure runway approach lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems; by lighting which has the potential to distract pilots; or by developments which have the potential to increase the number of birds or the bird hazard risk. The safeguarded area has been certified by the Civil Aviation Authority. Elsewhere in the Borough, proposed buildings and structures over a certain height will also be the subject of consultation with the airport authorities.

3.378 The MOD statutory aerodrome safeguarding zones surrounding Warton Aerodrome, which extend across parts of Blackpool, are shown on the Policies Map. The aerodrome height consultation zone protects the aerodrome's outer horizontal obstacle limitation surface and

## APPENDIX 2 – MAP OF TRANSATLANTIC CABLE SYSTEM



## APPENDIX 3 - BLACKPOOL VISITOR FIGURES

2022	▼	2023	▼	Blackpool	▼	YES	▼												
STEAM TREND DATA - COMPARING 2022 & 2023					Comparing 2023 & 2022 Indexed to 2023 Prices		COMPARATIVE HEADLINES												
LANCASHIRE: BLACKPOOL																			
KEY PERFORMANCE INDICATORS BY TYPE OF VISITOR - COMPARING 2023 & 2022																			
KEY		Staying in Paid Accommodation			Staying with Friends and Relatives (SFR)		Day Visitors		All Visitor Types										
Less than 3% change		Serviced		Non-Serviced															
A Fall of 3% or more	2023	2022	+/- %	2023	2022	+/- %	2023	2022	+/- %	2023	2022	+/- %							
Visitor Days	M	4.89	4.93	-0.7%	2.06	2.35	-12.3%	1.08	1.09	0.0%	8.04	8.37	-3.9%	18.78	17.48	7.4%	26.82	25.85	3.7%
Visitor Numbers	M	2.26	2.26	-0.4%	0.29	0.33	-12.2%	0.24	0.24	0.2%	2.79	2.84	-1.7%	18.78	17.48	7.4%	21.57	20.33	6.1%
Direct Expenditure	£Bn																1.50	1.51	-0.2%
Economic Impact	£Bn	0.85	0.88	-3.1%	0.19	0.22	-16.3%	0.06	0.06	0.0%	1.10	1.16	-5.5%	0.88	0.82	7.4%	1.98	1.98	-0.2%
Direct Employment	FTEs	11,212	11,091	1.1%	1,294	1,388	-6.8%	414	385	7.3%	12,919	12,865	0.4%	6,520	5,655	15.3%	19,438	18,519	5.0%
Total Employment	FTEs																23,419	22,234	5.3%



## APPENDIX 4 – DRAFT SOCIAL VALUE BEST PRACTICE PROPOSAL

## Offshore windfarm social value best practice proposal

### Our Joint Social Value Vision

We believe the Morgan and Morecambe Offshore Windfarm project presents a once-in-a-generation opportunity to deliver long-lasting community benefits across Blackpool, Fylde, Wyre, and South Ribble. Our shared vision is to unlock the full potential of this project by co-designing a social value legacy that supports thriving communities, protects and enhances the natural environment, and creates opportunities for all, especially those who need them most.

We are committed to developing a collaborative model of delivery that builds on our shared values, aspirations, and strengths. This includes a clear governance structure, joint planning and evaluation processes, and transparent reporting of outcomes. Our four authorities stand ready to work together and with our partners to shape a long-term, high-impact programme of activity, anchored in fairness and inclusion.

### Our Delivery Principles

To deliver this vision, we will apply the following principles:

- **Co-design:** Communities will be at the heart of shaping the priorities for social value, with early and inclusive engagement throughout.
- **Equity:** Social value activities will be targeted to support those facing the greatest barriers and underrepresented groups.
- **Sustainability:** Activities will aim to deliver long-term environmental, economic, and social benefit, aligned to the UN Sustainable Development Goals.
- **Transparency:** Outcomes will be monitored and shared publicly, with regular opportunities for review and learning.

### A Partnership Delivery Model

We propose establishing a **Social Value Steering Group** that brings together the four local authorities, key partners (e.g. Blackpool and The Fylde College, VCFSE sector, LCC), and the Morgan and Morecambe Offshore Windfarm team. This group would:

- Oversee delivery of the social value strategy and action plan
- Monitor progress and agree annual priorities
- Champion good practice and innovation
- Rotate chairing responsibility to ensure parity of voice

This model ensures the social value offer remains rooted in local needs, while coordinated at a strategic level across the sub-region.

### Key Areas for Collaboration

#### 1. Community Benefit Fund (CBF)

We welcome the commitment to a community benefit fund and propose a locally rooted delivery model. Based on best practice from UK onshore and offshore schemes (e.g. Orsted, SSE), we suggest:

- A funding range of £5,000–£8,000 per MW of installed capacity

#### Offshore windfarm social value best practice proposal

- A ring-fenced portion for each affected local authority area, with a shared governance board to agree priorities
- Management of the fund by the **Community Foundation for Lancashire and Merseyside**, ensuring robust administration and local grant making expertise
- A governance board including young people, VCSE representatives, local authorities, and community leaders

## 2. Jobs, Skills and Opportunity

We want to maximise local economic benefit, especially for young people and those furthest from the labour market. Our offer includes:

- Joint work with Blackpool and The Fylde College and other FE/HE providers to develop pathways into green jobs
- Inclusion of local training providers and community learning hubs in the supply chain
- Early outreach to schools (primary and secondary) with STEM-focused engagement and mentoring
- Establishment of a **Youth Voice Advisory Panel** to inform design of education, skills, and fund priorities
- A **Supplier Readiness Programme** to support local SMEs and social enterprises to bid for contracts, delivered in partnership with the Growth Hub

#### Indicative Job Roles and Duration – Onshore Cable Works

Job Role	Description	Estimated Duration	Local Employment Potential
Civil Engineers	Design and oversee cable trenching, ducting, and access roads	12–24 months	Medium
Cable Jointers	Specialised technicians joining and installing HVDC cables	6–18 months	Low–Medium
Ground workers	Excavate trenches, prepare land, install ducts and reinstatement	12–24 months	High
Ecological Surveyors	Monitor wildlife impacts, especially in coastal/Site of Special Scientific Interest (SSSI) areas	6–12 months (pre and during works)	Medium
Environmental Managers	Ensure compliance with environmental regulations and mitigation plans	Full project phase (24–36 months)	Medium
Traffic Management Operatives	Manage road access, diversions and public safety near cable routes	12–18 months	High

#### Offshore windfarm social value best practice proposal

<b>Health and Safety Officers</b>	Oversee all site safety and welfare for workforce and public	24–36 months	Medium
<b>Site Managers / Supervisors</b>	Manage day-to-day cable installation and reinstatement work	24–36 months	Medium
<b>General Labourers</b>	Provide manual labour support for cable laying, fencing, logistics	12–24 months	High
<b>Security Personnel</b>	Protect cable compounds, substations and temporary worksites	12–36 months	Medium
<b>Archaeologists</b>	Assess and monitor any groundworks for historic finds	3–6 months (intermittent)	Medium
<b>Community Liaison Officers</b>	Act as point of contact for residents, councils, and stakeholders	Full duration	Medium
<b>Land Agents</b>	Manage land access, compensation negotiations and agreements	Pre-construction to closeout (36 months)	Low
<b>Logistics Coordinators</b>	Manage movement of equipment, materials, and workforce	12–24 months	Medium
<b>Construction Apprentices</b>	Trainee roles across civils, plant operation, cable laying etc.	12–36 months	High (via FE partnership)
<b>GIS/Data Technicians</b>	Map route, survey points, monitor progress digitally	12–18 months	Low–Medium

### 3. Environment and Net Zero

The windfarm will be a symbol of the green transition. We propose:

- Joint design of **natural capital enhancement projects** along the cable route (e.g. Starr Gate to Blackpool Airport, Marton Moss)
- Supporting carbon offset and biodiversity net gain activity through community and school-led greening projects
- Circular economy pilots, e.g. reuse of construction materials in community infrastructure
- Engagement with the Turning Tides partnership to identify complementary coastal initiatives

### 4. Health and Community Wellbeing

We recognise the links between green infrastructure and community health. We will:

- Align projects to public health outcomes (e.g. mental wellbeing, active travel)
- Work with local anchor institutions (e.g. NHS, councils, voluntary sector) to embed wellbeing goals

#### Offshore windfarm social value best practice proposal

- Support youth, disability, and intergenerational programmes that link climate action with social connection
- Ensure the **Equity & Impact Framework** is applied to fund investments, prioritising the greatest local need

### 5. Measurement and Transparency

To ensure credibility, we will develop a shared measurement framework with Morgan and Morecambe Offshore Windfarm, based on recognised models such as the National TOMs. This will:

- Be co-designed with stakeholders
- Use Compliance Chain or similar tools for consistent data capture
- Include annual reviews and public updates
- Allow the social value strategy to adapt over time

#### Our Shared Offer

We believe this proposal represents a bold and practical approach to delivering social value. Together, we offer:

- An experienced cross-sector team across four local authorities ready to deliver
- Strong partnerships with education, health, and community sectors
- A ready-made regional structure through our Social Value Steering Group
- Proven capability in engaging and empowering communities

#### Our Asks

To deliver this shared vision, we ask for:

- A commitment to co-design the Community Benefit Fund and ensure it is delivered through an independent and locally accountable model
- Early engagement with our social value leads to co-develop the implementation plan
- Joint agreement of an **Equity & Impact Framework** to shape fund distribution and access to opportunity
- Support for local SMEs/social enterprises through pre-procurement and supplier readiness support
- A shared monitoring system for tracking outcomes and impact, with transparency built in from the outset

#### A Lasting Legacy

This windfarm has the potential to transform how our region delivers social value. Through collaborative governance, targeted investment, and inclusive community engagement, we can ensure its benefits reach those who need them most, now and for generations to come.

## Offshore windfarm social value best practice proposal

### Learning from Other Offshore Windfarms

To strengthen our approach, we have studied leading examples of offshore windfarms that have demonstrated exemplary collaborative working and social value delivery:

- **Hornsea Projects (Ørsted):** The East Coast Community Fund and Hornsea 3 Community Benefit Fund collectively invest over £1 million annually into local communities, with dedicated skills, green legacy, and capital project funding, shaped by public consultation and overseen by independent governance bodies.
- **Race Bank (Ørsted):** Delivered STEM programmes and careers support across coastal schools, alongside long-term grants to local VCFSEs.
- **Beatrice Offshore Windfarm (SSE):** Developed a £3 million community fund supporting regeneration, employability, and environmental resilience across the Scottish Highlands.
- **Walney Extension (Ørsted):** Created a fund targeting skills development, community infrastructure, and environmental projects in Cumbria and Lancashire, managed by an independent charitable foundation.

These schemes demonstrate the value of structured, transparent, and community-focused approaches to social value. We are committed to incorporating these lessons into the Morgan and Morecambe delivery model.

### Lessons Learned from Other Offshore Windfarm Schemes

While flagship offshore windfarms such as Hornsea, Race Bank, Beatrice, and Walney Extension have delivered substantial community benefits, evaluations and stakeholder feedback highlight several key lessons that can strengthen the Morgan and Morecambe approach:

- **Early Engagement is Critical:** In some areas, communities felt that consultation began too late to shape priorities meaningfully. Our approach commits to *co-design from the outset*, including youth, voluntary, and underrepresented voices.
- **Local Visibility and Trust:** Delivery mechanisms not rooted in the local context sometimes led to confusion or mistrust about how funds were allocated. By proposing a partnership with the Community Foundation for Lancashire and Merseyside and involving local leaders, we ensure *transparent, place-based delivery*.
- **Sustained Investment in Skills:** One-off training interventions had limited long-term impact. The most effective schemes embedded progression routes and employer partnerships. Our proposal includes a *Youth Voice Panel* and *FE-led green skills pathways* to embed this learning.
- **Clear Measurement and Feedback Loops:** Some schemes lacked robust, shared measurement frameworks, making it hard to track impact or adapt. We will use recognised models (e.g. National TOMs) and tools (e.g. Compliance Chain) with *annual public reporting* and built-in learning reviews.
- **Legacy thinking from the start:** Long-term thinking was sometimes an afterthought. We will ensure sustainability, equity, and community empowerment are *core principles from day one*.

#### Offshore windfarm social value best practice proposal

- **Addressing Past Exclusions:** It is noted that neighbouring authorities such as Wyre benefited from earlier offshore wind community funds, such as those linked to the Walney Extension, while Blackpool did not. This likely reflects legacy engagement boundaries set during early scheme development, rather than the absence of local need or interest. With the Morgan and Morecambe Windfarm, we have a valuable opportunity to ensure all impacted communities—including Blackpool—are recognised in the social value framework. We are committed to working collaboratively to establish a more inclusive and equitable model from the outset.

#### Proposed Metrics and Realistic Targets for a 1.68 GW Programme

Drawing on best practice from leading offshore wind projects, and adapting them to the scale and needs of Blackpool, Fylde, Wyre, and South Ribble, we propose the following indicative targets, to be refined during co-design:

##### 1. Community Benefit Fund

- **Benchmark:** £5,000–£8,000 per MW
- **For 1.68 GW (1,680 MW):**
  - Total fund: **£8.4m–£13.4m**
  - Phased over a **20-year period**, with early front-loading to high-need areas
  - Split into:
    - 60% local authority ring-fenced grants
    - 20% strategic joint projects
    - 20% innovation/reserve fund

##### 2. Employment and Skills

- **Jobs Supported:**
  - Target creation/support of **1,000 local job opportunities** over the construction and O&M phases
  - Minimum **25% of opportunities to go to priority groups** (young people, long-term unemployed, those with disabilities)
- **Training and Education:**
  - Reach **5,000+ learners** across schools, colleges, and adult education
  - Deliver at least **100 supported apprenticeships** in green and technical sectors
- **SME and VCSE Engagement:**
  - At least **£25m in supply chain contracts** awarded to local SMEs and social enterprises
  - **4+ supplier readiness events** per year with local business support

##### 3. Environmental and Net Zero Projects

- **Natural Capital:**
  - Delivery of **5+ nature recovery or coastal resilience schemes**, linked to biodiversity net gain and carbon offset
  - Engagement of **1,500+ volunteers** in community greening and conservation

#### Offshore windfarm social value best practice proposal

- **Circular Economy Pilots:**
  - At least 3 innovative reuse/recycle schemes during construction
  - Integration of sustainable materials in public/community assets

#### 4. Health and Wellbeing

- **Community Participation:**
  - Engage at least **10,000 residents annually** through wellbeing, inclusion, and climate action initiatives
  - Deliver **15+ grassroots-funded health-related projects** per borough across the life of the fund
- **Youth Engagement:**
  - Maintain a **Youth Voice Panel** with 20+ young people co-shaping decisions
  - Deliver regular youth-led evaluation reports

#### Next Steps and Timeline

To build momentum and coordinate our efforts effectively across the four boroughs, we propose the following next steps:

Timeline	Activity
June 2025	Convene first meeting of the Social Value Steering Group with local authority and Morgan and Morecambe representatives
July–August 2025	Begin community and stakeholder co-design sessions to inform fund priorities and measurement framework
September 2025	Draft and agree the final Social Value Implementation Plan and Equity & Impact Framework
October 2025	Launch supplier readiness and skills outreach initiatives (with FE providers and LCC Skills Hub support)
November 2025	Publish the first Social Value Baseline Report using shared measurement tools
December 2025	Agree annual review process and governance rotation plan

#### Annex: Supporting Data and Resources

##### A. Social Value Metrics from Comparable Offshore Wind Projects

Windfarm	Capacity (GW)	Community Benefit Fund (Annual)	Headline Impacts
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#### Offshore windfarm social value best practice proposal

Hornsea 1 & 2	2.6 GW	£1.3M+ annually	Funded 500+ local projects; 150 STEM workshops; >1,000 training places
Beatrice	0.59 GW	£3M over 5 years	Supported 300+ community initiatives; local employability hubs
Walney Extension	0.66 GW	£600K annually	Delivered apprenticeships, coastal access improvements, and nature projects

Source: Ørsted community benefit reports, SSE Renewables impact evaluations

#### 1. Hornsea Projects (Ørsted) Impact data:

- **Community Benefit Fund:** Ørsted's Hornsea 1 and 2 projects allocated **£1.2 million** per year to community initiatives in the Yorkshire area. This fund supported local education, health, and environmental projects.
- **Local Jobs and Skills:** As of 2021, **600+ jobs** were created during the construction phase of Hornsea 2 alone. They also provided **100+ apprenticeships** and training opportunities for local workers in the energy and construction sectors.
- **Supply Chain:** Ørsted committed to spending **70%** of the £3.6 billion construction cost with UK-based suppliers. Local businesses in Yorkshire benefited significantly from this investment, including contractors and service providers.
- **Environmental Impact:** Hornsea 1 and 2 contributed to **saving over 3 million tonnes of CO2** annually, equivalent to the emissions from **2.3 million cars**.

#### 2. Beatrice Offshore Windfarm (SSE)

##### Impact Data:

- **Community Fund:** The Beatrice project set up a community fund worth **£3 million**, supporting projects related to regeneration, employability, and local infrastructure development in the Scottish Highlands.
- **Local Employment:** Over the project's lifetime, **200+ full-time jobs** were created, with a specific focus on local employment in areas such as construction, maintenance, and offshore services.
- **Training and Development:** SSE invested in **50+ apprenticeships** and **120+ training placements** for local people, especially targeting young people and underrepresented groups in renewable energy.
- **Biodiversity Projects:** The project supported **coastal restoration** and **habitat creation** initiatives, helping to offset the environmental impact of construction and improve local biodiversity.

#### 3. Walney Extension (Ørsted)

##### Impact Data:

#### Offshore windfarm social value best practice proposal

- **Local Supply Chain:** Ørsted committed **£700 million** to UK-based suppliers during the construction phase of the Walney Extension, with **50% of contracts** awarded to local businesses in the North West of England.
- **Community Engagement:** Ørsted conducted **70+ community consultation events** during the planning and construction stages, ensuring that local residents had a voice in the development process.
- **Environmental Impact:** Walney Extension is expected to save **over 600,000 tonnes of CO2** annually, contributing significantly to the UK's net-zero goals.
- **Skills and Training:** The project generated **more than 100 apprenticeships and training placements** in green technologies and offshore wind, with a focus on women and young people.

#### 4. Race Bank (Ørsted)

##### Impact Data:

- **Community Fund:** Ørsted's Race Bank offshore wind farm established a **£1 million** community fund, which has been used to support local initiatives, including environmental projects, skills development, and youth engagement.
- **STEM Education:** Over **30,000 students** in local schools were engaged through STEM programs, with specific focus on renewable energy and sustainability.
- **Local Jobs:** The project created **100+ local jobs** and supported training for **50+ local apprentices** in green technologies.
- **Environmental Benefits:** The wind farm is expected to reduce **over 500,000 tonnes of CO2** per year, making a substantial contribution to environmental sustainability.

#### B. Evidence of Delivery

- **Hornsea Community Fund Dashboard (Ørsted):** [East Coast Community Fund has awarded over 3 million in grants](#)
- **Beatrice Windfarm Social Impact Reports (SSE):** [sdf-review-final.pdf](#)
- **Walney Extension Case Study (GrantScape):** [Walney Extension Community Fund Grants Awarded - Grantscape Grantscape](#)

These links provide real-world data on fund size, project types, beneficiaries, and delivery models.

#### C. Proposed Community Benefit Fund Scaling (Indicative)

Based on £5,000–£8,000 per MW and a 1.68 GW capacity:

Fund Rate per MW Total Potential Fund

£5,000/MW	£8.4 million
£8,000/MW	£13.44 million

Offshore windfarm social value best practice proposal

Assumes full generation capacity and maximum deployment. Final fund value subject to agreement and project phasing.

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#### 5. Offshore Wind Industry as a Whole

The offshore wind industry in the UK has created **over 30,000 jobs** in the past five years, with a projected **40,000 new jobs** expected by 2030. This includes direct employment, as well as jobs in the supply chain and through training programs.

The **UK Offshore Wind Sector Deal**, which includes a commitment to local job creation and the development of a skilled workforce, has seen an increase in apprenticeship schemes, STEM engagement, and opportunities for SMEs in coastal regions.

DRAFT

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