

Date: 12th April 2022

Direct Line: 01253 476237

Email: jane.saleh@blackpool.gov.uk

Marton Moss Neighbourhood Plan – Regulation 14 Consultation

Dear Mr Woodhouse,

Thank you for consulting Blackpool Council on the Regulation 14 draft of the Marton Moss Neighbourhood Plan (MMNP). The comments made at this stage have regard to the previous dialogue and written comments between the Council and the Neighbourhood Forum. The comments set out below include the Council's Response from Planning Strategy, Highways and Conservation.

Planning Strategy Comments

1. In terms of the plan's vision, the reference to development that is well adapted to climate change is welcomed; this supports the [Council's Climate Emergency Declaration](#). The plan's objectives generally follow through to the plan's policies. The Council welcomes several changes that have been made to policies following our last comments, however there are still some outstanding issues. The Council welcomes the policies in the plan on the local environment and movement, as well as the Design Code, that help to support the aims and objectives of the [Blackpool Green and Blue Infrastructure Strategy](#). The comments made on policies are where the Council still have concerns regarding the conformity of the Neighbourhood Plan with the Local Plan or where the Neighbourhood Plan could be made more effective.
2. As previously stated for Policy MM2 on Open Land Character it is suggested that the policy could benefit from clearer wording in terms of what type of open-air leisure uses are appropriate to a rural area, including clearer guidance on the type of holiday accommodation that is acceptable. It is noted that Objective 10 of the plan seeks to allow tourist accommodation uses that are in keeping with the open character of the area, but there is no separate policy covering tourist accommodation. Any policy in the draft MMNP which relates to (or includes) tourist accommodation needs to link back to part 1b of Local Plan Policy CS21 in terms of justifying the appropriate type of accommodation. It may also be beneficial to include additional guidance on residential amenity and the siting of built proposals in maintaining the open character.



GROWING PLACES
Blackpool Council
PO Box 17
Blackpool
FY1 1LZ

Contact
T: (01253) 477477
www.blackpool.gov.uk

3. For Policy MM3 on School Road / Midgeland Road, it is suggested that the policy could be made more effective by taking into account the previous comments made by the Conservation Officer: *“the junction of School Road and Midgeland Road currently is bounded by green spaces which mark the separation of the urban and rural and semi-rural. The open nature of this junction should be safeguarded in the plan with a policy to enhance the boundary treatments when the opportunity arises”*.
4. The reference to the housing figure in Paragraph 84 of the Neighbourhood Plan makes reference to this housing figure as a requirement. There should be a change of emphasis to set out that this is not a requirement and the plan is not seeking to meet a housing need, rather it is an assessment of how much housing growth can be accommodated whilst maintaining the character of the Moss. The Core Strategy housing requirement is not provided at a sub-local authority level. As previously stated the Council supports this approach which gives certainty and allocates appropriate sites to accommodate new housing development at Marton Moss.
5. The insertion of a sentence in paragraph 107 of the supporting text of Policy MM6 relating to the potential demand and viability for greenhouse cultivation in the future is welcomed. There are still some outstanding concerns with the policy in terms of providing stronger wording around what are the proposed alternative uses. This is in relation to ensuring that other proposed uses are compliant with wider policy in the Core Strategy, the emerging Local Plan Part 2: Site Allocations and Development Management Policies and the National Planning Policy Framework, particularly in terms of town centre uses, and how the cumulative impact of such uses is managed.
6. Policy MM7 Horse Stabling and Riding Activities would benefit from stronger wording relating to scale, design, highway requirements and amenity, particularly in relation to access for vehicles such as horse boxes and floodlighting. This is to ensure that it does not conflict with policies on residential amenity in the Core Strategy and emerging Local Plan Part 2: Site Allocations and Development Management Policies.
7. Paragraph 127 in the supporting text for Policy MM8 on Midgeland Farm identifies other authorities and organisations involved in the site in delivering the policy. The policy may benefit from additional detail about working with these bodies to deliver the policy and overcoming any viability issues.
8. On Policy MM9 Local Green Space, it is noted that the criteria set out in paragraph 102 of National Planning Policy Framework are set out in the supporting text. Paragraph 134 of the MMNP may benefit from the addition of a cross-reference to the Local Green Space Study that accompanies the plan to identify how the Local Green Space meets the criteria in national policy.
9. Looking at the site assessments forms for the two additional sites, there is some missing information and some inconsistencies with the approach taken for other sites set as out in the AECOM Site Assessment Report, which needs to be addressed.



Highways Comments

10. On the full list of sites, the comments previously made by the Council still apply, alongside additional comments on Site U/MM30 and the two additional sites that have been identified.
11. Site U/MM30 is currently allocated for two detached dwellings which, as set out in Policy MM4, would front Jubilee Lane, although the north and west of this site is bounded by Stockydale Road. In terms of being able to access the site from Stockydale Road, the site has a substantial boundary hedge on Stockydale Road. In addition the site is on the inside of a sharp bend in Stockydale Road. Either of these factors would make it difficult to achieve realistic visibility splays to enable site access.
12. There would be no objection to the development of the Stan's Mowers Site in terms of highways, given the scale of development anticipated and that the access to the adopted highway is acceptable. However, New Hall Avenue is un-adopted and without footways and is only suitable for limited additional development. There would be no highways objection to the development of the grazing land at Jubilee North at the scale anticipated.
13. The proposed development sites and densities are not sufficiently large to raise issues in relation to the volumes of traffic flows and appear to be able to accommodate adequate parking space for the level of development suggested. However, it is clearly not possible to anticipate the designs or geometries of individual accesses because existing and proposed locations and their boundaries have different attributes. For those sites that are taken forward to a Planning Application it is essential that the accesses should have adequate visibility between emerging drivers and the vehicles and pedestrians on the road itself whilst recognising the character of the area.

Conservation Comments

14. In terms of housing allocations, there is some concern regarding the sites proposed for housing allocations within the Conservation Area. Notwithstanding the site capacities that are set out in Policy MM4, the large size of the proposed allocations could attract speculative development to cover the whole plot. The plan should consider how the development of proposed housing allocations takes account of the potential impact on the character of the conservation area.
15. Site MM22/I (Adj. to Rushy Meade, School Road) is covered by a Tree Preservation Order (2020/39). This has been recorded on p.195 of the Site Options Assessment undertaken by AECOM (July 2020 – amended October 2020). It is noted that tree application 20/0502 was approved in January 2021, this sought to remove some of the trees including those on the frontage to School Road. However the TPO covers the entirety of the site, and as such we are concerned that this may impact on its suitability for housing development and needs further consideration for inclusion as a housing allocation.
16. With reference to the list of listed and locally listed heritage assets in appendix F, the locally listed K6 telephone box on Midgeland Road was removed some time ago.



GROWING PLACES

Blackpool Council
PO Box 17
Blackpool
FY1 1LZ

Contact

T: (01253) 477477

www.blackpool.gov.uk

We trust that you find these comments helpful and we look forward to working with you to progress the plan through its next stages.

Yours sincerely

E. Jane Saleh

Head of Planning and Transport Strategy



GROWING PLACES

Blackpool Council
PO Box 17
Blackpool
FY1 1LZ

Contact

T: (01253) 477477

www.blackpool.gov.uk