



Planning Statement

Land at Former Mariner's Public House

8 Norbreck Road

Blackpool

FY5 1RP

December 2021

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1. Introduction

- 1.1 Errigal Contracts Ltd wish to submit a detailed planning application for an affordable assisted living housing development at the former Mariner's site at 8 Norbreck Road, Blackpool. The description of development is noted to read as follows:

“Proposed erection of part 4/part 5 storey assisted living apartment scheme comprising of 30 single bedroom and 5 double bedrooms, and ancillary accommodation including residents lounge, buggy store and external residents garden and associated car parking.”

- 1.2 This statement will address the relevant national and local planning policies that deal with the principle of the proposed development.

Application Site Context

- 1.3 The application site is approximately 0.2 hectares in area and is located to the north of the settlement of Blackpool. The site is situated in an area characterised by residential use, and with an eclectic mix of buildings styles and designs. There are residential uses to the south, east and west of the application site, with the locally listed Norbreck Castle Hotel located to the north. The site is served with both pedestrian and vehicular access off Norbreck Road.
- 1.4 The site is currently vacant following the demolition of the former public house in 2007. However, as set out in further detail below, the site does benefit from planning permission for redevelopment, and as such is deemed to be suitable for a residential development, such as that being proposed within this scheme, as a matter of principle.
- 1.5 The site is sustainably located, with good access to public transport links including both bus and tram stops and other local services and facilities, including education establishments, shops, hairdressers, post office and pubs.
- 1.6 The site does not include any listed buildings, is not within a conservation area and is located within flood zone 1.

Proposed Development

- 1.7 The proposed development comprises of a part 4/part 5 storey assisted living development. The scheme comprises of 35 affordable living units with a number of

onsite communal facilities and 18 car parking spaces on site, two of which are disabled bays.

- 1.8 The proposed development has been designed to represent a contemporary style and use of materials, scale and form to reflect the local architecture. The material palette includes red brick and render with more details set out within the supporting Design and Access Statement.

Principle of Development

- 1.9 The National Planning Policy Framework is supportive as a matter of principle of new residential development within built up areas, particularly on sites which sustainable and are meeting identified needs for the provision of affordable housing, and those meeting other identified housing needs.
- 1.10 It is therefore our view that the development subject of this application is compliant with the provisions and principles of local and national planning policy. Further, that there are other material considerations which also weigh in favour of the grant of consent, and we would therefore kindly request that this application be approved without delay.
- 1.11 The former planning consents granted on site, and addressed in some detail below, further support the principle of the development subject of this application.

Submitted Documentation

- 1.12 This detailed planning application is supported by the following documents and drawings:

- *Application form*
- *Site location plan*
- *Existing site plan*
- *Proposed site and floor plans;*
- *Proposed elevations;*
- *Proposed streetscene and context elevations;*
- *Design and access statement;*
- *Drainage strategy and associated information;*

- *Proposed landscape scheme; and*
- *Site Access design and internal site movement information.*

Planning History

1.13 As set out above the site subject of this application has previously been the subject of a number of planning consents on site, which are detailed below:

Application Ref: 07/0581

Description of Development: *Erection of a four, five and six storey block comprising thirty-nine, self-contained apartments, formation of refuse store, cycle store, vehicular access and hard standing for the parking of 36 vehicles.*

Decision: *Application Refused*

Date of Decision: *25th September 2007*

Application Ref: 07/1092

Description of Development: *Erection of a part four, five and six-storey block comprising thirty-five, self-contained apartments, formation of refuse and cycle store, vehicle at access and hard standing for the parking of 37 vehicles*

Decision: *Application Approved*

Date of Decision: *26th February 2008*

Application Ref: 11/0170

Description of Development: *Erection of part four, five and six-storey block comprising thirty-five, self-contained apartments, formation of refuse and cycle store, vehicular access and hardstanding for the parking of 37 vehicles (Renewal of planning permission 07/1092).*

Decision: *Withdrawn*

Date of Decision: *13th April 2011*

Application Ref: 19/0382

Description of Development: *Erection of part four, five and six-storey block with roof top terrace comprising 36 self-contained apartments including refuse store, cycle store, landscaping and vehicular access from Norbreck Road with car parking for 36 vehicles to the rear*

Decision: *Withdrawn*

Date of Decision: *22nd August 2019*

Application Ref: 19/0720

Description of Development: *Erection of four/five and six storey block of 34 self-contained apartments including refuse store, cycle store, landscaping and vehicular access from Norbreck Road with car parking for 30 vehicles to the rear (Resubmission of 19/0382)*

Decision: Application Approved

Date of Decision: 23rd January 2020

- 1.14 As clearly demonstrated above there remains an extant planning permission for a 4-6 storey development on the site for 34 apartments. Given that this consent does not expire until January 2023 it remains a valid fall back and a material consideration in the determination of this application. Further, this previous grant of consent sets a clear precedent for the development now being proposed and supports the principle of development.

2. Relevant National Planning Policy

- 2.1 The Revised National Planning Policy Framework (the 'NPPF') was last updated in July 2021, and sets out the Government's planning policies for England, and how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF is a material consideration in the decision-making process and a summary of paragraphs considered material to the determination of this application read as follows:

Achieving Sustainable Development

- 2.2 **"Paragraph 8:** Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be*

provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- c) an environmental objective—to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

2.3 **“Paragraph 10:** So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”

2.4 **“Paragraph 11:** Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; “*

2.5 **“Paragraph 12:** The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”

Comment

2.6 The application site is sustainably located for the use proposed, with good access to key local services and facilities, including public transport links. The development comprises a scheme for assisted living affordable housing and is therefore understood to be meeting an identified housing need within the local area. The principle of a residential use on this site has long been established following the previous demolition of buildings on site and earlier grants of planning consent. The site is in a sustainable location, represents the re-use of a previously developed site, and is for a use which is deemed to be both acceptable and appropriate.

Decision Making

2.7 In relation to decision-making the NPPF states:

2.8 “**Paragraph 38:** Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

2.9 “**Paragraph 47:** Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

Comment

2.10 The proposed development represents an effective and efficient use of previously developed land within the urban area and is therefore deemed to be acceptable. It is our view that the development proposed is compliant with the provisions of the Development Plan when read as a whole, and we would therefore kindly request that planning consent be granted. Further, that there is no material change in circumstance in relation to use, design and scale from that previously approved which would warrant refusal of this further planning application.

Delivering a Sufficient Supply of Homes

2.11 There are numerous relevant and determinative paragraphs contained within the NPPF in relation to the delivery of a sufficient and appropriate supply of new homes within local authority areas. Specific attention is however drawn to:

2.12 “**Paragraph 60** states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

- 2.13 **“Paragraph 62** sets out that within this context, the size, type and tenure of housing need for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”
- 2.14 **“Paragraph 69:** Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
 - b) *use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
 - c) *support the development of windfall sites through their policies and decisions– giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
 - d) *work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*
- 2.15 **“Paragraph 74** advises that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”

Comment

- 2.16 The NPPF makes it clear that local authorities should prioritise the provision of new homes across the authority area, and specifically for developments which are meeting identified housing needs, such as that being proposed within this application. Furthermore, the development will be located on a previously developed site, is well

located for access to local services, facilities and transport, and on a site recently deemed to be suitable for residential use within a grant of consent in January 2020.

- 2.17 Given that the development proposed is meeting an identified housing need for affordable assisted living, and on a site already the subject of an approval for residential development, it is our view that the scheme is wholly compliant with the provisions of the Development Plan, and we would therefore kindly request that consent be granted without delay.

Promoting Healthy and Safe Communities

- 2.18 **“Paragraph 92:** Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

- 2.19 **“Paragraph 93:** To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

- b) *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- c) *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
- d) *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- e) *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."*

Comment

2.20 The provision of a small-scale housing development which will be meeting identified housing needs within the local area for affordable assisted living units, in a sustainable location will meet the tests set out above. Furthermore, the development has been designed to enhance interaction between the proposed residents and ensure safe and overlooked external spaces to the property frontages. The site is well located for access to local leisure and recreation facilities, as well as other key local services. The scheme will also promote wider social integration and a strong neighbourhood connection, whilst meeting the day to day living needs of the proposed residents within the development.

Promoting Sustainable Transport

2.21 Whilst one could argue that the level of traffic to be generated by the proposed development in an average hour would be de minimus, it is accepted that there is a need to address the potential highway impact of the scheme. As such, due regard is drawn to the following paragraphs of the NPPF:

2.22 **"Paragraph 110:** In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance,*

including the National Design Guide and the National Model Design Code 46; and

- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

2.23 **“Paragraph 111:** Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

2.24 **“Paragraph 112:** Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive—which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

Comment

2.25 As set out within earlier sections of this statement, the site is well located for access to public transport links and the main highway network with bus stops, post office, shops and eating establishments within walking distance of the application site. As such, we remain of the view that the site is sustainably located and can provide safe and suitable access for the proposed development. The level of additional traffic to be created by the proposed development is deemed to be de minimus.

2.26 Whilst the scheme does result in a reduction of parking on site from that previously approved, given the location of the site and the emphasis within the NPPF on

sustainable modes of travel, alongside the realistic travel needs of the proposed occupiers, this is not deemed to be to a degree which warrant refusal of this application. Information pertaining to the parking statistics of developments of this nature, as operated by the end user, is included with this application for context.

- 2.27 The development is therefore, in our view, deemed to be acceptable in relation to access and transport.

Making Effective Use of Land

- 2.28 The application site is currently vacant and clearly represents previously developed land. In this regard, attention is drawn to paragraph 119 of the Framework which reads as follows:

- 2.29 “**Para 119:** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

Comment

- 2.30 For the reasons set out above, the development proposed clearly represents the re-use of a previously developed site and for a use which represents a significant community and planning gain. The NPPF is clear therefore in its support for such development, and in this regard we would kindly request that planning permission once again be granted for this scheme, particularly given that the scheme will be meeting identified housing needs.

Achieving Well-Designed Places

- 2.31 The importance of good design is addressed at paragraph 126 which states that:
- 2.32 “**Paragraph 126:** Advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

Comment

- 2.33 The development comprises the provision of 35 affordable assisted living units in a part four/part five storey apartment block. As set out within the Design and Access Statement, the proposed development had been designed taking account of the character and appearance of the local area, and is deemed to be of an acceptable scale, form, height, design and use of materials to justify the grant of consent. When viewing the matter of design and visual impact, due regard should also be paid to the benefits of the redevelopment and re-use of the application site, which is currently an unattractive derelict site offering little visual or physical amenity within the local area, as well as paying due regard to the previously approved development on site.

Conserving and Protecting the Historic Environment

- 2.34 Whilst the application site is not listed, nor within a conservation area, it is understood that there is a Locally Listed Building – the Norbreck Castle Hotel, located directly to the north. In that regard due consideration will need to be paid to any harm caused to the setting and character of this heritage asset, and attention is drawn to the following paragraphs in the NPPF which address this point:
- 2.35 “**Paragraph 194** states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”
- 2.36 “**Paragraph 202** advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

Comment

- 2.37 As detailed above the application site itself is not listed, nor is it located within a conservation area. Furthermore, there are no statutory listed buildings in the local area.

There is not deemed to be any resultant harm on the setting and character of the locally listed Norbreck Castle Hotel given the distance and relationship between the sites. Furthermore, given the scale, form, design and use of materials the proposed development will result in visual enhancement of the application site and wider local area, to the benefit of the setting of this heritage asset.

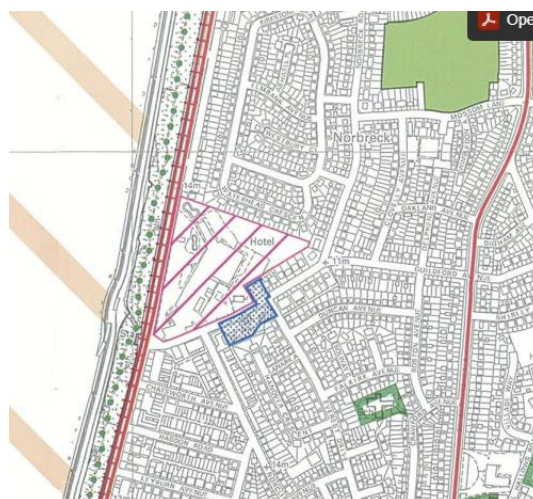
- 2.38 Should the Council deem there to be any resultant harm; this would clearly be outweighed by the public benefit of achieving planning consent for 35 affordable assisted living units for older persons. In addition, the impact of this scheme will be no greater than that previously deemed to be acceptable, and in fact we would argue that the public benefit to be achieved in this further application would further tip the planning balance in favour of the grant of consent.

Summary

- 2.39 It is clear for the reasons set out above that the development proposed is in complete accordance with the paragraphs and requirements of the National Planning Policy Framework. Therefore, in line with the provisions of paragraph 11 of the Framework, we would kindly request that the Council grant consent for this assisted living scheme without delay.

3. Adopted Local Planning Policy

- 3.1 The Blackpool Local Plan currently comprises the adopted Local Plan Part 1: Core Strategy as adopted in January 2016, and the saved policies of the Blackpool Local Plan adopted in 2006. Whilst it is accepted that there will be numerous policies of relevance to the determination of this application, specific regard is being drawn in this section to the key determinative policies.



- 3.2 As can be noted from the Proposals Map extract included above the application site is allocated as falling within the built-up area, close to the seafront and Norbreck Centre.

Saved Policies of the Blackpool Local Plan (2006)

- 3.3 **Policy LQ1 – Lifting the Quality of Design:** Notes that all new development will be expected to be of a high standard of design and to make a positive contribution to the quality of its surrounding environment. All planning applications for large-scale developments or smaller developments occupying prominent and/or sensitive locations, such as gateways and activity nodes must be accompanied by an ‘Urban Design Statement’. This statement will need to set out the design principles of the development covering the following:

- (a) *site appraisal and context*
- (b) *layout of street and spaces*
- (c) *activity and movement patterns*
- (d) *building design*
- (e) *public realm design*
- (f) *landscape design, including wildlife and biodiversity issues*
- (g) *energy and resource conservation*
- (h) *other relevant design issues.*

For the purposes of this policy, largescale developments are defined as residential schemes of 5 or more units or non-residential proposals in excess of 500 sqms. Sensitive and prominent locations are considered to be those within or adjacent to Conservation Areas, those directly affecting the fabric or setting of a Listed Building, those sites occupying landmark or nodal locations with the Town Centre, and any site within the Resort Core or Resort Neighbourhoods with any elevation fronting onto the Promenade.”

Comment

- 3.4 As can be noted from the plans and Design and Access Statement submitted in support of this application, the development has been designed to be respectful of its setting, and the character and appearance of the wider local area. The proposed development is of an appropriate height, scale, mass, bulk and design, reflects the local vernacular and does not result in detrimental impacts on the amenity of neighbouring properties.
- 3.5 Furthermore, the development will have no detrimental impact on views into and across the site, adequate arrangements have been proposed for site access, and raises no

design related matters which have not previously been deemed to be acceptable in the earlier grant of consent for the site. The development is therefore deemed to be compliant with the provisions and principles of adopted policy LQ1.

Policy LQ2 – Site Context

3.6 Advises that the design of new development proposals will be considered in relation to the character and setting of the surrounding area.

(A) *New developments in streets, spaces or areas with a consistent townscape character should respond to and enhance the existing character. These locations include:*

- (i) *affecting the setting of a Listed Building*
- (ii) *Conservation Areas*
- (iii) *other streets, frontages and areas with a consistent townscape character.*

(B) *New developments outside these locations should:*

- (i) *complement the prevailing design character of the surrounding area; and/or*
- (ii) *be high quality contemporary and individual expressions of design.*

Comment

3.7 The proposed development has been designed to reflect and respect the key characteristics of the local area, as well as to reflect the scale, form and design of the scheme as previously approved on site. The development represents a high-quality contemporary design, but with use of traditional build materials, and given the current derelict state of the site, alongside the wider planning gain to be achieved through the grant of consent, is deemed to propose a significant enhancement of the site, visual amenity and the wider street scene.

Policy LQ3 – Layout of Streets and Spaces

3.8 States that

(A) *The layout of all new development will be expected to create or positively contribute towards a connected network of streets and spaces that:*

- (i) *creates direct and integrated routes through the site which provide well signed and easy access to the existing street network, nearby facilities and public transport*

- (ii) *is designed in perimeter blocks where buildings and main entrances front on to streets or spaces and secure private space is located to the rear*
- (iii) *creates distinctive useable spaces, including public open spaces, which are well-defined by buildings, boundary treatments and landscaping creating a structure for habitat generation and migration*
- (iv) *promotes community safety and natural surveillance throughout the day and night by ensuring that streets, spaces, pedestrian and cycle routes, and car parking areas are overlooked by buildings*
- (v) *utilises a range of building designs that are capable of creating enclosure and the definition of routes including units that turn internal and external corners in a robust way*
- (vi) *provides or enhances a visually interesting environment through the creation of new landmarks, views and vistas*
- (vii) *assimilates sensitively into the surrounding built form and/or landscape context*
- (viii) *where possible, incorporates drainage requirements as features within the design in conjunction with sustainable drainage (SUDS) technology*
- (B) *Development that would prevent access to or otherwise prejudice the appropriate development of adjoining land will not be permitted.*
- (C) *Layouts that will introduce a road dominated configuration will not be permitted.*

Comment

3.9 The site already benefits from pedestrian and vehicular access, with detailed arrangements for the new development shown on the proposed layout plans submitted with this application. The access points are deemed to be safe and suitable and will support the scale of traffic movements to be generated by this development. The site is well located to reduce the need to travel, with good access to local bus and tram services further negating the need to use private motor vehicles.

3.10 Given that the scheme is being designed to meet the needs of the over 55's the importance of safety, security and suitable access have been fundamental principles in the design process. The development benefits from good levels of natural surveillance both on the property frontage and within the landscaped spaces for residents' use. The development will also significantly enhance the visual amenities of the street scene and local area when compared to the current derelict state of the site. The development will not prejudice the development of adjacent properties and will not

result in a development dominated by internal road networks. The development is therefore deemed to be wholly compliant with the provisions of policy LQ3.

Policy LQ4 – Building Design

3.11 Outlines that

“In order to lift the quality of new building design and ensure that it provides positive reference points for future proposals, new development should satisfy the following criteria:

- (A) *Public and Private Space - New development will need to make a clear distinction between areas of public and private space utilising appropriate landscaping and boundary treatments. Residential developments will be expected to achieve a connected series of defensible spaces throughout the development*
- (B) *Scale - The scale, massing and height of new buildings should be appropriate for their use and location and be related to:*
 - (i) *the width and importance of the street or space*
 - (ii) *the scale, massing and height of neighbouring buildings. Tall buildings which rise above the predominant height of surrounding buildings will be acceptable where the above criteria are satisfied and the building:*
 - (iii) *creates a landmark where one is required*
 - (iv) *does not detract from existing views of landmark buildings.*

Buildings of a larger scale and height will be encouraged in the following locations:

- *Promenade frontage and within the Resort Core - new buildings less than four storeys or equivalent in height will not be permitted along the Promenade frontage of Resort Neighbourhoods*
- *Town Centre and edge of Town Centre - new buildings less than four storeys or equivalent in height will not be permitted within the Town Centre*
- *Major routes into and out of the Town Centre*
- *‘gateway’ developments and major sites*
- *in and adjoining district centres.*
- (C) *Design of Facades - The detailed appearance of facades will need to create visual interest and must be appropriate to the use of the building. New buildings must have a connecting structure between ground and upper floors composed of:*
 - (i) *a base, of human scale that addresses the street*

- (ii) *a middle, of definite rhythm, proportions and patterns, normally with a vertical emphasis on the design and positioning of windows and other architectural elements*
- (iii) *a roof, which adds further interest and variety*
- (iv) *a depth of profile providing texture to the elevation.*
- (D) *Materials - will need to be of a high quality and durability and in a form, texture and colour that is complementary to the surrounding area.*
- (E) *Mixed Uses - New buildings or groups of buildings should promote opportunities for mixed uses. Development of the ground floor of an existing building must not prejudice the effective use of the upper floors by restricting access from the street via the front of the building.*
- (F) *Access and Servicing - Safe and convenient access and servicing into and around the building must be provided. Particular attention should be given to the needs of people with disabilities, the elderly and people with young children."*

Comment

- 3.12 Given the scale, form, and design of the previously approved development on site, and for the reasons laid out throughout this submission and within the Design and Access Statement, the development subject of this application is deemed to be wholly compliant with the provisions of Policy LQ4, and we would therefore kindly request that the Council grant consent for this further scheme.

Policy LQ6 – Landscape Design and Biodiversity

- 3.13 States that new development will be required to incorporate appropriate landscaping and benefits to biodiversity wherever possible, that:
- (a) *enhances the spaces between and around buildings, including new streets*
 - (b) *retains existing mature trees, shrubs, hedgerows and other landscape features and species, or habitats of ecological importance, within the site where possible and incorporates them into the overall design*
 - (c) *makes provision for appropriate replacement planting or creation of features where the removal of existing mature landscaping or important ecological species or habitats is unavoidable*
 - (d) *provides new planting of appropriate specification, including the use of indigenous species and semi-mature planting, where appropriate*
 - (e) *avoids the creation of left over spaces*

- (f) *provides an adequate buffer between obtrusive developments, such as industry, and other uses.*
- (g) *avoids interference with the operation of public CCTV systems where in place.*

Development proposals will be required, where appropriate, to submit a suitable and comprehensive landscaping scheme, with clear proposals for implementation and maintenance, as part of the planning application.

Comment

- 3.14 As can be seen from the proposed plans submitted with the application, the need to improve the site frontage and secure the provision of landscaping on site has been carefully considered and can be addressed in further detail, if required, as part of a suitably worded planning condition.

Policy HN4 – Windfall Sites

- 3.15 Advises that housing development will be permitted on derelict, vacant, underused and previously developed land within the urban area, providing:
- (a) *the land is not needed to maintain amenity or correct deficiencies in the character or amenities of an identified priority neighbourhood; and*
 - (b) *the land is not identified as being safeguarded for another use in the Local Plan and the need for that safeguarding still exists.*

Comment

- 3.16 The application site is a derelict, vacant, underused and previously developed site which is not required to be protected for its amenity requirements, nor safeguarded for another use. The site has previously been deemed to be acceptable and suitable for residential use, as per the previous approvals on site, and in that regard, it is clear that this is an acceptable location for a windfall site.

Policy HN6 – Housing Mix

- 3.17 States that new housing development will be required to provide an adequate mix of house types and sizes taking into account the local context and the site characteristics:
- A *Sites of greater than 1 hectare*
 - *a mix of house types and sizes will be required within the site.*
 - B *Sites of between 0.2 and 1 hectare*
 - *a mix of house types and sizes should be provided within the site or the type of housing proposed should contribute towards the mix of housing provision in the wider local area.*

- (C) *Where a mix is required the Council will permit the provision of no more than 60% of the total number of dwellings to be of:*
- (i) *any one house type (i.e. flats/terraces/semi-detached/ detached)*
 - (ii) *any one house size (i.e. number of bedrooms).*
- (D) *Flat developments including conversions Inner Areas:*
- (i) *in developments creating up to 3 units not more than one of the units may have less than two bedrooms;*
 - (ii) *in developments creating 4, 5 or 6 units not more than two of the units may have less than two bedrooms;*
 - (iii) *in developments creating 7, 8 or 9 units not more than three of the units may have less than two bedrooms;*
 - (iv) *in developments creating 10 or more units not more than one third of the units may have less than two bedrooms (with fractions of a unit counting a whole unit). Within the defined Inner Areas, proposals for new flat developments will not be permitted which would further intensify existing over concentrations of such accommodation and conflict with wider efforts for the comprehensive improvement of the neighbourhood as a balanced and healthy community. Elsewhere in the Borough:*
 - (v) *in developments creating 3 units, at least one unit containing two or more bedrooms should be provided*
 - (vi) *in developments creating 4 or more units, at least 50% of the units should contain two or more bedrooms.*
- (E) *All new housing developments throughout the Borough will be required to be self-contained and satisfy the Council's floorspace and amenity standards. Exceptions to the above requirements may be made for developments of sheltered or supported housing.*

Comment

3.18 The application site is 0.2 hectares in area. Further, the housing mix has been developed by the proposed end user to meet identified housing needs for older persons within the wider local area and will enhance the housing mix within this location. The development is therefore deemed to be compliant with the provisions of policy HN6, and we therefore kindly request that consent be granted for this development.

Policy HN7 – Density

3.19 Notes that all new housing developments should make efficient use of land, having regard to location, design and any constraints of the site. Housing developments should seek to achieve a net density of 30-50 dwellings per hectare. However, in order to promote more sustainable patterns of development, net densities of more than 50 dwellings per hectare will be permitted in the following locations:

- (i) *along public transport corridors with a frequent service; and/or*
- (ii) *close to the town centre, district centres or local centres.*

Comment

3.20 The density of development subject of this application reflects that previously approved on site and is deemed to be both acceptable and appropriate given the sustainable location of the site, and the good access to wider public transport links and other key services and facilities. Given the number of units already approved on this site, this further application to propose an alternative development, which has wider planning gain, is not deemed to represent any greater levels of overdevelopment and we therefore kindly request that the application be supported.

Policy HN8 – Affordable and Specialist Needs Housing

3.21 States that to make sufficient provision to meet the needs of Blackpool residents for affordable and specialist needs housing. The Council will require new housing developments on sites greater than 0.5 hectares or of more than 15 dwellings to make provision of a minimum of 30% of the total number of dwellings as affordable housing comprising:

- *On-site provision of affordable housing, either as discounted low cost social housing, shared ownership social housing or replacement social housing to rent or*
- *Off-site social housing provision to buy or rent directly linked to housing renewal action in Blackpool's housing priority neighbourhoods (to reduce the amount of poor quality rented accommodation).*

Proposals for affordable and special needs housing including sheltered housing for the elderly should be located close to public transport, local shops and other community facilities, and provision should be mixed throughout the development site. The Council will ensure that where discounted and affordable social housing is provided, it remains affordable to successive occupiers by:

- *developers entering into a legal agreement*
- *imposing appropriate planning conditions on any consent granted*
- *ensuring that initial rents or sale prices are subject to agreement by the council and index linked thereafter.*

Comment

3.22 The development subject of this application already has an end provider on board to secure the retention of these affordable units in perpetuity. Furthermore, the scheme seeks to secure the provision of much needed assisted living units in a suitable and sustainable location, with good access to public transport connections, Norbreck Centre and with good connectivity to Blackpool Town Centre. The site is also within walking distance of Blackpool seafront and other amenity spaces and is therefore perfect to meet the needs of older people, and to secure compliance with the provisions of policy HN8.

Policy AS1 – General Development Requirements

3.23 Advises that new development will only be permitted where the access, travel and safety needs of all affected by the development are met as follows:

- (a) *convenient, safe and pleasant pedestrian access is provided*
- (b) *appropriate provision exists or is made for cycle access*
- (c) *effective alternative routes are provided where existing cycle routes or public footpaths are to be severed*
- (d) *appropriate access and facilities for people with impaired mobility (including the visually and hearing impaired) are provided*
- (e) *appropriate provision exists or is made for public transport*
- (f) *safe and appropriate access to the road network is secured for all transport modes requiring access to the development*
- (g) *appropriate traffic management measures are incorporated within the development to reduce traffic speeds; give pedestrians, people with impaired mobility and cyclists priority; and allow the efficient provision of public transport*
- (h) *appropriate levels of car, cycle and motorcycle parking, servicing and operational space are provided, in accordance with standards set out in Appendix B. Where the above requires the undertaking of offsite works or the provision of particular services, these must be provided before any part of the development comes into use.*

Comment

- 3.24 The scheme proposes the provision of 35 assisted living units for the over 55's. The site is well located for access to public transport connections including bus and tram services, local services and facilities, and the parking provision on site has been developed to promote the use of alternative modes of transport, whilst ensuring the needs of the development have been met.
- 3.25 The scale and nature of development proposed is not deemed to result in a detrimental increase in traffic movements on the local road network and is therefore deemed to be acceptable in relation traffic management, traffic generation and car parking, and is therefore compliant with the provisions of policy AS1.

Blackpool Core Strategy (2016)

Policy CS2 – Housing Provision

- 3.26 States that provision will be made for the delivery of 4200 (net) new homes in Blackpool between 2012 and 2027. These new homes will be located on:
- *Identified sites within the existing urban area, including major regeneration sites;*
 - *Identified sites within the South Blackpool Growth area; and*
 - *Windfall sites*

Comment

- 3.27 The development of this windfall site in a suitable and sustainable location will assist the Council in meeting their identified housing targets and the requirements of policy CS2.

Policy CS7 – Quality of Design:

- 3.28 Advises that:
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 antisocial 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.*

Comment

- 3.29 As set out within the Design and Access Statement and elsewhere within this submission, the development subject of this further application is well designed and appropriate for this location in relation to scale, mass, height, layout, density, appearance, use of materials and relationship to adjacent buildings. The development represents a significant enhancement in the visual amenity of the site from its current vacant and derelict state and will have no greater impacts on visual amenity than the schemes previously approved.
- 3.30 The development will have no greater impacts on neighbouring amenity, or the highway network than the earlier grant of consent, and when weighed against the other material considerations which now also weigh in favour of approval, including the wider public gain from the provision of affordable assisted living units, all substantiate the case to support this application and issue a timely positive determination.

Policy CS13 – Housing Mix, Density and Standards

3.31 Outlines that new residential development will be required to provide an appropriate mix of quality homes which help to rebalance Blackpool's housing supply and support sustainable communities, by:

1. *Including a mix of house types and sizes, having regard to the specific character, location and viability of the site. The normal requirement is as follows:*
 - a. *On sites greater than 1 hectare, a maximum of 10% of all homes should be one bedroom, at least 20% of all homes should be two bedrooms; and at least 20% of homes should be three bedrooms or larger, in order to achieve a balanced mix of dwelling sizes within the development;*
 - b. *On sites between 0.2 and 1 hectare, a mix of dwelling sizes is required within the site, or the proposal should contribute towards a balanced mix of provision in the surrounding area;*
 - c. *On all sites, new flat developments will not be permitted which would further intensify existing over-concentrations of such accommodation and conflict with wider efforts for the comprehensive improvement of the neighbourhood. Developments including more than 10 flats are unlikely to be acceptable on sites in the inner area away from the seafront and town centre. Where flat developments are permitted, at least 70% of flat accommodation should be 2 bedrooms or more.*
2. *Providing quality living accommodation, which meets the relevant standards in place for conversions or new build development.*
3. *Making efficient use of land, with an optimum density appropriate to the characteristics of the site and its surrounding area. Higher densities will be supported in main centres and on public transport corridors.*

Comment

3.32 The assessment of development density has been undertaken in detail in relation to policy HN7. The assessment applies in equal measure to the evaluation of the scheme in relation to policy CS13, and in that regard we maintain that the proposed development density is appropriate and suitable for this site.

Policy CS14 – Affordable Housing:

3.33 Confirms that

1. *All market and specialist housing developments, including conversions, creating a net increase of three dwellings or more will be required to provide*

affordable housing (either on-site or off-site) or make a financial contribution towards affordable housing provision. Developments within the defined inner area are exempt from this requirement.

2. *Affordable housing should normally be provided as follows:*
 - a. *Where developments would comprise 15 dwellings or more, or on sites of 0.5 hectares or more, the requirement is 30% of the total number of dwellings created. On-site provision will be sought where possible. Off-site provision, or a financial contribution of broadly equivalent value, will be considered instead of on-site provision where the site is unsuitable for affordable housing, or where this would be more effective in delivering affordable housing to support Blackpool's regeneration objectives;*
 - b. *Where developments are on sites less than 0.5 hectares and would comprise 3-14 dwellings, then a financial contribution towards off-site provision will be sought. This contribution level will be set out in the Affordable Housing Supplementary Planning Document (SPD), in accordance with the most recent viability assessment and the latest government guidance;*
 - c. *Where the above requirements cannot be met in full as they would render a development unviable, and this has been robustly justified with the submission of a viability appraisal, then an alternative level of provision may be negotiated.*
3. *Where affordable housing units are being provided for in a development, they will be expected to deliver a mix of homes that meet current housing needs, of similar size and quality to equivalent market housing. The tenure mix will depend on the location of the 6. Strengthening Community Wellbeing Page 82 site although the general requirement will be for a mix of social rented and intermediate housing for sale or for rent. Further guidance on dwelling size, type, design and tenure mix will be provided in the Affordable Housing SPD.*
4. *The Affordable Housing SPD will also provide guidance on the approach to:*
 - a. *Phasing*
 - b. *Ensuring Affordability*
 - c. *Calculating financial contributions*

Comment

- 3.34 This application is being submitted on behalf of Housing 21 who are a registered housing provider. The scheme supports the provision of 35 on site affordable assisted

living units for the over 55's and is therefore wholly compliant with the requirements of policy CS14.

Local Plan Summary

- 3.35 For the reasons presented above it is clear that the provision of 35 affordable assisted living units on the land at the former Mariner's pub site is compliant with the policies, provisions and principles of the adopted Blackpool Development Plan. Furthermore, that the other material considerations (addressed below) further weigh in favour of the grant of consent. As such, we would seek Council support for this development and a timely determination of the application.

Emerging Local Plan

- 3.36 It is understood that Blackpool Council submitted the emerging Local Plan Part 2 to the Planning Inspectorate for Examination. It is further understood that the Examination Hearings have now concluded.
- 3.37 The site subject of this application is noted to be proposed to be allocated as a housing site within the emerging plan, and the development subject of this application will not therefore undermine the provisions of the emerging plan.

Comment

- 3.38 Given that the emerging Local Plan is still awaiting Independent Examination, and therefore the weight to be attached to the relevant policies within the document is limited, it is not proposed to address the emerging Local Plan policies in any further at this stage; albeit it is clear that approval of this application will not undermine the principles and delivery of the emerging draft document, and will in fact support the delivery of a site proposed for allocation for housing, which is a material consideration weighing in favour of the grant of consent.

Development Plan Summary

- 3.39 For the reasons set out above, it is our view that the development subject of this application represents an acceptable and appropriate form of development. The scheme will secure the provision of much needed affordable homes for older people in an area well served by public transport and local services and facilities. The site is previously developed and through careful design, can demonstrate that the scheme will not result in detrimental impacts on the character and appearance of the local area,

nor on the amenity of neighbouring residents. As set out below, there are also a number of other material considerations which weigh in favour of the grant of consent.

4. Material Considerations

- 4.1 Section 70(2) of the 1990 Act requires that the authority, in dealing with the application, shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. It has been demonstrated above that the proposed development is in accordance with the relevant Development Plan, including national and local plan policy. In addition to this, material considerations exist that weigh further in favour of the development, as follows:

Housing Need

- 4.2 The development subject of this application will assist the Council in delivering additional homes on a suitable and sustainable windfall site. The development comprises 35 affordable assisted living units which will be meeting an identified wider local need. The benefits to be achieved through the grant of consent for a scheme of this nature are clear, and weigh heavily in favour of approval of this application

Previously Developed Land

- 4.3 This is a vacant, derelict, underused previously developed site in a sustainable location within the built-up urban area. The proposals will secure an enhancement in the visual amenities of the local area, to the benefit of neighbour and visual amenity, and the use of a suitable and sustainable site with good access to key services and wider public transport connections. These are the sorts of sites which the NPPF clearly promote as being suitable for development, and we look forward to receiving the support from the local authority.

Planning History

- 4.4 As laid out within earlier sections of this submission, the site already benefits from planning permission for a similar scale development. This development remains extant and implementable and therefore is a clear fall-back position which weighs in favour of the grant of consent. The development subject of this further application will have no greater impact on the local area or neighbouring properties than the scheme previously approved, and when assessing the public benefits for a development of this form, the benefits compared to earlier proposals are clear.

Sustainable Development

- 4.5 The scheme as submitted represents a sustainable form of development on a parcel of land within a built-up area. The application site is well located for access to public transport, a medical centre, pharmacy, school, eating establishments etc. Furthermore, the development will result in job creation during the construction phase, additional spend in the local area once the residents move on to site and has been designed to ensure protection of the privacy and amenity of existing and proposed residents, and the visual amenities of the street scene. The development will support social interaction, meet the housing needs of a specific group from the local community and is well designed to reduce crime, and enhance the local area.

5. Conclusions

- 5.1 It has been demonstrated throughout this submission that the development subject of this application, accords with the relevant statutory duties and the Development Plan when read as a whole. The proposed development is acceptable in principle, by virtue of the provisions of the National Planning Policy Framework and the Blackpool Local Plan. Furthermore, numerous other material considerations weigh in favour of the grant of consent, and these have been dealt with in detail above.
- 5.2 Section 70(2) of the Planning Act 1990 and s38(6) of the Planning and Compulsory Purchase Act 2004 states that where the application accords with the relevant Development Plan and material considerations are in favour, applications should be determined positively. As such, based on the above principles, we would therefore kindly request that the Council seek to support this proposal and issue a grant of consent for this further development on site without delay.
- 5.3 Should you require any further information in advance of validation of the application, or during the determination process, please do not hesitate to contact us. Otherwise, we look forward to hearing from you shortly with confirmation of the officer appointed to deal with our application, and details of the application reference number and target determination date.