

# THE HOME BUILDERS FEDERATION

Date: 15<sup>th</sup> May 2015 Consultee ID: 18

## **BLACKPOOL LOCAL PLAN CORE STRATEGY EXAMINATION**

# Policy CS2 and supporting text: HBF amendments

- 1. The HBF would like to submit the following suggested amendments to Policy CS2 and the supporting text for consideration by the Council. These amendments are provided in response to the Inspector's concerns relating to the buffer of sites, expression of the housing requirement and ensuring the needs of the housing market area are met. These were discussed during the Matters 1 and 2 hearing sessions. The proposed amendments will hopefully assist the Council in achieving a sound plan.
- 2. The inclusion of the Council's preferred housing requirement, 4,200 over the plan period, within the proposed amendments should not be construed as an agreement to this figure. Our concerns highlighted both during the submission consultation and the hearing sessions remain. It should also be noted that these comments are provided without the benefit of further engagement with our members.
- 3. In the interests of cooperation and the achievement of common ground I am happy to discuss these amendments, and any the Council may wish to pursue, in more detail. The amendments proposed on behalf of the HBF are set out below.

#### **Policy CS2: Housing Provision**

Provision will be made for the delivery of around at least 4,200 (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

Prior to the adoption of the Site Allocations and Development Management document proposals for new housing development will be supported on sustainable sites identified within the most recent Strategic Housing Land Availability Assessment (SHLAA), providing they fulfil the other policy requirements of the plan.

The Site Allocations and Development Management document will provide sufficient allocations to meet the plan requirements in full, minus any completions and an allowance for windfalls, plus a buffer of approximately 30%. The allocations will be identified in accordance with the principles set out within Policy CS1.

### Paragraph 5.5

The scale and mix of housing and range of tenures that the population is likely to need over the plan period is evidenced in the Fylde Coast SHMA. In terms of scale, this recommends that the objectively assessed needs for the Borough lie between 250 – 400 homes per annum between 2011 and 2030 (the upper end of the assessed need is reduced to 380 new homes per annum over the plan period). The Council will continue to work with the other Fylde Coast authorities to monitor the overall level of housing delivery in the Fylde Coast Housing Market Area, and determine whether the needs of the area are being met in accordance with the Plan. Should the process of preparing the plans of neighbouring Fylde Coast authorities result in a significant change between the presently assessed objective housing need for the combined authorities and how this is distributed between the three areas, then an immediate review of the Blackpool Local Plan will be undertaken.

### Paragraph 5.13

In recognition of Blackpool's difficult housing market and the risks in delivering more challenging sites, the SHLAA <u>and Site Allocations and Development Management document</u> will identify a reasonable buffer of sites (around 30% although this will be kept under review) beyond what is required over the plan period, to provide flexibility should some sites not come forward as anticipated, despite using the best information available.

Yours sincerely

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