



THE HOME BUILDERS FEDERATION

Date: 22nd May 2015
Consultee ID: 18

BLACKPOOL LOCAL PLAN CORE STRATEGY EXAMINATION

Five year housing land supply - HBF comments

1. The HBF would like to submit the following comments upon the *Deliverable Five Year Housing Land Supply (1st April 2015 – 31st March 2020)* paper. This paper was submitted, in full, during the examination of the Blackpool Local Plan Core Strategy at the close of the matter 2 session. The inspector invited the HBF, as participants, to provide any comments by 26th May 2015.
2. The HBF consider that the comments within our original representation and matter 2 hearing statement, particularly those in response to questions 2.13 to 2.16, remain relevant to the new information. In respect of our response to matter 2, question 2.14 it is noted that the Council is accounting for more demolitions than those at Queens Park (see report appendix).
3. The Council's housing land supply report includes two key tables one on supply, the other on the five year requirement. These are dealt with separately in the remainder of this note.

Supply

4. Due to the limited time available to assess the report the HBF has not undertaken a thorough assessment of all the sites contained within Appendix A and B, and as such detailed comments upon the delivery rates of individual sites cannot be made. Nevertheless the HBF does have a number of concerns with the supply.
5. The supply relies heavily upon sites which are either awaiting permission (113 units) or there is no application. The latter is broken down into sites with developer interest (429 units) and windfalls (301 units). The supply which does not benefit from permission accounts for approximately 41% of the predicted five year supply, even if those awaiting permission are removed this still leaves over a third (730 units) of the supply which is not yet committed. Given the recent delivery problems within Blackpool this appears a bold stance to take.
6. Within our previous comments (see matter 2, question 2.13) we raised the issue of whether all planning permissions are likely to be brought forward and if, given the recent levels of delivery, a discount should be applied to such permissions to provide realism within the five year supply. This issue

affords much greater importance when considering sites either awaiting permission or yet to be the subject of an application. This is due to the further uncertainties regarding the granting of permission or indeed if an application will be made. On this latter issue the document appendix does not provide any certainty that all of these sites will come forward but rather suggests, in most cases, that applications are simply anticipated. There is no further explanation to indicate why or when an application is likely to be submitted. In such circumstances it would appear prudent to assume that a percentage of the sites are unlikely to come forward in the next five years. Furthermore, given the time it takes to gain permission, discharge all pre-commencement conditions, sign section 106 agreements and start on site it appears unlikely, even if all the sites came forward within the next few months, they will provide the full 730 units envisaged in the five year supply.

Five year supply calculation

7. The five year supply calculation spreads the backlog across the whole of the plan period. In conformity with our previous comments (matter 2, question 2.15) the HBF does not agree with this approach. It is considered contrary to the ethos of the NPPF and the guidance contained within the PPG (ID 3-035-20140306).
8. Notwithstanding our concerns over the supply or the phased approach to the housing requirement (see matter 2, question 2.9), if the backlog were included within the first five years the Council would fail to achieve a five year supply. The following table identifies the implications of including the backlog within the first five years.

Five year supply including full backlog

A	Housing target 2015-20, no adjustment	1,340
B	Shortfall from earlier in plan period	424
C	Five year target incorporating shortfall (A+B)	1,764
D	20% buffer	353
E	Five year target incorporating buffer (C+D)	2,117
F	Annual target for next five years (E/5)	423
G	Expected deliverable supply 2015 to 2020	2,064
H	Council's housing land supply equivalent to (G/F)	4.9 years

9. If our concerns over the uncertainty of the supply, the level of the housing requirement and its phasing are taken into account the housing land supply position is significantly worse. These issues should not be taken as justification for the spreading of the backlog, phasing or reducing the level of the housing requirement as this would be contrary to the NPPF requirement to boost supply and create a positive plan which meets needs in full. Rather the Council should seek to implement positive actions through the plan to ensure that a five year supply can be achieved.

Conclusion

10. The HBF does not consider that the Council can demonstrate a five year supply of housing land. To remedy this situation it is imperative that the Council seeks to boost its housing supply in the short-term. During the examination hearing sessions the HBF identified a number of possible ways this could be achieved. These included the need to provide a positive framework which enabled new sites to be brought forward prior to the adoption of the site allocations document, a separate note has already been provided to assist the Council in this regard.

Yours sincerely

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