



THE HOME BUILDERS FEDERATION

Planning Strategy,
Room 409,
Blackburn with Darwen Borough Council,
Town Hall,
Blackburn,
BB1 7DY
Email: forwardplanning@blackburn.gov.uk
Sent by Email only

Date: 29th June 2015

Dear Sir / Madam,

Blackburn with Darwen Local Plan (Part 2) Site Allocations and Development Management Policies – Housing Land Supply Position Paper (Amendments)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Housing Land Supply Position Paper, as amended. The HBF has also submitted a separate paper outlining our comments upon the Main Modifications to the plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The Council will be aware that the HBF was party to the examination of the Local Plan Part 2 and attended numerous hearing sessions including matter 2: Strategic Approach to Housing. The amended Housing Land Supply Position Paper was not available for comment until after the close of the hearing sessions and as such we would like to make the following brief observations.

Five year housing land requirement

4. Whilst the HBF does not support phasing of the housing requirement (see our response to question 2.3, matter 2 examination hearing statement) it is recognised that the requirements set out within paragraph 8 and 9 of the statement are consistent with adopted Core Strategy (Policy CS6). This creates a base requirement of 2,935 dwellings, between 2014 and 2019.
5. The backlog accrued since the start of the plan period is identified within table 1 of the Council's evidence as 1,020 units. This backlog is based upon the number of completions plus an allowance for long-term empty dwellings

compared to the Core Strategy housing requirement. The allowance for 152 long-term empty units which have been brought back into use in 2013/14 is a new addition to the supply which was not included within the previous evidence base (examination document 5.05), even though the evidence accounted for 2013/14 completions. The NPPG identifies that local authorities may consider including empty housing as a source of supply. In doing so it is clear that any approach must be 'robustly' evidenced and 'avoid double counting' (ID 3-039-20140306). Whilst the HBF has no reason to doubt the inclusion of the 152 units we are unaware of what evidence this is based upon. The updated evidence base does not clarify why and how these additional units have added to the supply. The HBF therefore queries the legitimacy of the 152 long-term empty units.

6. Notwithstanding the long-term empties the Council seeks to spread the backlog over the whole of the plan period and provides reasoning for this. The HBF consider this to be contrary to the PPG which clearly states;

'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate' (ID 3-035-20140306)

7. The Council's stance is clearly contrary to this and would go against the NPPF requirement for plans to be positively prepared. The Council's reasons for spreading the backlog are not considered sufficiently compelling to overcome these requirements (further consideration of the issues is included in our matter 2 examination hearing statement).
8. Finally the NPPF, paragraph 47, identifies that where there has been persistent under-delivery against plan targets a 20% buffer should be applied. The HBF agrees with the Council's conclusion in paragraph 8 that it is a 20% authority.
9. The HBF therefore consider that the 2014 to 2019 five year housing land requirement should be;

- Plan requirement – 2,935 dwellings
- Backlog – 1,020 dwellings (if long-term empties are justified)
- 20% buffer – 791 dwellings
- Total – 4,746 dwellings
- Annualised requirement – 949 dwellings

This compares to the Council's calculation within table 2 of 4,032 dwellings (total 2014 to 2019) and 806 dwellings (annual).

Components of the supply

10. Table 3 identifies the components of the Council's supply. The HBF made observations upon the majority of these components within our matter 2 hearing statement. These comments are still considered relevant but have not been repeated here to assist brevity.

11. We would, however like to make the following additional comments;
- Existing planning permission - whilst the HBF has not undertaken an assessment of the extent of the planning permissions we agree with the Council that a 10% lapse rate discount should be applied (see our matter 2 hearing statement);
 - Re-occupied long-term empty properties – the Council’s evidence suggested that 130 empty properties would be brought back into use over the next 3 years and 500 over the plan period (paragraph 35, examination doc ref: 5.05). It is unclear if the 152 empty units identified within the supply (see above) are exclusive or inclusive of these targets. If they are inclusive of the 130 units anticipated in the ‘next three years’ this source should be removed from the supply to ensure no double counting is occurring. If exclusive the Council should justify why the 130 units over the next three years and 500 over the plan period remain valid.
 - Paragraph 32 of the report identifies an anticipated delivery rate of 35dpa from unallocated sites. It is unclear upon what basis this assumption has been made. The PPG is clear that in determining deliverability; *‘Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out’* (ID 3-031-20140306). In the experience of the HBF such a rate of delivery would be high for an area such as Blackburn unless there was more than one outlet on the site, this is unlikely to be the case on smaller sites.

Conclusion

12. Whilst the HBF has not undertaken a detailed analysis of commitments and sources of supply it is clear that many elements of the Council’s statement are questionable. It is also notable that the base date is 2014 and as such the analysis is now over a year out of date. Since the base date an additional 95 dwellings plus any additional backlog will need to be added to the Council’s calculations, due to the additional year with a 625 dwelling requirement (current five year period 2015 to 2020). This alone is likely to mean the Council cannot demonstrate a 5 year housing land supply.

13. Due to the reasons provided above the HBF does not consider that the Council can adequately demonstrate it has a defensible five year housing land supply.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229