



# THE HOME BUILDERS FEDERATION

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Date: 5<sup>th</sup> October 2015

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**Sent by Email only**

Dear Sir / Madam,

## **Blackpool Local Plan Part 1: Core Strategy Proposed Main Modifications**

Thank you for consulting with the Home Builders Federation (HBF) on the Proposed Main Modifications consultation. The following comments should be read in conjunction with our representation form. The HBF is pleased to note that the Council has responded in a positive manner to a number of the issues we raised during the examination. We do, however, still have a number of outstanding objections to the plan which have not been addressed.

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.

We would like to submit the following comments. **If required the HBF would also wish to attend any further hearing sessions to debate these matters further.**

### **MainMod01, Page 35, Policy CS2**

The amendment is considered unsound as it is not positively prepared.

The proposed amendment, whilst an improvement upon the existing wording, is still not considered positively prepared. Whilst the wording removes ambiguity by the deletion of the word 'around' it appears to indicate that the plan target of 4,200 homes is a ceiling rather than a floor. The NPPF is clear that plans should be aspirational, positively prepared and provide a significant boost to housing supply (paragraphs 14, 17, 47, 154 and 182). The HBF

consider it important that the Local Plan should make clear that the housing requirement is to be seen as a minimum requirement. This will not only ensure that the plan is effective but will also ensure that sustainable development is not unnecessarily restricted through the interpretation of the housing requirement as a ceiling.

It is notable that many Inspectors have also concluded that given the requirements of the NPPF housing requirements should be expressed as minimums (examples of Inspector's reports include; Cheshire West & Chester Local Plan Part One, 15<sup>th</sup> December 2014, paragraph 48; Middlesbrough Housing Local Plan, 31<sup>st</sup> October 2014, paragraph 21; Richmondshire Local Plan: Core Strategy, 20<sup>th</sup> October 2014, paragraph 67; and Charnwood Local Plan: Core Strategy, 21<sup>st</sup> September 2015, paragraph 49)

The HBF recommends the following amendments are made to Policy CS2, to ensure that it is positively worded;

*'Provision will be made for the delivery of ~~around~~ at least 4,200 (net) new homes in Blackpool between 2012 and 2027'*

The above amendments would provide a more positive framework for housing delivery and identify that the Council is aiming to achieve, as a minimum, its objectively assessed need. The inclusion of '*net*' after the housing requirement would clarify that the requirement takes account of demolitions.

The presence of the Council's preferred housing requirement, 4,200 over the plan period, within our 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.

### **MainMod02, Page 36, paragraph 5.11**

The proposed modification is unsound as it will not be effective and is not positively prepared.

The paragraph merely indicates that the Site Allocations and Development Management Policies Document will allocate sites for housing. As discussed during the hearing sessions this document is unlikely to be adopted for a number of years. The HBF therefore considers that a positive statement upon existing sites, either within the SHLAA or promoted through other mechanisms should be included within the Core Strategy. This is considered particularly important in Blackpool given the low levels of delivery experienced over recent years and the need to promote sites and provide confidence within the market.

The HBF consider that the following wording could either be included at the end of Policy CS2, within paragraph 5.11 or as an additional supporting paragraph.

*'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’.*

### **MainMod03, Page 37, Paragraph 5.13**

The proposed amendment is considered unsound as it is not positively worded.

Throughout the examination hearing sessions the Council acknowledged that development within much of Blackpool is difficult due to viability constraints. It is therefore important that the Council seek as many avenues as possible to boost its housing supply. This should take account of the fact that some allocated sites are unlikely to come to fruition for a number of reasons. The HBF therefore recommend that a buffer of sites be provided, over and above the Core Strategy housing requirement, to ensure that the requirement is met as a minimum. This will provide flexibility within the plan, which is a key component of the NPPF. Whilst the proposed modification does discuss the potential of a buffer it stops short of indicating that this will be the case, despite the delivery problems within Blackpool. This is evident within the sentence;

*‘In recognition of Blackpool’s difficult housing market and the risks in delivering more challenging sites the Site Allocations and Development Management Policies document **is likely to include** a buffer of allocated sites over and above the minimum requirement. (our emphasis)’*

Whilst the HBF would welcome a specific buffer being indicated at this stage, with a preference for 30% given the delivery problems within Blackpool, it is recognised that the Council may wish to monitor the situation over the forthcoming years prior to the adoption of the Site Allocations and Development Management Policies Document. It is therefore recommended, as a minimum, the wording of the modification be amended to read;

*‘In recognition of Blackpool’s difficult housing market and the risks in delivering more challenging sites the Site Allocations and Development Management Policies document ~~is likely to~~ **will include** a buffer of allocated sites over and above the minimum requirement. (our emphasis)’*

This would commit the Council to the inclusion of an unspecified buffer ensuring flexibility is provided and provide a more positive stance upon which to compile the Site Allocations and Development Management Policies document. It would also suggest that the housing requirement would not be viewed as a ceiling (see our comments against MainMod01 above). The size of the buffer would be a matter for discussion at the Site Allocations and Development Management Policies document examination.

### **MainMod04, Page 38, Policy CS2 supporting text**

The proposed modification is considered sound.

Whilst the HBF would have liked to see greater commitment to review the plan, if the housing requirements across the HMA were not being met in full, the inclusion of the additional wording is supported.

### **MainMod05, Page 38, Policy CS2 supporting text**

The proposed modification is considered unsound as it will not be effective.

The HBF supports the inclusion of the additional wording. However, in common with our comments against MainMod02, above, we do not consider that the proposed modification is sufficiently positive or effective. Our concerns and recommendations upon this modification are the same as those for MainMod02, in aid of brevity they are not repeated here.

### **MainMod12, Page 66, Policy CS10 and supporting text**

The modification is considered sound.

The proposed modifications are considered reflective of the national policy position and our comments made at both the publication stage and throughout the examination.

### **MainMod14, Page 78, Policy CS13(1)**

The modification is considered sound.

The proposed modifications are considered reflective of the NPPF by including consideration of viability and providing an element of flexibility. This is also consistent with our comments made at both publication stage and throughout the examination.

### **MainMod16, Page 79, paragraphs 6.24 and 6.25**

The modifications are unsound as they are not consistent with national policy and have not been justified.

Whilst the amendments to paragraph 6.24 are supported the HBF has a strong objection to the inclusion of a requirement for all new housing development to meet the Government's Technical Housing Standards – nationally described space standard. The PPG is clear that such a standard can only be introduced through preparation of a Local Plan and only where justification is provided. This justification should identify the need, potential impacts upon viability and timing for the introduction of such a standard (PPG ID 56-020). These issues were not addressed, in relation to space standards, at the examination, nor are we aware that the Council has produced any further evidence to support the inclusion of the optional space standard.

The HBF therefore recommends that all reference to the space standards be deleted from paragraph 6.25.

### **MainMod17, Page 80, Policy CS14(2)**

The proposed modification is considered sound

The removal of the word '*minimum*' from the policy provides greater certainty to the development industry and as such is considered a positive step. Our concerns regarding the 30% affordable housing requirement do, however,

remain. These are based upon the viability implications of the policy as discussed within our comments upon the submitted plan and during the hearing sessions.

**Notification**

Please notify the HBF of the publication of the Inspector's report, the adoption of the Local Plan Part One or any future hearing sessions.

Yours sincerely,

MJ Good

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