



THE HOME BUILDERS FEDERATION

Date: 20th April 2015

Consultee ID: 18

Matter: 1

BLACKPOOL LOCAL PLAN CORE STRATEGY EXAMINATION

Matter 1 – Legal Requirements, Duty to Co-operate and Overarching Matters

1. The HBF would like to submit the following further comments in respect of Matter 1.

Question 1.1: Has the Council satisfactorily discharged its Duty to Co-operate in preparing the plan and does the strategy adequately take account of and respond to the plans, strategies and needs of neighbouring authorities? Is this adequately documented? In particular:

2. The NPPF (paragraph 178) states that public bodies have a Duty to Co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. It adds that the Government expects joint working on areas of common interest to be “diligently undertaken” for the mutual benefit of neighbouring authorities.
3. Paragraph 179 states that LPAs should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. It says that joint working should enable LPAs to work together “to meet development requirements which cannot wholly be met within their own areas”, and as part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. The HBF considers that the Council has failed to fulfil these requirements. Our concerns primarily relate to issues over housing delivery. This issue in relation to the duty is discussed question 1.1(b) below.

(a) Is the August 2013 Memorandum of Understanding between Blackpool, Fylde, Wyre and Lancashire County Councils up to date and still formally agreed?

4. The HBF consider this is an issue for the Council to address.

(b) In the context of a jointly prepared SHMA for the Fylde Coast is there an obligation on Blackpool to ensure that the minimum indicated figure for objectively assessed housing need in the

Fylde Coast area as a whole is met, notwithstanding statements from the partner authorities that they do not need to rely on Blackpool to help meet their housing needs?

5. Yes, the HBF consider that the three constituent Flyde Coast authorities should seek to meet the objectively assessed housing needs of the area. The 2013 SHMA (ref: EB004) clearly identifies that the three Flyde Coast authorities act as a single housing market area (paragraph 3.28, 3.30). In this regard it is clear that Blackpool should not be considering its housing requirement in isolation of the other authorities.

6. The NPPF, paragraph 47, clearly states that local authorities should;

‘...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;’ (our emphasis)

7. It is noted that paragraph 3.17 and Table A of the *Duty to Cooperate Statement* (ref: DC001) Blackpool has not requested neighbouring authorities meet any of its housing needs, nor vice-versa. Likewise the Memorandum of Understanding is also recognised. None of these statements or agreements deal with meeting the overall housing needs of the housing market area.

8. Within our comments upon the Submission Core Strategy the HBF highlighted that the combined plan requirements would not meet the lowest possible housing requirement identified within the SHMA (ref: EB004) by approximately 85 dwellings per annum (dpa). If the economic scenarios are considered it is 375dpa short of the lowest economic projections. Whilst the HBF is not suggesting that Blackpool should take all of this requirement it is unclear how the objectively assessed needs of the housing market area will be met. Without such an agreement the HBF contend that the duty cannot be fully satisfied and the plan is unsound based upon the requirements of NPPF paragraph 47.

(c) & (d)

9. The HBF has no further comments.

Question 1.2: Does the plan adequately provide for mitigation against significant adverse environmental, social and economic effects and is this adequately and accurately addressed in the Habitats Regulations Assessment and the Sustainability Appraisal (SA)? In particular:

(a) Should the SA consider the full range of figures indicated in the SHMA as the objectively assessed need for housing?

10. The HBF consider that the Sustainability Appraisal (SA) should consider the full range of housing figures contained within the SHMA. It is both a legal requirement and a test of soundness that the policies of the Core Strategy and any reasonable alternatives are the subject of

appropriate SA. In terms of the housing requirement the submitted SA (ref: SD004) simply states (section 3.4);

'The 2013 Strategic Housing Market Assessment identified a range of alternative housing figures which have been considered in the Housing Technical Paper (June 2014). The range included high, medium and low growth scenarios. In considering the benefits and disbenefits of alternative levels of housing provision within Blackpool's range of assessed need, on balance the Council does not believe that the high and low growth alternatives would deliver sustainable development that reflects the needs and aspirations of the local community, as set out in the Core Strategy and which are being delivered by various supporting economic, housing and health strategies in Blackpool. Therefore, they are not considered to be realistic alternatives as required by the SEA Regulations (further detail on this analysis is provided in the Housing Requirement Technical Paper). Only the medium range figure was considered realistic and deliverable.

As such, no alternative housing growth scenarios were assessed as part of this SA at this stage'.

11. The SHMA (ref: EB004) clearly identifies that the objectively assessed housing need for Blackpool lies within the range of 250 to 400dpa, as such it would appear realistic to test various points, both high and low, within the range. The Council's background paper *Blackpool's Housing Requirement: Technical Paper* (ref: EB003) (paragraph 6.10) clearly constrains the objectively assessed housing need of the area by reference to past development trends, challenging issues with development viability and the available capacity of land. The Council's preferred housing requirement is therefore based upon perceived delivery issues rather than need.
12. Given the output of the SHMA (EB004) the HBF consider a higher housing requirement which would meet the whole or a greater part of its housing need are realistic alternatives which should have been assessed to ascertain their relative sustainability credentials. It is clear, as discussed later (questions 2.2(b) and 2.2(e)), that a higher housing target would amongst other things provide the potential for greater economic prosperity through job creation and reduce affordable housing needs. The Council's assessment of the sustainability credentials of a higher housing requirement within the technical paper (ref: EB003) does not pay adequate regard to such issues. It is therefore unclear how, without taking regard of these issues as well as the wider SA framework the Council has determined that a higher housing requirement would not represent *'sustainable development'* or *'meet the needs or aspirations of the local community'*.
13. The housing target is a fundamental element of the Core Strategy. The Council's failure to undertake a full SA of all reasonable alternatives is considered a fundamental failing which has significant impacts upon the Core Strategy as a whole and makes it unsound.

(b) & (c)

14. The HBF has no further comments.

Question 1.3: Is it appropriate for the plan to take the form of a Core Strategy and to devolve key matters, including site allocations, to a future Site Allocations and Development Management Policies document? Is there a clear justification for this and does it accord with national policy?

15. The Blackpool Local Plan is intended to be brought forward in two stages a Core Strategy, followed by a subsequent Site Allocations and Development Management Policies DPD. Whilst this is not unusual the NPPF, paragraph 153, clearly indicates that the Government intends local planning authorities to produce a single local plan for its area, producing separate development plan documents only where clearly justified. The HBF is unaware that the Council has sought to provide any reasoned justification for producing several documents or any local circumstances which would have prevented the preparation of a comprehensive local plan. Whilst alone this need not be fatal to the soundness of the plan it is recommended that the Council identify what mechanisms will be put in place to ensure a significant boost to housing supply is achieved prior to the adoption of the Site Allocations and Development Management document.

Question 1.4: Is the plan period (2012 – 2027) soundly based and does it accord with national policy? Should the plan period be extended to 2030 to align with housing forecasts and to allow for a 15 year post-adoption life span?

16. The HBF comments upon the Submission Core Strategy clearly set out our concerns with the current plan period, both in relation to the compliance with the NPPF (paragraph 157) and the Council's own evidence base on housing forecasts (ref: EB003, EB004). In the interests of brevity these are not repeated here. Whilst the HBF would prefer the plan to provide a 15 year time horizon after the adoption of all documents an extension of the plan period until 2030 in conjunction with appropriate mechanisms to release land prior to the adoption of the Site Allocations and Development Management document would alleviate our concerns.

Question 1.5: Has the preparation of the plan empowered local people to shape their surroundings and does it set out a positive vision for the future of the area? Has the plan been derived from an open and transparent process which demonstrates how and why its strategy was selected, in consultation with the public and other stakeholders, in preference to the identified alternative options? Is the plan compliant with:

- (a) the Local Development Scheme?**
- (b) the Statement of Community Involvement?**
- (c) the Public Sector Equality Duty?**
- (d) the 2004 Act and the 2012 Regulations?**

17. The HBF has no further comments.

Question 1.6: Do the plan's policies logically flow from Vision and the Strategic Objectives and those in turn from the Spatial Portrait of Blackpool and the Summary of Overarching Issues?

18. The HBF note that the vision suggests that Blackpool will be the centre for the Fylde Coast economy which is diverse and prosperous. It also states Blackpool will attract new residents who aspire to live by the sea and provide and provide an improved choice of jobs and homes.

The objectives also seek to;

‘2. Support new housing provision to deliver a choice of quality homes across the Borough for new and existing residents;

3. Strengthen the local economy through sustainable investment in new enterprise, entrepreneurship and business start-ups, creating better paid jobs and a wider choice of employment; and

10. Meet residents' needs for affordable housing to provide people with a choice of homes they can afford in places they want to live’

The HBF supports the above aspects of the vision and objectives but do not consider that they flow through to the relevant policies. Our specific comments in relation to housing are discussed in detail both within our comments upon the Submission Core Strategy (ref: SD001) and within our matter 2 hearing statement.

Questions 1.7, 1.8 & 1.9

19. The HBF has no further comments at this stage.

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