



THE HOME BUILDERS FEDERATION

Date: 20th April 2015

Consultee ID: 18

Matter: 2

BLACKPOOL LOCAL PLAN CORE STRATEGY EXAMINATION

Matter 2 – Housing, Health and Education

1. The HBF would like to submit the following further comments in respect of Matter 2.

Matter 2a: Objectively Assessed Need for Housing

Question 2.1: Is the objectively assessed need for new housing in Blackpool, identified in the Feb 2014 Fylde Coast SHMA as lying within the range of 250 – 400 dwellings per annum (2011-2030), soundly based?

2. The HBF generally considers the SHMA methodology to be appropriate. We do, however, have a number of concerns with the range of figures identified as well as the 280 dwellings per annum (dpa). These concerns are outlined below and within our comments upon the Submission Core Strategy.

Question 2.2: Within the 250-400 dpa range is the figure of 280 dpa as the identified objectively assessed need for new housing (2012-2027) in Blackpool soundly based? And in particular is it appropriate:

- (a) ***to base the assessment primarily on an employment-led forecast of new dwelling requirements?***
3. Whilst it is appropriate that the Council align its economic and housing strategies this should not be the only factor which determines the objectively assessed needs of the area. The PPG is clear that the most recent household projections provide the starting point but uplifts should be made for economic and market signals. In this regard the HBF consider the suggested objectively assessed need to be unsound.
- (b) ***to give greater weight to the Oxford Economics forecasts of jobs growth than to the Experian forecasts?***
4. The AMION report *Towards an Objective Assessment of Housing Need in Blackpool* (ref: EB006) suggests that the Oxford Econometrics forecast more closely align with local policy expectations (paragraph 5.1.3) yet it does also suggest, within the same paragraph that both projections provide realistic projections. The main variance between the two projections is that the Experian forecasts are more positive than there Oxford Econometrics counterparts. The Experian model anticipates jobs growth over than plan

period (1,230) whilst the Oxford model anticipates jobs losses (-1,005). Given that the NPPF is clear that plans should be positively prepared and seek to create jobs (paragraph 18), it appears perverse for Blackpool to be basing its housing requirement upon a jobs-led scenario which will ultimately lead to economic decline. Given that the 2012 sub national population projections (2012 SNPP) anticipate an increase in the population of Blackpool over the plan period this will either lead to more people commuting out of Blackpool for work or an increase in unemployment.

5. It should also be noted that the Oxford forecast is a 'policy-off' forecast which does not take account of policy interventions. The Oxford forecasts are also discounted in favour of more ambitious employment land requirements within Policy CS3 (see 2.2(e) below).

(c) to assume that household formation rates captured in trend based forecasts were not constrained by under supply of housing in past years?

6. Between 2003/4 and 2011/12 the Council has under-supplied against the former RSS target by 1,184 dwellings or 30% of the overall requirement. In the last two years, since the start of the proposed plan period just 96 net new dwellings have been completed. This represents a significant level of under-delivery which will have had a significant impact upon household formation rates. The Council's *Housing Requirements Technical Paper* (ref: EB003) acknowledges in paragraph 3.37 that the;

'The SHMA analysis does not directly take account of any allowance for backlog in constructing the household projection scenarios and identifying the range of objectively assessed need for each Fylde Coast authority..... This accords with advice on the treatment of backlog in the PAS Guidance Note (July 2013) that [up to date] household projections take into account unmet need, and therefore there is no need to try and 'make up' any past shortfall in housing provision, as the shortfall is reflected in future household projections'.

7. It is not true to say that the household projections take into account unmet need. The June 2014 PAS technical advice note *Objectively Assessed Need and Housing Targets* (paragraph 5.18) recommends that where there has been persistent undersupply either through a moratorium or time expired plan this would require compensation and a relevant lift in the housing requirement. Similarly the PPG suggests where;

*'.....formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. **As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply**' (Our emphasis, ID 2a-015-20140306)*

8. It is therefore clear that unmet needs should be taken into account and this will require an uplift upon the household projections. The HBF consider that the constrained supply within Blackpool over the last 10 years will undoubtedly have had a significant impact upon household formation rates. It is considered that an uplift upon the household formation rates is required to take account of this under supply.

(d) that the figure is predicated on not seeking to provide for a continuation of the past trend of in-migration of housing benefit claimants?

9. The HBF notes that the Council's *Housing Requirements Technical Paper* (ref: EB003) identifies a significant proportion of in-migrants were housing benefit claimants. This fact is not disputed but it remains unclear what mechanisms the Council will implement to reduce these past trends or indeed what size of reduction may be feasible. It should be borne in mind that the last five years have seen low levels of migration compared to earlier periods. Therefore the impact of any such reduction in benefit claimants upon the objectively assessed housing needs of the area are very unclear.

(e) that the figure is predicated on a reduction in the number of jobs in Blackpool, albeit reducing at a lower rate that has occurred in recent years? And is this compatible with the strategy for employment land, based on a continuation of historic land take-up? (see also Matter 3)

10. The HBF do not consider a housing requirement which is predicated upon a reduction in jobs to be positively prepared or consistent with the NPPF, this is discussed in greater detail within our comments upon the Submission Core Strategy, and as such is not repeated here. It is, however, worth re-iterating that the reduction in the number of jobs is based upon a 'policy-off' employment forecast. Yet there are a number of initiatives taking place in and around Blackpool which are likely to have an impact upon job creation, including the Blackpool Enterprise zone announced in the Budget (18th March 2015) and the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs over the period 2015 to 2025 (LEP Strategic Economic Plan (SEP) ref: EB015). The SEP also identifies the renewal of Blackpool as a specific priority with a number of transformational schemes which will undoubtedly improve the attractiveness of Blackpool as a destination to live, work and visit. The implications of these interventions upon job creation and associated need for additional housing have not been adequately addressed within the plan nor its evidence base.

11. There is a significant mismatch between the strategy for employment land and the housing requirement. The housing requirement is most closely related to the Oxford Econometrics forecast which highlights a reduction in jobs growth over the plan period. The June 2014 *Employment Land Study* (ref: EB012) considers the impact of the Oxford forecast and notes taking account of the realistic supply of employment land (17.8ha) the 'policy-off' forecasts would result in a net surplus of between 17.95 to 19.95ha

(employment based) or 12.25 to 12.35ha (labour supply based) (table 38 EB012). This compares to the Council's chosen employment land requirement based upon past take-up rates which indicates a net shortfall of 13.7ha. The *Employment Land Study* discounts the Oxford forecasts as;

'...It is probable that these land requirement calculations represent a false position....' (Paragraph 7.24, EB012)

12. Yet this forecast is used to justify the housing requirement. Whilst it is noted that the above quote is made in reference to land requirement rather than jobs it remains unclear why the Oxford forecast is considered appropriate for the housing requirement but not the employment land requirement.

(f) that the figure is towards the bottom of the 250 – 400 dpa range indicated in the SHMA?

13. The HBF does not consider that the proposed housing requirement is sufficiently aspirational. It is set towards the bottom of the range identified within the SHMA and would ultimately lead to continued job losses and a decline in the economic prosperity of Blackpool. This is not considered to be a positive approach to planning for the area.

(g) that the figure is substantially less than the 444 dpa figure set in the revoked RS?

14. The RSS is now revoked and in this regard the HBF consider limited weight should be attached to it and the evidence base upon which it was founded. It must, however, be recognised that the Government has clearly expressed its stated intention to significantly increase housing supply nationally. Indeed paragraph 47 of the NPPF clearly sets out the need for local authorities to *'boost significantly the supply of housing'*. In this context a housing requirement reduction of nearly 40% upon the revoked RSS requirement would not appear to be within the ethos of the Government's aspirations.

(h) that the figure would be very unlikely to result in the identified need for affordable homes being met? And does the 280 dpa figure take appropriate account of market signals?

15. The 2014 SHMA (ref: EB004) indicates a net annual shortfall of 264 affordable dwellings, this equates to 94% of the overall housing requirement. The achievement of 264 affordable dwellings annually using the proposed housing requirement is therefore clearly unattainable. If the Council were to achieve a policy compliant 30% affordable housing from every application over the plan period this would still only achieve 84 affordable dwellings per annum, 180 short of the need. However, due to issues of viability and the fact not all housing sites will deliver affordable housing the actual amount is likely to be significantly less.

16. The September 2014 HMR (ref: EB008) identifies in table 7 gross completions of 635 affordable dwellings between 2003/4 and 2013/14 this

provides an average of approximately 58 units per annum. The HMR further identifies (Table 14) that of the 1,779 dwellings with an extant planning permission just 281, or 16%, are affordable housing commitments. This is significantly below the overall requirement. In cases where the need for affordable housing clearly won't be met the NPPG advises;

'An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes'. (ID 2a-029-20140306)

17. The Council has not sought to meet the full needs for affordable housing and therefore is contrary to NPPF paragraphs 47 and 159 and as such must be regarded as unsound. To rectify this issue an uplift in the overall housing requirement is required to meet these needs. It is notable that the need for affordable housing is increasing. The 2008 SHMA identified an annual need for 140 affordable dwellings, therefore the rate has nearly doubled between the SHMAs. The 2014 SHMA addendum (ref: EB005) indicates a small but further worsening of the situation with a net annual affordable housing need now standing at 272 (figure 6.3).

18. A further issue for consideration in determining objectively assessed needs relate to market signals. The PPG advises that market signals include land prices, house prices, rents, affordability, rates of development and overcrowding (ID 2a-019-20140306). A worsening trend in any indicator requires an upward adjustment to planned housing numbers compared to ones based solely on household projections (ID 2a-020-20140306). The SHMA and technical paper (ref: EB003) do consider many of these issues but there is no clear indication if and how market signals have been taken into account. This is a fundamental element of determining the objectively assessed need for housing (PPG ID-2a-019-20140306). The HBF considers this a failing of the current needs assessment and refers the Council to the recent interim comments by the Inspector of the Cheshire East Local Plan Strategy document who notes that;

'SHMA takes account of a range of market signals, including house prices, rents and affordability, whilst other evidence addresses the past rate of development and overcrowding. However, it is not clear how the results of these assessments have been taken into account in the OAN estimates, they are not specifically referred to in the background forecasts and no direct action seems to have been taken to address these factors in the assessment of overall housing need.'

19. In terms of the signals it is clear that past rates of development would indicate an uplift is required (see response to 2.2c above). It is also noted that overcrowding, whilst better than the national average, is worse within Blackpool than any other Fylde Coast authority (SHMA figure 4.10). In addition as discussed earlier affordability issues are significant and getting worse. The HBF therefore concludes that a significant uplift is required to deal with the need for affordable housing and market signals.

Question 2.3: In determining the objectively assessed housing need what weight should be given to the SHMA sensitivity testing of an improved economic activity rate in Blackpool?

20. An improvement upon economic activity rates would reduce the housing requirement in terms of the jobs-led scenarios and increase the potential for jobs within the other tested scenarios. The proposed increased activity rates within the SHMA sought to bring Blackpool into line with the Lancashire average by 2031. It is notable that even if this were to be achieved only three scenarios would lead to an increase in jobs these are;

- Migration-led (10 year) 248dpa, 41 jobs per annum;
- Re-based SNPP (2010) 340dpa, 147 jobs per annum; and
- Employment led (Experian) 336dpa, 82 jobs per annum.
(figure 8.3, EB004)

21. All except the migration led scenario still require a greater housing requirement than currently planned. The SHMA also indicates that caution should be applied when utilising these reductions;

'It is possible that economic activity rates could improve over the projection period. This will, however, be dependent on a number of interlinked factors including the growth of the local economy to include new jobs which match the skills of the current and future labour-force and the success of intervention programmes to get those currently economically inactive into work. This requires careful consideration in the context of future work which is intended to be commissioned by Blackpool Council examining the future shape of its economy.'
(paragraph 8.22)

22. The fact that Blackpool has traditionally had lower economic activity rates than surrounding authorities or Lancashire coupled with skills issues led the *Housing Requirements Technical Paper* (ref: EB003) to argue;

'Overall, it is not considered reasonable to propose Blackpool specific adjustments to the economic activity rates, unemployment rates and commuting ratios used in the SHMA. Any changes or adjustments would not be specific to Blackpool alone. However, the alternative activity rate scenarios modelled in the SHMA do provide an interesting indication of what might happen if either activity rates were to increase due to structural or cyclical factors'. (bullet, paragraph 3.22)

23. Due to the inherent issues within Blackpool and the lack of credible alternative evidence the HBF agrees with this conclusion.

Question 2.4: What are the implications of the 2012-based ONS Population Projections and the 2012-based DCLG Household Projections (anticipated to be published in February 2015) for the objectively assessed housing need in Blackpool?

24. Following the publication of the SHMA (ref: EB004) and the addendum (ref: EB005) the 2012 based sub-national household projections (2012 SNHP) were released. The PPG, as amended, is clear that these represent the most up to date estimate of future household growth and as such should be used as the starting point for determining household growth (ID 2a-016-20150227). Over the full projection period (2012 to 2037) an annual growth of 166dpa is identified for Blackpool. This is a significant increase upon the previous 2011 interim SNHP which identified an increase of just 30dpa (2011 to 2021). If the plan period is considered (2012 to 2027) annual growth rates are expected to be slightly lower at 136dpa.
25. In determining whether the 2012 based SNHP are appropriate it must be considered that these have been influenced by a period of deep recession. It is widely acknowledged that the effect of the recession is a propensity towards lower household growth. Therefore as the economy continues to improve it is likely that household formation rates will also increase. It is therefore likely that the current household projections could suppress actual future rate of household growth. In this regard the HBF consider the 2012 SNHP should be considered as an absolute minimum starting point requiring uplift for market signals, previous undersupply and economic growth.

Matter 2b: The Housing Target and Trajectory

Question 2.5: Is 280 dwellings per annum (dpa) a soundly based figure for the housing target for Blackpool? Would it significantly boost housing supply and be aspirational yet realistic?

26. No, the HBF does not consider that the housing target is either aspirational nor will it provide a significant boost to housing supply. As noted within our comments upon question 2.2 (g) above the housing target is approximately 40% lower than the previous housing requirement for the area. It is also, in our opinion, less than the objectively assessed housing needs of the area (see comments against matter 2a above). Given that Blackpool has not requested assistance from any neighbouring authority to meet its housing needs the housing requirement should at least meet the objectively assessed needs.
27. In terms of supply it is notable that the SHLAA indicates 3,979 deliverable dwellings plus a windfall allowance of 1,400 over the plan period. This equates to 5,379 dwellings or 359dpa, without consideration of any sites that are currently within the Green Belt. The *Housing Monitoring Report* (HMR, ref: EB008), Table 2, also clearly indicates that over the period 2004/5 to 2006/7 net completions were significantly greater than the proposed target, suggesting that providing the correct sites and policy conditions are provided a housing target greater than 280dpa can be accommodated. Consideration of the supply of housing over a longer period is referenced within the *Housing Requirements Technical Paper* (ref: EB003) which identifies that since 1991 an average delivery rate of 263dpa has been achieved (paragraph 6.8), placing the housing requirement just

17dpa greater than this long-term average is not considered to provide the significant boost required by the NPPF.

Question 2.6: In relation to the housing target should policy CS2 refer to “delivery of around x new homes”, “delivery of x new homes” or “delivery of at least x new homes”? (See MM05)

28. The HBF consider that the housing target within policy CS2 should refer to the ‘delivery of at least x new homes’. This statement would be reflective of the need for flexibility, positive planning and significant boost housing supply required by the NPPF.

Question 2.7: Is there robust evidence indicating that the 280 dpa target can be delivered?

29. Whilst the HBF has not undertaken a detailed assessment of the SHLAA sites it is notable that the trajectory (Figure 7; *Housing Requirements Technical Paper* (ref: EB003)) suggests that rates of housing completions could exceed the 280dpa target.

Question 2.8: Is there compelling evidence that windfall sites will continue to provide a reliable source of housing land supply, sufficient to provide 1400 homes over the plan period?

30. Over the period 2003/4 to 2013/14 windfalls have provided a significant source of supply within Blackpool (*HMR, Table 2*; EB008). This is, however, unsurprising given that the previous plan only allocated sufficient land for 286 dwellings between 2001 and 2016, with just 0.2ha of the allocated land remaining (*HMR, paragraph 3.7*). Given that the Council is now seeking to provide deliverable allocations through a new plan and that the SHLAA has no site size threshold the rate of delivery from windfalls will undoubtedly decrease.

31. The HBF does not dispute that windfalls are likely to continue to provide a significant source of supply within Blackpool, but an over-reliance upon this source could place the housing requirement of the plan in jeopardy and simply mean that the Council is not able to identify a robustly evidenced five year land supply. This is particularly important when the conclusions of the Council’s *Local Plan and Community Infrastructure Levy Viability Study* (Viability Study) (ref: EB002) are considered. Paragraph 10.56 of the study notes;

The analysis shows that, in the current market and when ignoring the Council’s (and other’s) interventions residential development within the Inner Area is generally unviable.....

32. Whilst windfall developments are likely to come forward from other locations it would appear likely that the inner area will provide the greatest opportunities in terms of potential sites, but these are likely to be thwarted due to viability. The HBF therefore recommends that the Council reduces its reliance upon windfall developments taking place and identifies further deliverable allocations. This will ensure that the plan provides greater opportunities to meet the full housing requirement. If windfalls do come

forward at the rate suggested by the Council the reduction would simply provide greater flexibility within the plan.

Question 2.9: Is a phased approach to the delivery of new housing soundly based and consistent with national policy?

33. The HBF set out our concerns with the phased approach to housing delivery in our comments upon the Submission Core Strategy. The Council has not provided any additional evidence to support the need for a phased approach and as such are concerns are considered to remain valid, in the aid of brevity they are not repeated here.

34. In addition to our earlier comments it is also worth noting that the housing trajectory, Figure 7 *Housing Requirements Technical Paper* (ref: EB003) indicates the delivery rates set out in the table below.

Time period	Rate of delivery per annum
Years 1-5	322
Years 6-10	429
Years 11+	405

Derived from Figure 7 Blackpool Housing Requirements Technical Paper (2014) (Ref: EB003)

35. The Council's own evidence therefore does not substantiate the reduction of the housing requirement early in the plan period, indeed it indicates a higher level of completions could be achieved. The net effect of reducing the housing requirement will be that the current needs within Blackpool will not be met in full until late in the plan period. This will have the effect of either increasing out-migration as those whose needs cannot be met seek accommodation elsewhere, or increased overcrowding and affordability issues. The plan provides an opportunity to create a 'step-change' in development in the area by providing a wide variety of sites which are more attractive to the market. The economy has and will continue to play a role in the delivery of housing and as such the plan must react to this in a positive manner by identifying sites which are viable and able to deliver early in the plan period.

Question 2.10: If a phased approach to delivery is appropriate should it be more closely aligned with the Amion Consulting (May 2014) report analysis of dwelling requirements by five year periods?

36. No, this is based purely upon trend based economic factors and does not take any account of future changes nor the social needs of the area.

Question 2.11: Is the 30% buffer of SHLAA sites sufficient to address the challenging nature of some potential sites in inner areas? Or does it indicate the need to allocate additional less-challenging sites?

37. The HBF supports the use of a buffer as this will provide additional flexibility within the plan. The HBF does, however, have concerns relating to the size of the buffer. Table 2 of the *Housing Monitoring Report* (ref: EB008) identifies that since the introduction of the SHLAA process in 2008/9 a total of -176 dwellings have come forward from identified sites.

38. The February 2014 *Local Plan and Community Infrastructure Levy Viability Study* (Viability Study) (ref: EB002) clearly demonstrates in Table 10.8 the challenges of developing within inner areas of Blackpool. Given these challenges the HBF consider a need to provide a greater mix of sites which can be delivered early in the plan period and are attractive to a wide cross section of the market.

Question 2.12: Should greater emphasis in the plan be given to the provision of “aspirational” family housing?

39. Yes, the plan should seek to provide a wide range of housing which appeals to a wide cross-section of the market. This will enable delivery to be increased. The provision of more ‘aspirational’ family housing will also assist the plan vision to attract new residents who aspire to live by the sea and provide an improved range of jobs and homes.

Matter 2c: Five Year Supply of Housing

Question 2.13: Do the SHLAA and five year housing supply calculation (Housing Requirement Technical Paper, June 2014) provide a realistic forecast of the supply of deliverable housing land in the next five years?

40. Both the *Housing Requirements Technical Paper* (ref: EB003) and *SHLAA* (EB007) identify 5.08 years supply from 1st April 2013. This calculation is now somewhat out of date and a further two years of completions have taken place, this information should be provided to indicate the overall supply and five year requirement. The HBF notes that in 2013/14 the net housing completions were -55, this is lower than the anticipated net completions in figure 8 (-27) of the technical paper and as such will have a bearing upon the five year housing land supply requirement.
41. The Council appear to consider that all sites with planning permission or pending a section 106 agreement will be developed. Whilst footnote 11 to NPPF paragraph 47 is noted, it is unlikely that all of the planning permissions within Blackpool are likely to be developed. This is due to a number of reasons, such as speculative applications, site valuations etc. The HBF therefore consider that a more robust calculation would be to apply a discount to the sites with planning permission or awaiting Section 106 sign-off. Ideally this should be based upon previous rates of unimplemented permissions. Without such information a common approach used elsewhere and accepted at a number of planning appeals is to provide a 10% deduction in unimplemented housing permissions to take into account that some commitments may not come forward (eg. Rothley APP/X2410/A/13/2196928 & Honeybourne APP/H1840/A/12/2171339). The supply issue is further exacerbated by the fact that 805 dwellings did not benefit from planning permission at the time of the five year supply calculation, as they were either awaiting approval, SHLAA sites with developer interest or anticipated windfalls. The HBF consider it unrealistic to expect all 805 to gain permission and be built out prior to the end of the five year period.

Question 2.14: Does the five year supply calculation take appropriate account of likely demolitions other than at Queens Park?

42. Whilst it is noted that figure 9 of the *Housing Requirements Technical Paper* (ref: EB003) suggest it is a net figure the only demolitions accounted for appear to be those at Queens Park. The HBF consider that other demolitions outside of the Queens Park proposals should be considered separately as part of the usual background level. Figure 3 of the technical paper indicates that since 2001 there have been 350 recorded demolitions, this equates to approximately 29 per annum. The HBF consider a similar figure should be factored into the five year supply calculations.

Question 2.15: Is it appropriate to seek to address the undersupply from 2012/13 across the rest of the plan period as opposed to in the next five years?

43. No, the HBF consider that any undersupply should be addressed in the next five years. To spread the undersupply over the full plan period will simply mean that the needs of the area are not met until the end of the plan period rather than now. The PPG is clear that;

'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)

44. The advice clearly does not seek to spread the undersupply over the plan period. In addition, as discussed in our matter 1 statement, the Council has not sought assistance from neighbouring authorities to meet its unmet needs and therefore the shortfall should be met within the first five years.

Question 2.16: In addition to the sites identified in the SHLAA, and windfall sites, are there other sites which could realistically deliver housing in the next five years if it were to be determined that the phased approach to housing delivery is inappropriate and/or the Housing Requirement Technical Paper (June 2014) does not convincingly demonstrate that there is a five year supply of deliverable housing land?

45. Whilst the HBF does not wish to promote specific sites or broad locations for growth it is considered that the Council should consider allocating further sites which are economically viable in current market conditions and are attractive to the market. Such sites could complement not compete with the inner urban regeneration sites being promoted by the Council as they would be attractive to a different element of the market.

Matter 2d: Strengthening community well-being, including affordable housing, housing mix and standards and meeting the housing needs of older people, those with special needs and gypsies and travellers

Question 2.17: Are the affordable housing requirements of policy CS14 realistic, deliverable and supported by up to date evidence, including in

relation to viability? (see also Matter 9) Will the plan deliver the affordable housing which is required in the Borough?

46. No, the target for 30% affordable housing across the whole of the plan area is considered unrealistic and unviable in many cases. It is notable that in the conclusions to the Viability Study (ref: EB002) it is recommended that;

‘...The Council should therefore give consideration in respect of the Inner Area to lifting those policies including affordable housing which increase the cost of development over and above national standards’ (paragraph 10.56).

47. It is therefore unclear why the Council would wish to persist with an unsustainable and unjustified policy requirement which is clearly contrary to paragraphs 173 and 174 of the NPPF.

48. The HBF provided further comments upon the targets within our representations upon the Submission Core Strategy. These comments remain valid but are not repeated here to assist brevity.

Question 2.18: Does policy CS14 accord with statements in DCLG’s Planning Practice Guidance concerning the threshold for requiring affordable housing?

49. No, Part 2b of policy CS14 refers to sites of between 3 and 14 dwellings being required to make financial contributions towards off-site affordable housing. This is clearly contrary to the Government’s Ministerial Statement, 28th November 2014, which introduced a national affordable housing threshold of 10 units or development in excess of 1,000m² gross internal floorspace. Within designated rural areas, including national parks, areas of outstanding natural beauty and areas designated by the Secretary of State as being rural a lower 5 unit threshold can be applied. The HBF is not aware that this applies to the areas of Blackpool where a 5 unit threshold is prescribed.

50. The PPG and written Ministerial Statement also provide for vacant building credits. This applies where a vacant building is either brought back into lawful use or is demolished to be replaced by a new building. In such cases a financial credit equivalent to the existing gross floorspace of relevant vacant buildings should be applied (PPG ID: 23b-022-20141128). For example if an 800sqm floorspace building is demolished and the new development has 1000sqm of floorspace, the affordable housing contribution sought should be a fifth of what would normally be sought.

Question 2.19: Does the plan adequately provide for the housing needs of older people and those with special needs?

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

Question 2.20: Does the plan adequately provide for the housing needs of gypsies, travellers and travelling show people?

52. The HBF has no further comments.

Question 2.21: Are policies CS10 (1c) and CS13 (2) compatible with the Government's stated intention of a Building Regulations only approach to setting a range of standards for new housing? Is policy CS13 (2) and its supporting text sufficiently clear about the standards which will be required?

53. The recent ministerial statement by Eric Pickles on 25th March 2015 set out the Government's position in relation to housing standards concerning the construction, internal layout or performance of new dwellings. This has subsequently been complemented by the PPG with regards the implementation of the optional standards within the Building Regulations.

54. Policy CS10 parts 1a to 1c refer to the need to reduce energy by various means including the incorporation of renewable energy provision within schemes. Policy 13 (part 2) relates specifically to housing standards and the supporting text specifically references the Code for Sustainable Homes, Building for Life and Lifetime Homes standards (paragraph 6.24).

55. With regards energy the ministerial statement has clearly expressed that a single standard within the Building Regulations is the only approach to energy requirements and as such local plans should not seek to introduce new standards or require developers to surpass such standards. The requirement for renewable energy provision, or indeed the other elements of part 1, is therefore inappropriate as compliance with the Building Regulations is the only enforceable requirement. The ministerial statement also identifies that the Code for Sustainable Homes has now been withdrawn, the Council may therefore wish to amend the text accordingly.

56. The reference to Lifetime Homes within paragraph 6.24 is also inappropriate as access will also be dealt with through the Building Regulations, albeit with possible optional standards. The Lifetime Homes standard approximates to the proposed Building Regulations Requirement M4(2) (accessible and adaptable dwellings). To implement the optional standard this must be introduced through Local Plan policies (PPG ID 56-002-20150327). The policy must also identify the percentage requirement of dwellings which must meet the optional standard (PPG ID 56-007-20150327). It is therefore inappropriate for the Council to suggest that these additional requirements will be introduced via an SPD (Plan paragraph 6.25). To justify the introduction of the optional access standards the Council must provide evidence the PPG notes that this evidence should include;

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*

- *the overall impact on viability.*
(PPG ID 56-007-20150327)

57. The Council has not provided this evidence and as such cannot justify the introduction of an optional access standard at this stage.

58. Finally with regards Building for Life (BfL), the HBF is supportive of the BfL standard, indeed we are one of the main partners within its production. It is also clear that many of our members actively employ the principles within BfL in site design. It should, however, be recognised that this is not intended to be a mandatory standard for all developments. It is intended to assist the facilitation of discussions. Whilst the plan is not clear with regards how it would implement BfL it is recommended that additional text be provided to indicate that the Council will utilise BfL to facilitate discussions. It should, however, be made clear that individual schemes will be based upon their merits and take account of site characteristics and viability.

Question 2.22: Does policy CS13 provide sufficient flexibility concerning the mix of house types and sizes?

59. No, the HBF consider greater flexibility is required as the current policy will stifle development meeting the characteristics of the site / area, changing market needs and pays no regard to economic viability. Given the inherent delivery problems recently experienced within Blackpool maximum flexibility is encouraged. Further discussion upon this issue is included within our comments upon the Submission Core Strategy, for brevity they are not repeated here.

Matter 2e: Other Housing Matters

Question 2.23: Does policy CS1 adequately and appropriately address the strategic location of all development in Blackpool? Should it also cover the type of development which will be supported/encouraged outside of the Town Centre, Resort Core, Inner Areas and South Blackpool?

60. Yes, the HBF consider that policy CS1 would benefit from additional information to guide development outside of the aforementioned areas. This is particularly relevant within Blackpool given that the Site Allocations and Development Management Policies DPD will not be adopted until June 2018 at the earliest (*Local Development Scheme*; ref: SD014). The inclusion of further indication of where housing and other forms of development would be supported outside of these areas would undoubtedly assist the Council in meeting its housing requirements earlier in the plan period.

Question 2.24: Does policy CS12 adequately address the heritage value of inner area neighbourhoods?

61. The HBF has no further comments.

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