

BLACKPOOL LOCAL PLAN

PART 1: CORE STRATEGY

BLACKPOOL COUNCIL STATEMENT

MATTER 2

HOUSING, HEALTH AND EDUCATION

APRIL 2015

Blackpool Council



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Matter 2 – Housing, Health and Education

(Policies CS1, CS2, CS12, CS13, CS14, CS15, CS16)

Participants: Blackpool BC, Home Builders Federation, NS&I/Rowland Homes

Introduction

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (SD001).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the Core Strategy. To assist document numbers are referenced where appropriate.

Position of the Council regarding Matter 2

2a Objectively Assessed Need for Housing

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?

2.1.1 The Fylde Coast SHMA (February 2014) (EB004) complies with the National Planning Policy Framework (NPPF) and aligns with key requirements of the new national planning guidance (PPG). Although it was produced in advance of the final iteration of the PPG, it is noted that the content of the final PPG largely reflects the draft PPG in advising on how housing needs should be assessed. The SHMA was prepared following the publication of the draft PPG and makes reference to emerging guidance throughout, as well as the previous 2007 DCLG SHMA Guidance (2007) which continued to be in place. In particular the SHMA aligns with key requirements of the PPG including:

- The consideration of needs across functional housing market areas, defined by household demand and preferences. The level of containment within the housing market area was assessed in accordance with the PPG, through analysis of migration and commuting flows in particular;
- Analysis of official population and household projections published by ONS and DCLG respectively which are advocated as a 'starting point' for assessing housing need in the PPG;
- Testing of adjustments of official projections based on specific local circumstances, including development of a range of migration-led alternative scenarios;

- Taking employment trends into account, based on historic employment trends and economic forecasts, produced by Oxford Economics and Experian. Additional economic sensitivities were also tested based on alternative assumptions around improved economic activity rates in Blackpool linked to wider programmes of regeneration;
- Consideration of a range of market signals, through analysis of the active housing market in section 6;
- Assessing the needs for all types of housing, including specific needs related to older people, households with support needs and BME households; and
- Assessment of the need for affordable housing, through calculating current unmet need and projecting future housing need, relative to the current supply of stock. The methodology for assessing affordable housing need has largely been retained from the previous 2007 DCLG SHMA Guidance.

2.1.2 In arriving at an evidenced position on the overall scale of objectively assessed housing need for each Fylde Coast authority, the Fylde Coast SHMA sets out a clear methodological approach which is based on up-to-date facts and unbiased evidence available at the time. Due to the complexities of the housing market and the various factors and assumptions which feed into the modelling of future needs, the SHMA does not identify a single number as conclusively representing the objectively assessed housing needs for Blackpool. Instead, it concludes with a recommended range and objectively assesses the different scenarios of need within this range, drawing together all evidence in the report. The methodology, analysis and findings are clearly stated and robustly justified in the Fylde Coast SHMA and considered in Blackpool's Housing Requirement Technical Paper (June 2014) (EB003).

2.1.3 Analysis of the 2012-based ONS population projections, which were released after the SHMA was published, and how they impact on this range is considered in the Fylde Coast SHMA Addendum Report (November 2014) (EB005). In addition, analysis of the 2012-based DCLG household projections and how they impact on this range is considered in the Edge Analytics 2015 report (FEB002) together with the 'Considering the Implications of the 2012 SNHP' Briefing Note (Turley 2015) (FEB003). See matter 2.4 for further discussion.

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?

2.2.1 The NPPF and PPG highlight the importance of aligning housing provision with the likely assessed change in job numbers. Paragraph 158 of the NPPF clearly sets out that evidence and strategies for housing and employment in local plans should align with one another: 'Local planning authorities should ensure that their assessments of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'. In establishing future need for housing, the PPG

states that this is not an exact science and sets out a general methodology for plan makers to follow. In doing so, it advises that housing needs assessments should have regard to future employment (paragraph 18).

2.2.2 The Fylde Coast SHMA (February 2014) (EB004) produces a number of demographic-led and employment-led scenarios, which are used to define the range of objectively assessed need. In considering the appropriate assessment of need within this range, the SHMA analysis recommends that further reference is made to three criteria:

- Would they accommodate projected levels of population growth associated with changes to the existing population and future anticipated levels of migration?
- Would they support economic growth, and in particular accommodate the labour force required to take up the changing number of employment opportunities?
- Would they facilitate the development of a sustainable mix of tenures, including sufficient affordable housing, to meet the needs of all households in the future and therefore respond to market signals?

2.2.3 For Blackpool, the SHMA recommends that the further work being undertaken to examine the local economy will be important to underpin the assessment of housing need. The need to consider economic and market signals in choosing a housing figure is reiterated in the Fylde Coast SHMA Addendum Report (EB005).

2.2.4 Blackpool's distinct and complex challenges regarding its housing market and the dynamics of its local economy are well documented at national level; and clearly the importance of underpinning identified housing need with economic prosperity and local jobs is critical. However, whilst defining the link between homes and economic growth as the primary consideration, the Council has also given consideration to how basing the assessment of need on an employment-led forecast meets other identified needs evidenced in the SHMA.

2.2.5 In particular, the figure of 280dpa is considered to be of a sufficient scale to accommodate population growth comparative to the demographic-led projections taken from the SHMA and applied to the plan period; and to enable sustainable tenures to form, which includes making progress in addressing Blackpool's affordable housing need to avoid exacerbating affordability issues. This analysis is evidenced in the Housing Requirement Technical Paper (EB003). Furthermore, the housing figure represents a significant uplift from the 2012 SNHP starting point predictions for Blackpool which are presented in the Edge Analytics 2015 report (FEB002) together with the 'Considering the Implications of the 2012 SNHP' Briefing Note (Turley) (FEB003). See Matter 2.4 for further detail on this.

2.2.6 Given there is no exact science to establishing future need, the Council believes the analysis which has been undertaken and has ultimately led to its decision to base the assessment of need primarily on an employment-led forecast, is robust and fully in accordance with the NPPF and PPG.

(b) to give greater weight to the Oxford Economics forecasts of jobs growth than to the Experian forecasts?

- 2.2.7 As a continuation of the Fylde Coast SHMA analysis (EB004), further work has been carried out which focuses on the employment-led forecasts in the SHMA to verify if they are considered to provide representative and realistic scenarios; consider whether, given Blackpool's local labour market conditions, reasonable assumptions were used in producing the core and sensitivity scenarios set out in the SHMA; and recommend issues that should be considered in assessing the likely level of housing need. This further work is contained in the document 'Towards an Objective Assessment of Housing Need in Blackpool: Analysis of Economic and Housing Forecasts' (AMION Consulting, May 2014) (EB006).
- 2.2.8 Developing this robust analysis on the likely change in job numbers is supported by paragraph 18 of the PPG. The AMION Study considers that, despite their variances, both sets of employment-led projections are considered to provide representative and realistic forecasts for the purposes of identifying future housing need. However, in-depth analysis of the assumptions which underpin the individual forecasts suggest the Oxford Economic forecast to be more reasonable.
- 2.2.9 In particular, whilst the Oxford Economics forecast assumes an overall reduction in the number of jobs over the plan period, the sectoral forecasts showing notable growth align with Blackpool's strengths and current local strategies to support a stronger, more resilient and diversified economy; while the decline in public sector employment reflects government policies and local expectations. Also, while both forecasts expect Blackpool to perform better in terms of employment change than previous periods, the Experian forecasts are significantly more optimistic compared to what has been achieved over the last 17 years. This optimism is also reflected in their historic employment forecasts between 2009 and 2012, with the % change historic forecast by Oxford Economics closer aligned to published statistics. The underlying view is that a high level of job growth forecast by Experian is not considered achievable or appropriate for Blackpool.
- 2.2.10 Importantly, the AMION Study also analyses the level of population growth supported by the two employment-led forecasts compared to the demographic-led forecasts modelled in the SHMA. Both employment-led forecasts result in much higher population growth compared to the migration-led demographic scenarios, while the Oxford Economics forecast is comparable to the re-based SNPP 2010 forecast, with both expected to result in population growth of 5% in Blackpool, of which 70% is net migration. In comparison, the Experian forecast is expected to result in population growth of 8%, of which 79% is net migration. The level of population growth (including net migration) under the Oxford Economics forecast is therefore closer aligned to the highest level of population growth predicted by the demographic-led scenarios over the plan period. It is also important to consider this modest level of growth within the context of long term population trends in Blackpool, with very low population growth / decline evidenced in the Fylde Coast SHMA.

2.2.11 The Council considers its decision to give greater weight to the Oxford Economics forecast over the Experian forecast is based on robust analysis, which concludes that the Oxford Economics forecast is the most reasonable and achievable for Blackpool. It would provide housing of a sufficient scale to deliver economic growth and prosperity; support population growth over the plan period comparative to demographic-led forecasts modelled in the SHMA; and make progress in addressing Blackpool's affordable housing need (set out in other matters below).

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

2.2.12 The SHMA modelling (EB004) is prudent regarding the application of headship rates, building in higher headship rates than suggested by the 2011-based ONS release. It takes a mid-point between the 2008 and 2011 SNHP rates to provide a balanced position regarding the historically derived trends implied by both. This ensures that a 'suppressed' position reflecting an unprecedented set of market and economic conditions nationally is not projected forward over the plan period meaning, to an extent at least, there is an assumption that any backlog of need emerges as future growth and is not simply unaccounted for. The implication of the release of the 2012-based SNHP dataset is considered in matter 2.4.

2.2.13 Whilst the SHMA modelling does not directly take into account any allowance for unmet housing need (backlog), it advises that the Council gives consideration to evidence on market dynamics in determining its assessment of need as required by the PPG. The Housing Requirement Technical Paper (paras 3.35 - 3.47 in particular) (EB003) accordingly considers a number of the PPG 'market signals' indicators evidenced in sections 4 and 6 of the Fylde Coast SHMA when assessing Blackpool's housing need. This has enabled the Council to determine whether household formation rates have been constrained by supply and therefore whether an adjustment is necessary.

2.2.14 'Active market' evidence including house prices, affordability and rents, together with evidence of overcrowding, rates of development and vacancy levels taken from the SHMA shows that household formation rates in Blackpool have not been constrained by lack of housing development / land supply but by lack of demand for new homes.

2.2.15 Within the SHMA, Section 6 shows very low house prices in Blackpool as well as lower market and social rents than elsewhere in the Fylde Coast. It is cheaper to purchase a property than enter the rental market. Affordability issues are symptomatic of low average household income. Section 4 shows an increase in vacancy rates with Blackpool having the highest level of long-term empty properties and whilst overcrowding is higher compared to other Fylde Coast authorities it remains lower than the national average.

2.2.16 Evidence of historic supply shows low build rate trends and a lack of appetite from developers to bring housing forward symptomatic of Blackpool's complex housing market

and distinct economic and social challenges. Low household formation rates compared to the level of new homes delivered corresponds with an increase in vacancy rates and high numbers of empty homes, concurrent with population decline. This further suggests that household formation rates have not been constrained by the scale of supply.

2.2.17 Therefore, in accordance with paragraph 15 of the PPG, it is the Council's view that there is no evidence to suggest that an upward adjustment to the SHMA modelling is required, or that household formation rates have been suppressed by supply. With regards to worsening affordability of housing, the calculation of affordable housing need in the SHMA takes account of addressing a backlog associated with this tenure.

2.2.18 The Council is intending to prepare an updated analysis of market signals before the Core Strategy Examination.

2.2.19 Notwithstanding there being no requirement for an adjustment, the Housing Requirement Technical Paper considers the consequence of having to address any unmet need within the context of Blackpool's complex local housing market and challenging economy, and why it would not be appropriate in these circumstances to address backlog within the plan period. It also considers the positive 20% buffer being applied to Blackpool's five year land supply in order to provide more certainty over site delivery in the early part of the plan period to help meet housing need.

(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?

2.2.20 The analysis on Blackpool's economy in the AMION Study (EB006) and Housing Requirement Technical Paper (EB003) draws on the impact of unique in-migration trends and the resultant complex housing market and challenging socio-economic issues, to support the underlying need for economic prosperity to have an important bearing on need. However, notwithstanding the qualitative nature of in-migration trends, in selecting which of the forecasts modelled in the SHMA (EB004) is most appropriate to meet future need, analysis in the AMION Study and Housing Requirement Technical Paper is based on the (quantitative) level of net migration shown by the different forecasts. The Council therefore considers it has followed the general methodology set out in the PPG.

2.2.21 Despite the Oxford Economics forecast modelled in the SHMA showing a decrease in the overall number of jobs, a forecast decrease in the labour force means that in-migration is needed to balance the labour market, with net migration accounting for 70% of the 5% population increase for 2012-2027. This population growth and level of net migration over the plan period is comparable to the highest demographic-led SNPP-2010 forecast over the same period. In comparison, the Experian forecast modelled in the SHMA shows net migration accounting for 79% of the 8% population increase for 2012-2027. Linking the alternative levels of net migration to economic prosperity as well as meeting future population need evidenced in the SHMA, the Oxford Economics forecast would help to

improve economic activity rates. It assumes a reduced level of in-migration compared to long-term trends and the Experian forecast, providing more opportunities for the existing population to engage in the labour market. The AMION study considers this take-up of jobs by the existing population to be achievable and this complements wider local strategies which are ongoing to improve economic activity levels.

2.2.22 As an aside issue and in addition to the main analysis on why the Oxford Economics forecast is considered to be the most appropriate on which to base Blackpool's future housing need, the Housing Requirement Technical Paper also considers why the non-standard nature of Blackpool's migration trends evidenced in the SHMA supports the more cautious net migration levels shown in the Oxford Economics forecast compared to Experian. However, whilst the Council has given some consideration to this evidence as part of its analysis, it is important to note this has not been the deciding factor used to establish future need. This is illustrated by the fact that only one paragraph (3.33) is dedicated to the issue in Chapter 3 of the Housing Requirement Technical Paper, which sits at the end of the main analysis/conclusions on assessed housing need. The Council has attempted to simplify this aside issue in the supporting text to Policy CS2, however realises on reflection this has caused some unintended confusion and therefore proposes this be deleted (minor modification MM006).

(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)

2.2.23 The AMION Study (EB006) develops robust and in-depth analysis on why the Oxford Economics forecast is considered to be a representative, realistic and reasonable forecast for the purposes of identifying future housing need. This analysis on the likely change in job numbers based on past trends and economic forecasts in assessing housing need is supported by paragraph 18 of the PPG. Whilst the Oxford Economics forecast modelled in the SHMA assumes an overall reduction in the number of jobs over the plan period, the analysis considers that it will support economic growth in certain sustainable employment sectors, representing an improvement on past economic trends in Blackpool over the last ten years, and align with committed strategies to support a stronger, more resilient and diversified economy. Further analysis is set out within the AMION Study (EB006) and Housing Requirement Technical Paper (EB003).

2.2.24 The assessment of need is based on realistic assumptions on number of new jobs and despite an overall reduction in job levels over the plan period, growth in sustainable employment sectors is considered to be consistent with the requirement for future employment land to support a stronger, more resilient and diversified economy, with new jobs to help replace the significant number of public sector jobs expected to be lost, as well as part-time, low-wage seasonal jobs. Using long-term take-up rates to calculate future employment land is therefore a realistic approach to help achieve the economic objectives

for the Borough, as opposed to alternative methods which would reduce employment land supply. The approach also provides more flexibility to be able to allow the redevelopment of some of Blackpool's older employment estates, to secure their long-term future as sustainable employment locations. This issue is discussed further in Matter 3.

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

2.2.25 The Housing Requirement Technical Paper (EB003) develops the SHMA analysis (EB004) and evidence from the AMION Study (EB006) to assess the impact of delivering different levels of housing within the range identified in the SHMA on meeting Blackpool's housing need. This is based on three key criteria recommended in the SHMA (set out in matter 2.2(a) above).

2.2.26 Notwithstanding the figure being towards the lower end of the range indicated in the SHMA, robust evidence is drawn on in the analysis to demonstrate that a housing figure of 280 dpa is of a sufficient scale to meet Blackpool's housing need, underpinning housing need with economic prosperity as the primary consideration but also giving due consideration to other aspects of identified need evidenced in the SHMA. It is comparative to the level of growth predicted by the SNPP-2010 based trend for the plan period and is significantly above the SNHP-2012 based prediction evidenced in the Edge Analytics 2015 Report (FEB002).

2.2.27 The benefits and disbenefits of delivering alternative levels of housing at the highest and lowest ends of the SHMA range on meeting future need is also drawn on as a comparison to help contextualise the analysis and conclusions made in the Housing Requirement Technical Paper.

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

2.2.28 The evolution of Blackpool's housing figure within the context of old regional housing targets contained within the now revoked RSS is dealt with in Chapter 2 of the Housing Requirement Technical Paper (EB003). This includes background information on why a significantly higher RSS figure for Blackpool was chosen in comparison to previous housing targets contained in the Joint Lancashire Structure Plan, which at the time were based on local strategic growth ambitions. Evidence which underpinned the setting of Blackpool RSS figure is now out-of-date and no longer relevant. This approach (that the now revoked Regional Strategy is no longer relevant to housing need or housing targets) is consistent with legal judgements and Inspector's advice in recent years as well as the Planning Advisory Service technical advice note on objectively assessed need.

(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?

2.2.29 The SHMA analysis (EB004) confirms that the level of housing required to meet Blackpool's affordable housing need in full over the next five years is far in excess of any single year's provision as seen over the last ten years, and therefore this level of need should not be

reasonably expected to be realised. In reality, as it is unlikely that all of the need for affordable housing can be met through the provision of additional affordable homes, the SHMA considers that some of this need will need to be met through alternatives, such as the private rented sector subsidised through Housing Benefit.

- 2.2.30 Importantly, the role of this tenure has not been factored in when calculating the net need figure for affordable housing. In calculating this need, the SHMA methodology is comparable to the previous SHMA and uses the 'steps' set out within the PPG. As the private rented sector is not classified as affordable housing in the NPPF, it has not been included within this standard methodology. However, evidence shows that in reality it will continue to play a significant role in meeting a proportion of need going forward, as will housing intervention measures by the Council and its partners.
- 2.2.31 Therefore notwithstanding the level of need calculated using the standard SHMA methodology, the reality is that when taking Blackpool's circumstances into account, the identified housing need is considered to be of a sufficient scale to avoid exacerbating affordability issues. This evidence is considered in more detail in the 2014 Housing Requirement Technical Paper (EB003).
- 2.2.32 It is important to note that the Fylde Coast SHMA Addendum Report (EB005) includes a re-calculation of the affordable housing need. For Blackpool, the net annual need has increased slightly from 264 to 272 affordable homes per year. Further detail on this change is set out in matter 2.4. The Council does not consider that the modest increase in Blackpool's affordable housing need as shown in the Addendum Report conflicts with the analysis on overall housing need and its ability to address affordability issues in the context of other strategies being adopted, further detail of which is set out in the Housing Requirement Technical Paper.
- 2.2.33 With respect to 'market signals' the SHMA includes a full assessment of the active housing market in the Fylde Coast for the three individual authorities, with demand pressures (market signals) taken into account when the scenarios are evaluated. For Blackpool this analysis on market and economic conditions is developed further in the AMION Study (EB006) and Housing Requirement Technical Paper in accordance with the requirement of paragraph 19 of the PPG, including consideration of economic factors, affordability and historic supply against demand or need. This analysis is previously discussed under matter 2.2(c) above. In drawing together the analysis, this suggests that in the pre-2012 period (on which the 280 dpa housing figure is based) household formation was constrained by a lack of demand for new homes rather than supply, and therefore there is no evidence to support an upward adjustment to the housing figure.
- 2.2.34 The issue of 'market signals' within the context of the release of the 2012-SNHP dataset is identified in the 'Considering the Implications of the 2012 SNHP – Blackpool' (Turley 2015) (FE003). As a follow-up the Council intends to prepare updated analysis of market signals before the Core Strategy Examination.

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?

2.3.1 Sensitivity testing of an improved economic activity rate specifically in Blackpool was undertaken in the Fylde Coast SHMA (EB004) for illustrative purposes to demonstrate the impact of the Council being successful in its ambition to improve labour-force circumstances over the plan period on housing need. The SHMA advises any reliance on this (or other improving economic conditions) should be supported by robust evidence. Further work developed in the AMION Study (EB006), which includes analysis of labour market conditions, does not consider there is sufficient local evidence to reasonably propose adjustments to the economic activity rates, unemployment rates and commuting ratios used in the SHMA for Blackpool alone. Therefore, this SHMA sensitivity testing is not developed further.

2.3.2 In analysing the impact of improving economic activity rates, the AMION Study highlights that if local supply side factors were to adjust positively to additional jobs being available locally, then fewer in-migrants would be needed. If this were to be realised (although of no bearing in the assessment of need), then this would not conflict with the selection of a figure which assumes more cautious net migration levels compared to the Experian forecast.

2.3.3 Notwithstanding there being no evidence to support SHMA sensitivity testing of improved economic activity levels for Blackpool alone, in reviewing the implications of the 2012 Sub National Household Projections (SNHP), the Edge Analytics 2015 Report (FEB002) includes employment-led scenarios with improved unemployment rates. This is shown as it is becoming increasingly standard on the basis of continued national improvements to this indicator to include an allowance for this in modelling housing need. Further consideration to this is given in Matter 2.4, although it is recognised that this sensitivity was not included in the original range of housing need identified within the SHMA.

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?

2012-based ONS Population Projections

2.4.1 Following the publication in February 2014 of the Fylde Coast Strategic Housing Market Assessment (SHMA) (EB004), official 2012-based sub national population projections (SNPP) prepared by the ONS were released (May 2014). The release of this dataset represents an important update to the range of information considered within the SHMA with the Government's Planning Practice Guidance (PPG) highlighting that such official projections should be a starting point in assessing housing need.

- 2.4.2 The Fylde Coast Authorities commissioned Turley consultants to produce an Addendum (EB005) to the original SHMA to be read alongside the analysis presented in the SHMA. This Addendum was requested to establish the implications of the 2012-based SNPP on the conclusions of the SHMA and in particular the range of objectively assessed need for each authority arrived at in the study.
- 2.4.3 The Addendum findings are that the 2012-based SNPP have a relatively low level of housing need compared to other modelled scenarios. For Blackpool the resultant housing need is 98 dwellings per annum (dpa). This falls significantly below the range of objectively assessed needs identified in the SHMA which lie between a range of approximately 250 and 400 dpa over the period 2011-2030.
- 2.4.4 The Addendum report highlights that locally the population growth implied by the 2012-based SNPP is considered to reflect more recent lower levels of migration into the authority which are likely to have been impacted by a range of factors. These factors include the impact of the economic downturn and recession, which has seen lower average rates of house building, as well as a reduction in employment opportunities locally over this period. These factors are considered to have likely impacted on both the level of population growth associated with migration levels as well as the rate at which households have been able to form.
- 2.4.5 In response to this, the Addendum analysis has included an updated projection which projects future population growth on the basis of a longer-term ten year period. This projects a higher level of population growth in the future taking into account a higher level of assumed migration into Blackpool taking into account higher rates of migration seen prior to the last five or six years.
- 2.4.6 This longer term scenario derives an average annual dwelling requirement of between 241 and 289 dpa (depending on inclusion of the unattributable population change). This is some 143 to 191 dpa higher than the 2012-based SNPP dataset would imply.
- 2.4.7 The SHMA highlights the importance of the link between housing provision and job growth in the area. The population projections show an ageing of the population which has an impact on the size of the labour-force in the future. The analysis identifies that if Blackpool's housing provision was to align with the lower levels of projected population change in the 2012-based SNPP dataset this would result in a fall in the size of the available labour-force by 2030. This would potentially mean that the level of jobs which could be supported in the authority would fall by around 4,100. This would conflict with Core Strategy objectives and local strategies to support a more robust and strengthened local economy together with improved skill levels and aspirations for Blackpool residents.
- 2.4.8 The SHMA considers a number of economic forecast employment-led scenarios which produced a range of housing requirements. The analysis in the Addendum report has re-modelled the implied need for housing associated with these employment forecasts, re-basing the analysis to 2013 and taking into account updated data relating to commuting and economic activity rates. The implied housing need under the employment-led scenarios for

2011-2030 is projected to be 255 dpa under the Oxford Economics scenario and 366 dpa under the Experian 2013 scenario. In addition the Addendum explores the impact of assuming that unemployment falls to pre-recession levels and finds that this would result in a lower dwelling requirement of 174 dpa (Oxford Economic) and 282 dpa (Experian 2013). This reduction in unemployment levels is not unreasonable to assume when considering the local strategies being pursued to encourage residents to engage in the labour market and the alignment between future supply and demand of skill levels .

- 2.4.9 Taking into account the impacts of the modelling, the Addendum concludes that the OAN range for Blackpool identified in the SHMA of 250-400 dwellings per year over the period 2011-30 remains appropriate.
- 2.4.10 With respect to affordable housing, for Blackpool the net annual need has increased slightly from 264 to 272 affordable homes per year. The change in the requirement is due to a slight change in methodology which is closer aligned to the recommended approach identified in the PPG as highlighted below.
- 2.4.11 The biggest driver of affordable housing need in the official methodology is the number of future households that are likely not to be able to afford to meet their own needs in the market. The Addendum translates the 2012-based SNPP into a gross household formation rate for those households aged 15-44 and looks at the proportion of new households who could not afford market housing without assistance using a reasonable proportion of income. This results in a slightly higher level of household growth and therefore affordable housing need than the SHMA identified, which used a scenario based solely on natural change and did not take into account in-migration. The Council does not consider that the modest increase in Blackpool's affordable housing requirement as set out in the Addendum contradicts with the analysis on overall housing need and its ability to address affordability issues when taking into account its wider housing strategy approach, further detail of which is set out in the 2014 Housing Requirement Technical Paper (EB0033).
- 2.4.12 In conclusion, the Addendum considers the implication of the 2012-based SNPP and presents a range of average annual housing needs for Blackpool for 2011- 2030, most of which fall within the previous range of 250 – 400 per year. It is therefore considered that the recommended range of OAN in the SHMA remains broadly relevant. This further work recognises the potential impact of the recent economic and demographic context and supports a housing figure which will accommodate higher levels of population growth than that suggested by the 2012-based SNPP. The Council therefore considers that its proposed housing requirement figure of 280 dpa on average over the plan period, which is justified in the Housing Requirement Technical Paper, remains appropriate.

2012-based DCLG Household Projections

- 2.4.13 Turley consultants were commissioned by Blackpool Council to review the implications of the 2012 Sub National Household Projections (SNHP) released by the DCLG on the 27th February 2015 on the objectively assessed need (OAN) range identified in the 2013 SHMA

(EB004). Turley responded in setting out their review in a Briefing Note (FEB001) which was received 21 April 2015.

- 2.4.14 In preparing the Briefing Note, Turley have drawn on the analysis undertaken by Edge Analytics for Blackpool Council, presented in the paper titled 'Blackpool Demographic Analysis & Forecasts – Evaluating the impact of the 2012-based DCLG household projections' (April 2015) (FEB002).
- 2.4.15 Turley identify the 2012 SNHP as providing the 'starting point' for the estimate of overall housing need in accordance with the PPG (amended in March 2015). The new dataset implies the need for 151 dpa in Blackpool over the period 2011-30. It is important to note that this is a considerably lower level of projected need than the range in the SHMA and indeed the housing figure proposed in the Core Strategy of 280 dpa, with this figure representing an uplift of 85% from the 2012 SNHP starting point.
- 2.4.16 Before going on to consider the implications of the Edge Analytics modelling of the 2012 SNHP, the Briefing Note highlights that whilst the latest available information is important to consider, it does not mean that housing assessments are rendered out-dated every time new projections are released (PPG housing and economic development needs para16).
- 2.4.17 The direct application of the 2012 SNHP headship rates to the scenarios considered within the 2013 SHMA and 2014 SHMA Addendum (EB005) would suggest an adjusted OAN range of between 286 and 423 dpa over the period 2011-30 (FEB002 Table 5 page 19). Whilst this represents an uplift to the OAN range presented within the 2013 SHMA and validated within the 2014 SHMA Addendum it is important to recognise that this also needs to be considered in the context of the updated references in the PPG to the 2012 SNHP forming the 'starting point' for the assessment of need. Indeed the full range of scenarios in Table 5 shows the SNPP–2012 scenario with a requirement of 151 dpa. It also shows the Jobs led Oxford UR scenario which includes an improvement to unemployment rates, as it is becoming increasingly standard on the basis of continued national improvements to this indicator to include an allowance for this in modelling housing need. This scenario suggests a notably lower level of implied housing need of 227 dpa although it is noted that this sensitivity was not included in the OAN range identified in the SHMA.
- 2.4.18 Turley advise that the scale of uplift in the implied housing need range (both in relation to the official SNHP projections as the starting point and the previous OAN range identified in the SHMA) needs to be considered cautiously in the context of the fact that historically, Blackpool has experienced a longer term population decline and poorly-performing economy, as highlighted in the 2013 SHMA and 2014 Addendum. Positive migration and household formation will therefore need to be underpinned by a notably more positive economic context than that seen in recent years in Blackpool as well as being supported through the provision of a balanced stock of housing. Further consideration of these issues is set out in the Housing Requirement Technical Paper (EB003).
- 2.4.19 It is also apparent that the relationship between household formation and housing supply is not straightforward or necessarily direct in Blackpool given the distinct operation of large

parts of its housing market, in particular the inner Blackpool area. This is reflected in high levels of vacancy, sustained low house prices and smaller average household sizes associated strongly with the supply of housing, which the Council is looking to rebalance to enable sustainable communities to form.

- 2.4.20 Whilst Turley recognise the limited time available to interrogate the new dataset, in the context of the above they highlight it is important to reflect on the evidence implied by the analysis of the active market and market signals in the 2013 SHMA.
- 2.4.21 Nationally it is apparent that the number of completed dwellings annually has fallen notably short of projected levels of need (under the 2012 SNHP as well as earlier datasets) with the impact likely to have been a suppression of household formation rates of younger age groups in particular, with this illustrated through a range of worsening market signals at a national level. This would suggest the potential need for some adjustment to household formation rates in order to depart from a continuation of this trend.
- 2.4.22 At a basic level in Blackpool it is evident, between the last two Census years, that the number of households in Blackpool has risen at a notably lower rate (growth of 0.7%) than the number of dwellings (2.9% growth) . This provides a strong indication that the supply of property has not been suppressing rates of household formation directly locally. Evidence of rising vacancy levels within the existing stock also serves to reinforce this point. The 2013 SHMA identified an increase in total vacant household spaces from 5% in 2001 to 7.2% in 2011 with almost 5,000 vacant household spaces in the authority according to the 2011 Census (Figure 4.9). The SHMA also considered the numbers of long-term vacant properties (vacant for more than 6 months) rising from 1,335 in October 2012 to 1,473 in October 2013 (Figure 4.8).
- 2.4.23 In addition to the above supply factors the analysis of house price change, an important potential indicator of demand, showed that prices had dropped in Blackpool from 2008 with the rate of growth falling below the other authorities in the Fylde Coast and the national level (2013 SHMA Figure 6.1). Whilst the authority had a higher level of overcrowding than the other Fylde Coast authorities, this was substantially less than the national average, and was also likely to reflect the stock profile which indicated fewer bedrooms per household than the other comparator areas and the national picture.
- 2.4.24 The above factors would suggest that, whilst the 2011 SNHP represented a notable picture of household suppression which required a level of adjustment the same is not true of the 2012 SNHP dataset for Blackpool, which project forward rates more closely aligned to the 2008 SNHP model This is likely to reflect the comparative low pricing and availability of smaller, cheaper property in the authority and suggests little grounds, on the basis of the evidence available, to suggest that the household formation rates underpinning the 2012 SNHP reflect the consequences of past under-supply or worsening affordability of housing in the authority.
- 2.4.25 The modelling undertaken by Edge Analytics within the 2013 SHMA and 2014 Addendum sought to address the uncertainty surrounding rates of household formation and the

limitations of the 2011-based interim household projection model through the application of a mid-point between the scenario outcomes of the application of assumptions from the two latest household projection datasets available at the time (the 2008-based and 2011-based interim models). The release of the new 2012 dataset represents an important update enabling a new translation of projected population growth into households using the POPGROUP model. The 2015 Edge Analytics report and the Turley Briefing Note has not sought, on the basis of the data available, to consider in full the implications of the adjustments to headship rates in the context of the operation of the Blackpool housing market or indeed the other adjustments relating to underlying population growth applied within the SHMA in arriving at the OAN range.

- 2.4.26 The Briefing Note advises that the implied adjusted OAN range of 286 dwellings per annum to 423 dwellings per annum resulting from the application of 2012 SNHP headship rates should, on the basis of the points above, be considered with a degree of caution as a direct replacement or update of the previous range identified within the 2013 SHMA and the 2014 Addendum.
- 2.4.27 It is the intention of the Council to provide an updated analysis with respect to market signals prior to the Examination.
- 2.4.28 From this Briefing Note the Council has considered a number of important points in determining that its proposed housing figure of 280 dpa remains appropriate:
- PPG now requires the 2012 SNHP to provide the 'starting point' for the estimate of overall housing need. For Blackpool this implies a need for 151 dpa over the period 2011-30. This is a considerably lower level of projected need than the range in the SHMA and indeed the housing figure proposed in the Core Strategy;
 - The suggested adjusted OAN range of between 286 and 423 dpa over the period 2011-30 is only marginally higher than the OAN range in the SHMA (with the figure of 286 dpa at the bottom end of this range only marginally higher than the proposed housing figure of 280 dpa) and indeed the full range of scenarios includes the SNHP–2012 scenario with a requirement of 151 dpa and the Jobs led Oxford UR scenario with a requirement of 227 dpa;
 - The scale of uplift in the implied housing need range needs to be considered cautiously in the context of the fact that historically, Blackpool has seen a long picture of population decline and a comparatively poorly-performing economy, as highlighted in the 2013 SHMA and 2014 Addendum;
 - It is apparent that the relationship between household formation and housing supply is not straightforward or necessarily direct in Blackpool given the distinct operation of large parts of its housing market, in particular the inner Blackpool area.;
 - The 2015 Edge Analytics report and this accompanying note has not sought, on the basis of the time and data available, to consider in full the implications of the adjustments to headship rates in the context of the operation of the Blackpool

housing market. Blackpool Council intends to provide an update to market signals prior to the Examination;

- Whilst this latest available information (2012 SNHP) is important, it does not mean that housing assessments are rendered out-dated every time new projections are released. In Blackpool's case these assessments have been informed by extremely robust analysis of need.

2.4.29 In the context of the above and specifically in relation to the operation of the housing market, the Council considers it is worth stating that with respect to the target figure of 280 dpa in the Core Strategy no individual housebuilder that is active in the Housing Market Area has submitted a representation objecting to this proposed target figure.

2b The Housing Target and Trajectory

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?

2.5.1 Yes, because this figure is considered to be of a sufficient scale to meet Blackpool's objectively assessed housing need and there is no evidence to support an upward adjustment to this assessed need (dealt with in Matter 2a). This level of housing is considered realistic and sustainable to deliver, taking account of market signals including past development trends / housing completion rates, development viability and the available capacity of land. Furthermore there is no evidence to suggest that Blackpool's housing target is required to accommodate any unmet need from neighbouring authorities in the housing market area (dealt with in Matter 1).

2.5.2 Paragraph 158 of the NPPF requires local planning authorities to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Accordingly, the figure is informed by robust and proportionate evidence, which is drawn together in the Housing Requirement Technical Paper (June 2014) (EB003). The impact of delivering this level of housing on achieving sustainable development, creating sustainable communities and aligning with plan objectives and local priorities, including supporting economic, housing and health strategies in Blackpool, is also analysed in the Housing Requirement Technical Paper to support the setting of this figure.

2.5.3 When considering housing completions over a sustained period, the total (net) delivery rate for new build and conversions on average is 267 dpa since 1991 and 243 dpa since 2003. During the economic downturn, this has reduced to 176 dpa since 2008. Development activity by the public sector to support these completion rates is evident, particularly since 2003. Applying the 176 – 267 dpa range of historic completion rates to a 15 year period would equate to the delivery of 2640 - 4005 dwellings. In comparison, an average figure of 280 dpa will deliver 4200 dwellings over the 15 year plan period. Within the context of

Blackpool's low delivery rates, this proposed target is considered to represent a sustainable boost of housing supply in line with paragraph 47 of the NPPF.

2.5.4 Whilst the economic situation remains uncertain, particularly in the early part of the plan period, historic trends suggest that Blackpool is able to deliver around 250 - 270 dpa on average over a sustained period, and has the potential to deliver around 300 dpa during more buoyant periods of economic prosperity. Accordingly, a figure of 280 dpa on average over the plan period is considered to be aspirational yet realistic. Further detail on supply and delivery is set out in the Housing Requirement Technical Paper.

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)

2.6.1 The evidence supports the delivery of 4200 new homes (280 dpa on average) as a soundly based figure for Blackpool's housing target. On that basis the Council considers that policy CS2 should refer to “delivery of 4200 new homes” as proposed by MM05. Removing the word “around” helps to provide clarification of the target and removes any unintended confusion. As it is not a minimum target, the Council does not consider it is appropriate to state at “least”. Furthermore, the latest SNHP-2012 based prediction, which the PPG states should provide the ‘starting point’ for the estimate of overall housing need, implies the need for 151 dpa in Blackpool over the period 2011 – 2030 which is significantly below this target.

2.6.2 In the event of under-delivery against this target or if implementation is not on track to meet the latest assessment of need, this will be addressed through future monitoring of the Core Strategy and Local Plan reviews as appropriate. The issue of future monitoring is dealt with in Matters 1 and 9.

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

2.7.1 The 2013 SHLAA update (EB007) presents the most up-to-date assessment of supply. It has been prepared in accordance with the requirements of paragraph 47 of the NPPF in that it:

- identifies a supply of specific deliverable sites sufficient to provide five years' worth of housing against the proposed housing target with an additional buffer of 20% to reflect persistent under delivery of housing in the authority (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identifies a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

2.7.2 In determining whether sites are deliverable and developable in the 2013 SHLAA update, the requirements of the NPPF have been considered, including footnotes 11 and 12 to paragraph 47, as well as the draft version of the PPG which was in situ at the time. Evidence

from the 2014 Blackpool Local Plan and CIL Viability Study (EB002) and annual completion records (EB008) has helped to inform such decisions. Further detail on the SHLAA methodology and the assessment of sites is contained within the 2013 SHLAA update.

- 2.7.3 The 2013 SHLAA update found that at 31st March 2013 there was enough land to accommodate a potential supply of 5,379 (net) dwellings to 2027, comprising 3,979 dwellings from identified SHLAA sites and 1,400 dwellings from windfall sites. This scale of potential housing supply over the remaining 14 years of the plan period provides a modest level of flexibility (a 30% buffer against identified sites in the SHLAA) to reflect Blackpool's challenging issues with delivery evidenced in the 2014 Viability Study (EB002). The risks associated with delivering more challenging sites in addition to development in more viable locations are balanced with the Council's aspiration for these challenging sites to come forward, which is critical in order to deliver much needed regeneration and to rebalance the housing market in line with policy objectives and priorities. Notwithstanding these risks, the Housing Requirement Technical Paper (EB003) provides robust evidence on delivery.
- 2.7.4 As well as analysing future land supply identified in the SHLAA, the Housing Requirement Technical Paper draws on evidence of historical supply to show that challenging sites have come forward for development in Blackpool over a sustained period historically, reflecting the Borough's urban character, tightly drawn boundary and long-standing regeneration strategy. Importantly, this technical paper also considers actions being undertaken to facilitate the delivery of challenging sites over the plan period, with evidence of existing and emerging initiatives being pursued by the Council and its partners to facilitate development of sites in those areas of the Borough where achieving viable development is challenging. These initiatives are being pursued on the back of the Council's successful track record in bringing difficult sites forward, which includes working with development partners, housing associations and the Homes and Communities Agency. This illustrates the Council's commitment in helping to deliver the housing target in a very difficult market in order to deliver the key objectives underpinning the Core Strategy whilst providing a sustainable level of new homes in Blackpool.

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?

- 2.8.1 Analysis of completion records since 2003 shows that windfall developments have been a constant and significant source of housing supply in Blackpool over the last decade, largely through conversion of existing buildings particularly holiday accommodation. This supply has remained relatively unchanged in the current market. It is reasonable to assume that windfall sites will continue to be delivered over the plan period within the context of Blackpool's future regeneration priorities and plan objectives to rebalance the housing market and provide a viable level of quality holiday accommodation. In addition, the plan objective to link the delivery of new housing outside the existing urban area with regeneration priorities, for example through financial payments, will assist the Council to deliver this windfall provision through its housing intervention strategies.

- 2.8.2 A windfall allowance of 100 dpa is consistent with completion trends for conversions over a sustained period historically. It is also realistic, having regard to expected future trends which are supported by policy objectives and pro-active local housing intervention strategies. As well as residential conversions it reflects other opportunities including bringing long-term empty properties back into use in line with ongoing Council strategies, which is supported by paragraph 51 of the NPPF. It also includes new-build regeneration schemes from sites not possible to identify in the SHLAA, for example on the Promenade, supported by the policy approach to promote a new high quality residential offer to complement investment in quality holiday accommodation and support regeneration of the seafront.
- 2.8.3 In calculating the windfall allowance there is no issue of double counting, as conversions were not included as identified sites in the SHLAA and improving vacancy rates / assumptions about re-occupation of vacant stock were not factored into the housing need calculation. Conversions which have already been granted planning permission are included in the windfall allowance, although these are not accounted for elsewhere. Furthermore, it does not include an allowance for development of residential gardens which would be in conflict with the NPPF.
- 2.8.4 Therefore the Council considers there is compelling evidence to make an allowance for windfall sites in the supply calculation, in line with paragraph 48 of the NPPF. An allowance of 100 dpa over the plan period is realistic against historic windfall delivery rates and expected future trends having regard to plan objectives and local priorities which support the delivery of windfall opportunities. The delivery of windfall sites will continue to be monitored, allowing the Council to take appropriate action if delivery is not on track.
- 2.8.5 Further justification is provided in the Housing Requirement Technical Paper (EB003), 2013 SHLAA Update (EB007) and housing monitoring reports produced annually.

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

- 2.9.1 With Blackpool's distinct and complex challenges regarding its housing market and the dynamics of its local economy, a sustainable and managed delivery of housing growth over the plan period is necessary to support key local priorities around housing, economic prosperity, health and wellbeing and encouraging ambition. Managing the timing of development is also critical in order to deliver the four goals and key objectives underpinning the Core Strategy and the overarching spatial focus of the plan for regeneration and supporting growth.
- 2.9.2 The alignment of housing growth to realistic economic forecasts will meet Blackpool's identified housing need and ensure that the pace at which development comes forward will not undermine co-ordinated housing, health and skills intervention programmes to improve the quality of the existing housing stock, streets and spaces and reduce vacancy levels, alongside improving the health and wellbeing of residents and raising their ambition and aspiration to enable them to engage in the labour market. It will also enable development to

be supported by improvements to infrastructure necessary to address resort regeneration, improve the town's prosperity and make Blackpool a more attractive place to live and invest. Blackpool's circumstances are such that the expected rate of housing delivery is considered to be aspirational yet realistic having regard to its very challenging housing market and local economy evidenced in the Fylde Coast SHMA (EB004) and AMION Consulting Report (EB006); and a phased approach to housing delivery will provide flexibility to respond to these circumstances whilst ensuring housing growth is supported by the necessary social, economic and physical infrastructure.

- 2.9.3 The Council recognises the importance of identifying and maintaining a robust supply of deliverable housing sites and the contribution that new housing can make to strengthen the economy by stimulating demand. For this reason, the difference in planned level of housing between phases is fairly modest, with an increase of 30 dwellings per annum (dpa) each time. Nevertheless, given the issues described above, the Council remains of the view that a phased approach is necessary.
- 2.9.4 There is no indication in the NPPF that a phased approach to delivery is inappropriate; therefore it is important to consider whether this approach is consistent with the policy elements of the NPPF. Managing housing growth with sustainable patterns of development over the plan period is considered to support the underlying principle of sustainable development at the heart of the NPPF. It is also fully justified, soundly based and takes account of local circumstances. Furthermore, there would still be a sustainable boost of housing supply in the short, medium and long term of the plan period in line with paragraph 47 of the NPPF as follows:
- A target of 250 dpa in years 1-5 represents a significant boost compared to average completions between 2008 and 2013 (176 dpa) yet is considered realistic in light of market conditions and while economic recovery is underway;
 - A target of 280 dpa in years 6-10 represents a significant boost compared to average completions over a sustained ten year period between 2003 and 2013 (243 dpa);
 - A target of 310 dpa in years 11-15 represents a significant boost compared to average completions over a longer sustained period since 1991 (267 dpa) yet remains realistic to deliver having regard to past development trends.
- 2.9.5 With respect to the first section of paragraph 47 of the NPPF, the Council has used its evidence base to ensure that the Core Strategy meets the housing needs in full; and the phased approach has no bearing on this as the targets of 250, 280 and 310 dpa are all within the range of objectively assessed need identified in the SHMA and are supported by analysis on the local economy in the AMION Consulting Report. Furthermore, the targets are all significantly higher than the latest SNHP-2012 based prediction, which the PPG states should provide the 'starting point' for the estimate of overall housing need, which implies the need for 151 dpa in Blackpool over the period 2011 – 2030.
- 2.9.6 With respect to the remaining sections of paragraph 47 of the NPPF on supply and expected rate of delivery, the Council has illustrated a housing trajectory linked to a phased approach.

This has regard to the need to identify a range of deliverable and developable sites and an ongoing five year land supply, with a 20% buffer to reflect persistent levels of under delivery where appropriate, and will be monitored and reviewed on an annual basis. Each delivery phase provides a reliable source of land supply, whilst supporting the spatial focus of regeneration and supporting growth through the inclusion of a balanced supply of previously development land and Greenfield sites across the Borough. A Site Allocations DPD will identify sufficient sites to accommodate the housing target in the medium to longer term of the plan period where necessary.

2.9.7 The Council considers that a phased approach to enable a sustainable and managed delivery of housing growth is fully justified and soundly based in relation to Blackpool's local circumstances, is supported by robust evidence and would not be in conflict with the NPPF. Further justification is provided in the 2014 Housing Requirement Technical Paper (EB003).

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?

2.10.1 The AMION Report (EB006) contains analysis of the dwelling requirements from the employment-led scenarios by five year periods between 2012-2027 to enable comparison of economic growth forecasts by Experian and Oxford Economics. Both forecasts show job change of -2% between 2012 and 2017, with Oxford Economics then forecasting job change at 0% for the remainder of the plan period (compared to Experian at 1-2%). Accordingly, both forecasts show low levels of dwellings are required in the first five years of the plan compared to the medium to long term, which supports the principle of a phased approach.

2.10.2 The Oxford Economics dwelling requirement for 2012-2017 (72 dpa) falls well below the range of objectively assessed need for Blackpool identified in the SHMA and would therefore fail to meet Blackpool's full housing need in the short term or sustainably boost the supply of housing. As a consequence of this low target, much higher levels of housing would be required to be delivered in the medium to long term (361 - 411 dpa) which is not considered to be realistic having regard to past development trends and future delivery strategies. Therefore, it is considered that the proposed phasing approach, which supports higher levels of housing towards the end of the plan period following a period of more optimistic job growth forecasts whilst also capitalising on wider resort regeneration, improvements to infrastructure and the delivery of local strategies, is more appropriate to local circumstances and ensures that Blackpool's housing needs are met in full.

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?

2.11.1 The capacity identified in the 2013 SHLAA update (EB007) is what the Council considers could potentially be delivered during the plan period using the best information available and reflecting the plan objectives for regeneration and a rebalanced housing market whilst delivering a sustainable level of new homes. This update on supply draws on evidence from the 2014 Local Plan and CIL Viability Study (EB002), which confirms Blackpool's difficult housing market and the challenges in delivering sites on previously developed land and in the inner areas. However, notwithstanding these challenges, the Viability Study advises that the findings do not automatically mean that all sites in the locality of the modelled inner area sites are unviable; and in considering future supply, this should recognise the importance of delivering development and regeneration in these localities, in addition to development in more viable locations. This supports the methodology in the 2013 SHLAA update to not automatically exclude identified inner area sites, but to recognise the need to provide a reasonable buffer of identified sites beyond what is realistically required over the plan period to achieve Blackpool's future housing target.

2.11.2 Sites with known constraints to development which cannot be overcome are sifted out in earlier stages of the SHLAA methodology, meaning the total supply of identified sites including the 30% buffer is what the Council considers to be deliverable or developable over the plan period. Historically, a buffer of 30% has been considered reasonable in order to provide flexibility should some sites not come forward as estimated. This 30% has regard to the proportion of sites identified in previous SHLAA updates which have / have not come forward and the challenges in bringing forward some of the current sites identified in areas where achieving viable development is difficult.

2.11.3 Analysis of supply from identified sites in the 2013 SHLAA update (3979 dwellings) shows the majority of dwellings (61%) are on previously developed land and 39.5% are within the defined inner area. Excluding the Rigby Road development (410 dwellings) which is currently being delivered in accordance with a phased programme of works, this supply of inner area sites is reduced to 29%. Analysis of completion records show that challenging sites have come forward for development over a sustained period since 2003 (and 1991), reflecting the Borough's urban character, tightly drawn boundary and long-standing regeneration strategy. Since 2003, net new build completions on previously developed land have averaged 87% of total delivery each year, while the proportion of new build completions on sites within the inner areas has varied, with trends ranging from 5% - 45% each year and averaging 22% over the ten year period. This delivery has been helped by the Council successfully working in partnerships to facilitate a number of regeneration schemes. With existing and emerging local strategies outlining the ongoing commitment to help facilitate development on more challenging sites evidenced in the Housing Requirement Technical Paper (EB003), it is reasonable to assume these sites will continue to come forward over the plan period.

2.11.4 Therefore, including a buffer allowance against identified sites in the SHLAA is a balanced approach which enables more challenging sites together with sites in more viable locations to be brought forward to meet the plan objectives for regeneration and a rebalanced housing market, whilst ensuring the housing target can be delivered. This approach to delivery draws on evidence of past development trends and local strategies to facilitate future development of more challenging sites.

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

2.12.1 In response to evidence of Blackpool’s complex challenges regarding its housing market and the dynamics of its local economy, which are summarised in Chapter 2: Spatial Portrait of the Core Strategy, it is considered that sufficient and appropriate emphasis is given in the plan to the provision of “aspirational” family housing in order to rebalance the housing market and help to support a sustainable local economy. This emphasis is also a positive response to the need for Local Plans to deliver a wide choice of quality homes as required the NPPF.

2.12.2 Paragraph 4 of the Core Strategy vision makes appropriate reference to a significantly improved housing stock with a range of new, high quality homes in attractive neighbourhoods attracting new residents who aspire to live by the sea, as well as improved choice in quality homes in South Blackpool. This is supported by a number of Core Strategy objectives including 2, 5, 8, 9, 10, 16, 18 and 19. The achievement of these objectives will be through the Core Strategy policies which are to be read as a whole. As well as delivering a sustainable level of new homes to meet future needs, the housing policies in Chapters 5, 6 and 8 aim to deliver an appropriate type and tenure mix of good quality homes across the Borough, in areas where people want to live. With respect to managing the quality, design and mix of development, this is specifically addressed in Policy CS13: Housing Mix, Density and Standards, although providing “aspirational” family housing where people want to live is inherently linked with creating more sustainable communities which is why the housing policies are to be read as a whole.

2c Five Year Supply of Housing

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?

2.13.1 The 2013 SHLAA update and five year housing supply position (EB007) has been prepared in accordance with the requirements of paragraph 47 of the NPPF which requires Local Planning Authorities to: ‘identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an

additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.' It has also been prepared in accordance with paragraph 159 of the NPPF which requires Local Planning Authorities to 'prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'.

- 2.13.2 The five year housing supply identified in the 2013 SHLAA update and shown in the five year trajectory is what the Council considers is realistic to deliver to meet Blackpool's identified housing need, supporting the plan objectives and wider strategies for sustainable housing growth and a rebalanced housing market. This evidence on supply draws on the best information available (confirmed by survey work undertaken or information from developers/land owners where possible) within the context of evidence on market conditions and viability, historical trends and various local housing delivery strategies.
- 2.13.3 Blackpool's five year deliverable supply at the 1st April 2013 is 1612 net dwellings, comprising 1112 dwellings identified in the SHLAA and 500 dwellings from windfall sites. This comprises 1104 dwellings with planning permission (full or outline) and a further 245 dwellings with a current planning application being considered (including those permitted subject to a Section 106 agreement). Paragraphs 2.49 and 2.50 in the 2013 SHLAA update include justification for the inclusion of these sites, which are considered to have a realistic prospect of being built. The expected lead-in time and build-out rate for each site is considered to be realistic, having considered market conditions, historical delivery rates on comparable sites, monitoring the progress of site delivery to date and engagement with developers where possible.
- 2.13.4 It is important to note that Blackpool's five year deliverable supply includes a net loss of 297 dwellings which are being demolished to regenerate one of Blackpool's priority neighbourhoods, Queens Park. This highlights the Council's commitment to identify enough suitable sites to deliver sustainable housing growth whilst delivering a rebalanced housing market and neighbourhood regeneration.
- 2.13.5 This latest assessment on delivery in the 2013 SHLAA update has been strengthened through additional work on site suitability and availability. Previous information on existing sites was reassessed (e.g. site constraints and physical limitations) and additional information on new and existing sites was obtained from survey work, planning records, property listings, developer / landowner engagement and the local authority's disposal programme. The assessment has also been strengthened with regards to achievability, through additional work which considers Blackpool's difficult housing market and the challenges in delivering sites in the inner areas, taking account of the economic viability of sites as well as actions by

the Council and its partners to facilitate housing delivery within the next five years and beyond.

2.13.6 The inclusion of sites in areas where achieving viable development is more challenging within the deliverable supply has regard to:

- the 2014 Blackpool Local Plan and CIL Viability Study (EB002) which advises that not all sites in the locality of the modelled inner area sites are automatically unviable;
- the Council's latest housing monitoring report (EB008) which show comparable developments / sites have come forward historically, including during the current economic climate;
- Ongoing actions and strategies being undertaken by the Council and its partners to facilitate delivery in these difficult areas and in a very challenging market. This includes comprehensive redevelopment programmes at Rigby Road and Queens Park; bringing a number of long term empty properties back into use; and neighbourhood improvement programmes (the 2014 Housing Requirement Technical Paper (EB003) provides further detail). As well as directly contributing towards Blackpool's deliverable supply, these delivery strategies will act as a regenerative catalyst to make the town a more attractive place to live and invest, thus facilitating housing delivery by the private sector in the short, medium and long term of the plan period.

2.13.7 In some instances the assessment of forecast delivery through the 2013 SHLAA Update led to a site being removed from the deliverable supply or a revised site capacity figure being identified to facilitate a wider housing mix. As it is the current market which is primarily holding back delivery rather than a lack of suitable, available sites, if the overall housing market does improve, then it is possible that some developments identified in years 6-10 (or beyond) could be delivered sooner than has been assumed. This will continue to be monitored in future SHLAA updates to ensure sites are recorded in the correct trajectory period.

2.13.8 In accordance with the requirements of the NPPF, the five year land supply calculation includes a 20% buffer of sites (moved forward from later in the plan period) to reflect Blackpool's persistent under-delivery against previous plan requirements in the (now revoked) North West RSS and also takes into account the shortfall accrued to date during the plan period.

2.13.9 Further information on the assessment of deliverable housing land and the five year supply calculation is contained within the 2013 SHLAA update and 2014 Housing Requirement Technical Paper.

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

2.14.1 Yes, as the assessed housing capacity for all sites identified in the 2013 SHLAA update (including deliverable and developable sites) is a net figure. This net figure reflects likely demolitions of the existing housing stock required to facilitate development, either through regeneration programmes or to enable site access.

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?

2.15.1 Blackpool's circumstances are such that the expected rate of housing delivery is considered to be aspirational yet realistic, having regard to its distinct and challenging housing market, the dynamics of its local economy and the challenges in achieving viable development particularly in current market conditions and while economic recovery is under way. The Council is doing everything it can to facilitate housing delivery in this difficult economic climate and local market by identifying a sufficient supply of deliverable sites (including a 20% buffer of sites moved forward from later in the plan period to ensure a realistic prospect of sites coming forward) and by facilitating a number of regeneration and neighbourhood improvement programmes to make the town a more attractive place to live and invest. It considers that the approach currently proposed creates the best opportunity to deliver sustainable housing growth in the next five years whilst providing a platform for housing delivery in the medium to long term to be supported by necessary improvements to the town's social, economic and physical infrastructure and once the market and economy becomes stronger.

2.15.2 The Council recognises the importance of identifying and maintaining a robust supply of deliverable housing land to provide a realistic prospect of new housing coming forward to deliver sustainable growth as well as other Core Strategy objectives. For this reason, it has included a 20% buffer of sites and a proportion of the shortfall from 2012/13 in its five year land supply calculation. However, in light of the distinct local circumstances identified above and in other Matter 2 responses, to include the entire undersupply from 2012/13 in the five year housing target is not considered realistic to deliver. It is also not considered necessary as the five year target currently proposed is of a sufficient scale to meet Blackpool's identified housing need and provide a sustainable boost of housing in the short term (in comparison to average completions between 2008 and 2013) in line with the requirements of the NPPF, including paragraph 47.

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?

2.16.1 The Council considers that a phased approach is fully justified and soundly based in relation to Blackpool's local circumstances, is supported by robust evidence and would not be in conflict with the NPPF. It also considers that it has provided robust evidence to demonstrate a five year supply of deliverable housing land and that the Council is doing everything it can to facilitate delivery in a very difficult market. These issues are dealt with separately in other Matter 2 responses (2.9 and 2.13 in particular). Further justification is provided in the 2014 Housing Requirement Technical Paper (EB003).

2.16.2 The Council's most up-to-date housing land supply position remains the 2013 SHLAA update (EB007), although it continues to monitor supply through the annual housing monitoring work. The latest work suggests a further 21 dwellings (net) have been granted planning permission up to December 2014 which can be included in the deliverable supply. These consist of:

- 12 dwellings on land at 11 Dover Road (site identified in the 2013 SHLAA update as part of the developable supply);
- 8 dwellings on land at 29-35 Ripon Road;
- 1 dwelling on land adjacent 2 Kintyre Close.

2.16.3 Whilst the Council believes it has provided robust evidence and justification on its housing delivery strategy, if it is required to identify additional supply in the next five years then given the modest level of new planning permissions identified above, the 2013 SHLAA update would need to be revisited and updated. However, as the evidence demonstrates it is the current market which is primarily holding back delivery rather than a lack of suitable, available sites, the Council considers it unlikely that the identification of additional sites will boost the supply of housing in the early years of the plan beyond the levels currently proposed.

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

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?

2.17.1 Affordable housing is an important issue in Blackpool. Meeting residents' need for affordable housing to provide people with a choice of homes they can afford in places they want to live is a key objective of the Core Strategy (page 23 of SD001).

2.17.2 The Council considers the affordable housing requirements of policy CS14 to be realistic, deliverable and supported by up to date evidence.

2.17.3 Policy CS14: Affordable Housing sets out the Council's policy approach to affordable housing. It is a priority for the Council, through its planning policies and wider housing strategy to ensure there is an adequate supply of good quality affordable homes across the Borough.

2.17.4 Policy CS14 has been informed by a robust and up-to-date evidence base including:

- Fylde Coast Strategic Housing Market Assessment (SHMAA)(December 2013, Published February 2014)(EB004) and Addendum 1 (November 2014)(EB005)
- Blackpool Local Plan and Community Infrastructure Levy Viability Study Report 2014 (EB002)

2.17.5 A summary of the evidence base informing Policy CS14 is set out in Section 4 of the Housing Requirement Technical Paper (EB003) – paragraphs 4.2 to 4.8.

2.17.6 The SHMA includes a Housing Needs Assessment that estimates future requirements for affordable housing for the Borough and calculates the likely level of affordable housing required over the next 5 years. This SHMAA Addendum 1 identifies this as 272 new homes per year in Blackpool (A minor amendment is proposed to amend this figure which was 264 in the 2013 SHMA). Meeting this need in full would require overall levels of housing delivery far in excess of what has been achieved over the last ten years and so it cannot be reasonably expected to be realised. However, in acknowledging this, the SHMA supports the need for planning policies to enable sufficient affordable housing delivery to avoid exacerbating affordability issues. This includes the need for new residential developments to make an appropriate contribution towards affordable housing provision, where this would not otherwise render them unviable. It is also important to note that the private rented sector, subsidised through housing benefit, as well as alternative means of delivery outside the planning system (such as grant funded schemes to improve social housing), will continue to play an important role in meeting Blackpool's affordable housing need.

- 2.17.7 In response to the requirements in NPPF paragraph 173-174, a Local Plan and Community Infrastructure Levy Viability Study Report was produced to support the Core Strategy. Evidence from the viability testing showed that the policy requirements of CS14 rendered development within the inner areas unviable. In response to this, Policy CS14 was amended to remove the requirement to provide affordable housing within the Inner Areas to ensure a realistic approach. Elsewhere across the borough, the Viability Report considered that development was viable with the policy requirements of CS14. An element of flexibility has however been built into the policy CS14 2(c) which states that where the affordable housing requirements cannot be met in full as they would render the development unviable, an alternative level of provision may be negotiated subject to this being robustly justified through the submission of a viability statement.
- 2.17.8 It is important to continue building new affordable housing because of the level of need for affordable accommodation in Blackpool and particularly the need for homes that are matched to the needs of different types of households, high quality, well managed, and available for as long as tenants want them. The Council plays a pro-active role, using its financial capacity within the Housing Revenue Account to deliver affordable housing. It proposes to build up to 100 new Council homes over the next 3 years in addition to the 78 new homes in Queens Park Phase 2, alongside investment in the existing stock.
- 2.17.9 Housing associations will continue to play an important role in building new affordable homes, and the Council will assist by helping to identify sites, having a clear strategic framework.
- 2.17.10 The Council will also work with partners to keep under review how social housing is allocated to make it as easy and as fair as possible for residents wanting to find a home, as well as supporting balanced communities in each area.

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

- 2.18.1 Policy CS14 in its current form does not accord with statements in DCLG's Planning Practice Guidance concerning the threshold for requiring affordable housing. Part 2(b) of policy CS14 requires developments on sites less than 0.5ha that would comprise 3-14 dwellings to make a financial contribution towards off-site provision of affordable housing. However the update to Planning Practice Guidance (paragraph 12) states that contributions for affordable housing should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm.
- 2.18.2 The update to National Guidance was introduced on 28th November 2014. It was too late to make any further changes to the Schedule of Proposed Minor Modifications (SD003) as this document had already received approval through an Officer Executive Decision on 17th

November 2014. The Council is willing to accept modifications to this policy in order for it to accord with the Planning Practice Guidance.

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

2.19.1 The Fylde Coast SHMA (EB004) assesses the housing need of the whole community, including older persons and those with special needs, which is considered in Section 4 of the Housing Requirement Technical Paper (EB003). Core Strategy Policy CS13: Housing Mix, Density and Standards requires the design of all dwellings (including conversions) to meet the Council's housing standards, to be based on relevant national standards/guidance where appropriate, including Lifetime Homes standards. Through these standards the Council can ensure the provision of accessible homes that are adaptable for lifestyle changes, to meet the future housing needs of Blackpool's older person households as well as those with special needs. This flexible approach ensures that changing needs can be taken into account. Current guidance on the creation of new dwellings in Blackpool from conversion or subdivision (AD002) encourages provision of accessible and adoptable homes, with the intention to produce a similar document for new build development once the Government's position on the emerging local housing standards is known.

2.19.2 In addition, in recognition that specialist accommodation is also necessary to address this need, it is proposed to retain existing saved Policy BH24: Residential Institutions and Community Care Residential Uses until the Site Allocations and Development Management DPD is produced. This saved policy supports the provision of specialist accommodation in suitable locations and will be reviewed as required when preparing the DPD to ensure that the approach appropriately responds to the most up-to-date assessment of need. Through this approach the Council will consider whether or not it is appropriate to allocate specific sites for certain types of specialist accommodation, although acknowledging this will be difficult to plan for as its delivery will be dependent on funding and delivery partners.

2.19.3 The Housing Requirement Technical Paper also considers the reliance by older people on the social and private rented sector in Blackpool and how ongoing housing intervention programmes to improve the quality and mix of this housing stock will help to meet future need.

2.19.4 With a flexible and diverse approach required to meet this need through various Council policies and strategies, it is difficult for the Core Strategy to provide a more detailed policy framework that would require a certain level of specialised housing to be delivered. The Council considers that the plan provides adequate provision to deliver the housing needs of these different groups in the community which appropriately responds to the SHMA evidence in order to help create sustainable, inclusive and mixed communities as required by paragraph 50 of the NPPF in particular.

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

- 2.20.1 The Council considers that the criteria based policy in the Core Strategy – Policy CS16 together with the proposed minor modification MM023; the updated Fylde Coast Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (September 2014); the call for sites currently being undertaken by the Council; and the firm intention to include the assessed need and site allocations in Part 2 of the Local Plan provides a positive proactive and sound approach to meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople (Travellers).
- 2.20.2 The Local Plan - Part 1 – Core Strategy - Policy 16 sets out criteria to assess additional traveller sites, which come forward as part of a Site Allocations document where there is an identified need or through individual planning applications to ensure such development is sustainable socially, economically and environmentally. To ensure the accommodation needs of Travellers across the Fylde Coast sub-region are met, Blackpool Council along with Fylde and Wyre Councils jointly commissioned consultants Opinion Research Services to undertake an accommodation assessment to update the 2007 Lancashire Sub-Regional Gypsy and Traveller Accommodation and Related Services Assessment.
- 2.20.3 The Fylde Coast Authorities considered that the update was necessary in response to Government guidance set out in NPPF and Planning Policy Guidance for Traveller Sites (CLG 2012) and to ensure that each authority's local plan was based on sound and robust evidence with respect to Travellers accommodation needs. Government guidance requires local planning authorities to make adequate provision for Traveller sites by working collaboratively with neighbouring authorities to develop fair and effective strategies to provide sites to meet objectively assessed needs. The Council's collaborative working is referenced in the Fylde Coast Authorities and Lancashire County Council Duty to Cooperate Memorandum of Understanding (MOU) (DC002).
- 2.20.4 The updated Traveller Assessment was jointly commissioned in 2013 with the final report received in September 2014. By the time the assessment was completed, the Core Strategy had advanced to the Pre Submission stage. As set out in our response to Question 1.3 the Council considered that it was important to progress as soon as possible the strategic policy framework for the Borough, to provide a clear direction and increased certainty for developers, investors and the community with regard to future investment and development avoiding further delay, which could potentially undermine key regeneration and development projects.
- 2.20.5 The commitment of the Council to providing for the accommodation needs of Travellers is clearly evident through the inclusion of Policy CS16, undertaking an updated joint Fylde Coast assessment and the subsequent Call for Sites. The suitability of the submitted sites will be assessed and those deemed suitable will be subject to the required consultation as

part of the preparation of the Local Plan Part 2: Site Allocations and Development Management Policies. The programme for progression of the Local Plan Part 2 is set out in the Council's Local Development Scheme (SD014). The Council has not received any substantive objection to the approach being adopted on the provision of traveller accommodation needs (SD006).

a) In the light of the Sept 2014 Fylde Coast Gypsy and Traveller and Travelling Showpeople Accommodation Assessment Final Report is it appropriate to set the target for sites to meet their needs in the Site Allocations and Development Management Policies Local Plan Document rather than in the Core Strategy?

2.20.6 As set out in the NPPF (paragraph 153) and the online resource Planning Practice Guidance (PPG), Government's preferred approach for planning authorities is to prepare a single Local Plan for its area (or a joint document for neighbouring areas). PPG clarifies that while additional Local Plans can be produced, for example a separate Site Allocations or Area Action Plan, there should be clear justification in doing so.

2.20.7 As referred to in the Council's response to Question 2.20 above and in Matter 1 Question 1.3, the Council is concerned in progressing the Core Strategy to ensure a strategic policy framework is in place as soon as possible which reflects the priorities of the Council, community and other stakeholders who have an interest in the future development of Blackpool. Due to the timing of the updated GTAA 2014, along with the advanced stage of the Core Strategy, the Council was concerned that setting the target for sites in the Core Strategy would mean that an additional round of consultation would need to be undertaken which would further delay the submission of the Core Strategy.

2.20.8 As Part 2 of the Plan will commence in 2015 (Local Development Scheme SD014) and be subject to the same preparation and scrutiny as the Core Strategy and as there is a criteria based policy contained in the Core Strategy against which Traveller sites can be assessed should any site come forward prior to sites being set out in the Part 2 of the Local Plan, the Council considers that the approach being adopted is reasonable in that it allows the progression of the Core Strategy whilst at the same time showing a positive commitment by the Council to addressing the accommodation needs of Travellers. There are other examples where the target for Traveller accommodation needs is set out in a DPD other than the Core Strategy for example in the London Borough of Hillingdon, South Ribble and Chorley Borough Councils. Of note is the fact that the Council has not received any objections from consultees regarding the approach it is adopting on this matter (SD010 page 48).

b) Is there evidence that there is sufficient land to provide for the plan period extra pitch requirements in Blackpool as identified in the Sept 2014 Report?

2.20.9 The Council is currently undertaking a Call for Sites for Traveller accommodation. Any submitted sites will be assessed for their suitability and will be consulted upon through the preparation of the Site Allocations and Development Management Policies DPD. At this time the Council is unable to state whether there is sufficient land available to accommodate the future need pending the outcome of the Call for Sites assessment. It is worth noting however that within the 2013 SHLAA (EB007) there is a 30% buffer of housing sites which potentially could assist in meeting the extra pitch requirement subject to these sites being assessed as suitable for such use. However, if there is a shortfall of sites within the Borough, through the Duty to Cooperate the Council will approach Fylde and Wyre Councils to request if they are able to provide for Blackpool's shortfall. All three Councils are currently co-operating on the provision of Traveller accommodation across the Fylde Coast and all three authorities have recently co-ordinated the timing of their Call for Sites for such uses, to be able to work more closely and coordinate each authorities findings.

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?

2.21.1 The Housing Standards Review: Technical Consultation took place in autumn 2014 with the outcome yet to be published. The consultation highlighted that a 'statement of policy' should be issued by the Government in early 2015 (at the time of writing this has not been issued) which will set out how these standards should be applied in Local Plans and in considering planning applications. It will also set out new national planning policy that should be considered when applying specific paragraphs of the National Planning Policy Framework.

Energy Requirements

2.21.2 In respect of energy requirements, from the date of the policy statement, local planning authorities will still be able to set planning policies requiring energy reductions above the Building Regulations until the zero carbon policy comes into effect. The legislation (Planning and Energy Act 2008) that provides Local Authorities in England with the ability to set these policies is to be amended in late 2016 (subject to parliamentary approval).

2.21.3 After this point, the Government has confirmed that the energy efficiency requirements of Building Regulations will be set at a level equivalent to Code Level 4 (25% above Part L 2010). Until this amendment in 2016, the Government expects local planning authorities to take note of the direction of policy with encouragement not to exceed Code Level 4 energy requirements.

- 2.21.4 Core Strategy Policy CS10 (2): Sustainable Design and Renewable and Low Carbon Energy requires development to meet residual energy requirements, where feasible and viable, through the use of renewable and low carbon generating technologies. It was amended to reflect the recommendations of the Local Plan Viability Report with part 2 now providing a flexible approach to residual energy requirements 'where feasible or viable'.
- 2.21.5 As discussed above, it is accepted that Councils are able to set policies in their Local Plans requiring energy reductions above the Building Regulations until the zero carbon policy comes into effect in late 2016.
- 2.21.6 However, if the Inspector is minded to make a modification to remove CS10(2) due to it becoming out of date relatively early in the plan period, the Council will support this.

Internal Space Standards

- 2.21.7 With respect to internal space standards, the Government proposes that a national standard is to be applied to all new housing developments on publication of the 'statement of policy' (discussed above).
- 2.21.8 Policy CS13 (1c) highlights the need for new residential development to provide quality living accommodation which meet the standards in place for conversions or new build development. It is flexible as it does not make specific reference within the policy to the precise standards that – these could be local or national dependant of which is applicable.
- 2.21.9 Paragraphs 6.24 and 6.25 provide further explanation of this part of the policy. Reference is made to the New Homes From Old Places SPD which is instrumental in improving all aspects of residential accommodation, enhancing the residential offer across Blackpool, improving living standards, promoting sustainable communities and creating homes and neighbourhoods where people want to live. This SPD's approach helps create high quality and higher value homes that will make a major contribution to the regeneration of Blackpool's inner area and resort neighbourhoods.
- 2.21.10 Due to the unknown date for the publication of the statement of policy and the forthcoming General Election, there is uncertainty as to when the new housing standards will be implemented. Depending on the outcome of the Housing Standards Review and the contents of the statement of policy, the Council will, if required, undertake work to adopt any new national space standard. This will ultimately lead to amendments to be made to the New Homes From Old Places SPD to ensure it aligns with up-to-date Government Policy.

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

- 2.22.1 Policy CS13 has been prepared in accordance with paragraph 50 of the NPPF. This requires local planning authorities “to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities”. It also supports one of the fundamental plan objectives to deliver a choice of quality homes in Blackpool, in particular objective 9 to “...require a mix of house types, sizes and tenures suitable to the location to rebalance the housing market”.
- 2.22.2 The mix of housing identified in Policy CS13 is based on current and future demographic trends, market trends and the needs of different community groups evidenced by the Fylde Coast SHMA (EB004). This local evidence together with the plan objectives to rebalance the housing market and create sustainable communities, provides a sound basis for justifying the size, type and range of housing required in particular locations of the Borough, reflecting local demand now and in the future. Having considered the proposed housing mix requirement in the 2014 Blackpool Local Plan and CIL Viability Study (EB002), the study findings conclude they are not believed to be anything other than a developer would design when bringing forward a high quality scheme and therefore there are no additional cost implications to a development.
- 2.22.3 Part 1 of Policy CS13 requires “a mix of house types and sizes, having regard to the specific character and location of the site”. It goes on to state “the general requirement is as follows...” This wording is considered to provide sufficient flexibility and requires developers to take account of the latest evidence on housing need together with the plan objectives, as they prepare and submit their planning applications. As with all policies, it does not rule out instances where material considerations mean there may be justification to deviate from the requirement providing this is supported by robust evidence, as can sometimes happen in decision making and is referenced in paragraph 14 of the NPPF.

2e Other Housing Matters

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?

- 2.23.1 Paragraph 156 of National Planning Practice Guidance states that Local Planning Authorities should set out the strategic priorities for their area within their Local Plan. The purpose of Policy CS1: Strategic Location of Development is to give clear direction on the strategic location of development. It identifies the focus for regeneration and supporting growth through regeneration of the Town Centre, Resort Core and Inner Area Neighbourhoods alongside supporting economic and housing growth at South Blackpool.

2.23.2 Development in areas outside of those identified in policy CS1 will be considered against other relevant Core Strategy policies and Development Management policies. The Core Strategy contains a number of overarching thematic policies that guide development across the Borough. One such example is policy CS4: Retail and Other Town Centre Uses which sets out the approach to this type of development in the defined Local, District and Town Centres but also guides retail development in places outside of these identified centres.

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

2.24.1 The Council considers that policy CS12 adequately addresses the heritage value of inner area neighbourhoods.

2.24.2 Objective 5 of the Core Strategy (Page 23 of SD001) is to create well-designed places for people to enjoy with high quality buildings, streets and spaces, whilst conserving and enhancing Blackpool's rich heritage and natural environment.

2.24.3 This objective is delivered through a number of policies including Policy CS12: Sustainable Neighbourhoods which ensures that future development and investment contributes to delivering sustainable communities, whilst focusing regeneration and improvement in a number of identified priority neighbourhoods. The improvement of these neighbourhoods is fundamental to creating more sustainable communities. In term of heritage value, the Council will support development and investment which reflects the built heritage of the neighbourhoods and enhances the setting of important existing buildings.

2.24.4 It should also be noted that Policy CS12: Sustainable Neighbourhoods is read in conjunction with Policy CS8: Heritage which sets out the overarching heritage policy for the borough.

2.24.5 The heritage value of Blackpool's Inner Area neighbourhoods is recognised within the various Heritage Characterisation Studies (EB021) which form part of the Core Strategy Evidence Base. These studies identify buildings which have a positive heritage character and recommend that a number of buildings that should be 'locally listed' in recognition of their heritage value and contribution to the streetscene. In response to this, the Council's Built Heritage Team has undertaken a project to 'locally list' 293 properties across the Borough, including many within the Inner Area to safeguard their heritage value. Details of these can be found at <https://www.blackpool.gov.uk/Residents/Libraries-arts-and-heritage/Blackpool-heritage/Conservation-areas-and-listed-buildings/Locally-listed-buildings.aspx>