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Blackpool Council
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Dear Sir / Madam,

BLACKPOOL LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES – PUBLICATION CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies - Publication Version (Proposed Submission) Regulation 19 (January 2021) consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Policy HSA1: Housing Site Allocations

Policy HSA 1 is not considered to be sound as it is not positively prepared for the following reasons:

3. Policy CS2 of the adopted Core Strategy, sets out Blackpool's housing requirement to build 4,200 new homes between 2012 and 2027, equating to 280 dwelling per annum (dpa), although the requirement was phased over the plan period. Policy HSA1 identifies the sites that are to be allocated for residential development, it allocates sites for 1,419 dwellings. Table 1 within the justification text also provides a summary of the housing supply at 2019, giving a total supply of 4,544 dwellings. Table 1 suggests that 729 of these dwellings allocated in Policy HSA1 had extant permission at 30th September 2019, leaving a 690 dwellings.
4. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The Plan should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Council's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (5YHLS), and achieve Housing Delivery Test (HDT) performance measurements.



5. The HBF does not consider that the Council has given sufficient consideration to the possibility that some sites may not come forward due to unforeseen circumstances and that this may apply to all types of sites. The HBF strongly recommends that the plan allocates more sites than required to meet the housing requirement to allow for flexibility. This should be sufficient to deal with any under-delivery which is likely to occur from some sites and would create flexibility, such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
6. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.
7. The Deliverable Five Year Housing Land Supply Statement (1st April 2019 to 31st March 2024) identifies a five-year housing requirement of 1,846 dwellings, and a supply of 2,004 dwellings, Appendix 1 provides information in relation to the deliverability of the sites. The NPPF identifies when a site can be considered deliverable this includes sites which do not involve major development and have planning permission, and all sites with detailed planning permission, unless there is clear evidence that homes will not be delivered. The PPG sets out what evidence may be used to demonstrate deliverability this includes:
 - Current planning status – e.g. how much progress has been made towards approving a reserved matters and discharge of conditions;
 - Firm progress being made towards the submission of an application;
 - Firm progress with site assessment work; or
 - Relevant information about site viability, ownership or infrastructure provision.
 - For sites to be considered developable the PPG also sets out the evidence that may be used to demonstrate that there is a reasonable prospect of development these include:
 - Written commitment or agreement that funding is likely to come forward;
 - Written evidence of the developer's delivery intentions and anticipated build out rates;
 - Likely build out rates based on sites with similar characteristics; and
 - Current planning status.
8. Table 1 also includes a windfall allowance for 800 dwellings over the period 1st April 2019 to 31st March 2027, equating to 100dpa. The Housing Topic Paper (January 2021) identifies 1,054 dwellings were completed on windfall sites between 2021/13 and 2018/19, this is an average of 151 dwellings each year. The Council expect windfalls from the change of use of hotels and guest houses to residential to continue, and therefore consider the 100dpa windfall allowance identified in the Core Strategy to continue as part of this Part 2 Plan.

Policy DM1: Design Requirements for New Build Housing Developments

Policy DM1 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

9. This policy states that as a minimum 20% of all new build dwellings must meet the nationally described space standard (NDSS). The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
10. PPG identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
 - **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.
11. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
12. Part 6 of the policy also looks for sites of 10 or more dwellings to provide at least 10% of dwellings at M4(2) or M4(3) standards. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
13. PPG¹ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Blackpool which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

¹ PPG ID: 56-007-20150327

14. The HBF are also concerned that the Local Plan Viability Assessment (July 2020) identifies viability issues within the borough, and that this policy requirement will further impact on these issues and may lead to the non-delivery of homes. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
15. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.
16. *The HBF considers that the policy should be modified as follows in order to make the document sound:*
 - Part 1 of the policy should be deleted.
 - Part 6 of the policy should be deleted.If these elements of the policy are retained, the Council should ensure that it has the appropriate evidence to support their inclusion and that all the elements of the policy required by the PPG and NPPF are included.

Policy DM35: Biodiversity

Policy DM35 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

17. This policy states that development proposals will be required to minimise the impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist. The Council will know that the Government is already looking at the most appropriate approach to biodiversity net gain. The HBF considers that the Council should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. This gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.
18. The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill. The Government proposes to work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, in order to provide clear and timely guidance on understanding what will be required and when.
19. The Government will issue guidance to Councils on the importance of proportionality in their application of planning policy. So that sites without reasonable opportunities to

achieve net gain through on-site habitat delivery will not face risks of delay through rigid or prescriptive requirements.

20. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery.
21. The HBF are concerned that the Local Plan Viability Assessment (July 2020) identifies viability issues within the borough, and that this policy requirement will further impact on these issues and may lead to the non-delivery of homes. It is notes that the Urban Inner Core that development is unviable and that for the urban edge development is unviable where a policy² compliant 30% affordable homes is provided.
22. *The HBF considers that the policy should be modified as follows in order to make the document sound:*
 - *Development proposals will be required to minimise the impact on biodiversity ~~and provide net biodiversity gains~~ through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist.*

Policy DM41: Transport Requirements for New Development

Policy DM41 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

23. This policy requires development to provide parking in accordance with the standards set out in Appendix D1, including the provision of electric vehicle (EV) charging infrastructure. Appendix D1 states that for each house appropriate vehicle charging infrastructure within a garage or on the driveway, for all other development at least 10% of parking bays marked out for use by electric vehicles together with charging infrastructure and cabling. It also goes on to state that to future proof, the provision should be supplemented by the installation of groundwork/passive wiring as part of the development in order to enable further installation to match demand.
24. The HBF supports the use of electric and hybrid vehicles and the introduction of the necessary supporting infrastructure via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. It is the industry's preference for a national approach to the provision of charging points rather than local authorities setting their own standards.
25. The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically feasible. The same consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of Electric Vehicle Charging Points (EVCP) in new buildings

² Core Strategy Policy CS14.

will impact on the electricity demand from these buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.

26. Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In instances where the additional costs are likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.
27. As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.
28. *The HBF considers that the policy should be modified as follows in order to make the document sound:*
 - *Proposals must ensure that: car, cycle and motorcycle parking is provided in accordance with the parking standards set out in Appendix D1; ~~including the provision of electric vehicle (EV) charging infrastructure~~; and the layout provides for sufficient levels of servicing and operational space where required;*
 - That the requirement for EV Charging Points as set out in Appendix D should be deleted.

Future Engagement

29. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
30. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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