

Planning Policy
Blackpool Council
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14/02/2019

Dear Sir / Madam,

BLACKPOOL LOCAL PLAN PART 2: PROPOSED SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES

Thank you for consulting with the Home Builders Federation on the Blackpool Local Plan Proposed Site Allocations and Development Management Policies.

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.

We would like to submit the following comments on the Part 2 Proposed Site Allocations and Development Management Policies consultation document. These responses are provided in order to assist Blackpool Council in the preparation of the emerging local plan. The HBF is keen to ensure that Blackpool Council produces a sound local plan which provides for the housing needs of the area.

Site Allocations

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.

Policy DM1: Housing Development in Residential Gardens, Infill and Backland Sites

This policy sets criteria for the development of residential gardens or infill and backland sites. The HBF have concerns over the particularly restrictive nature of this policy. The HBF recommend that the Council consider a more flexible approach for the policy, considering the benefits of developing well located, sustainable sites which could contribute to the delivery of homes.

Policy DM2: Housing for Older People

This policy states that on new build sites of 10 dwellings or more at least 20% of dwellings should be accessible and adaptable in accordance with M4(2) or M4(3).

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.

PPG (ID 56-07) 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. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

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; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Part 2 of this Policy and Policy DM3 relate to accommodation for older people, the HBF would recommend that the Council give further consideration to the wide spectrum of housing and care provision available for older people and consider how these policies may apply. The Council will be aware that Extra Care developments may fall within class C2 or C3 dependent on the level of care that they provide, therefore it is considered it may be appropriate to assess each older person accommodation scheme on its own specific characteristics.

Policy DM5: Design Requirements for New Build Housing Developments **NDSS**

This policy states that as a minimum, all new 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.

PPG (ID 56-020) 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'.*

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Electric Vehicle Charging

This policy also requires provision to be made for charging points for electric vehicles in accordance with DM Policy 39. The HBF have provided comments in relation to Policy DM 39 below.

CO₂ Reductions

This policy requires major new build residential development schemes outside of the defined inner area will be required to reduce CO₂ emissions further by at least 20% via the use of renewable and / or low carbon energy generation sources providing this is practical and viable.

The HBF is generally supportive of the use of low carbon and renewable energy, however, it is queried whether this policy is in line with the Governments intentions as set out in Fixing the Foundations, the Housing Standards Review and the PPG, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.

The Government has sought to set standards for energy efficiency through the national Building Regulations and to maintain this for the time being at the level of Part L 2013. The WMS published on 25 March 2015 sought to clarify the regulatory regime. At that time the Government decided to improve energy efficiency for residential buildings through Part L of the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. The HBF consider that Policy DM5 should allow developers flexibility to select the

most appropriate way to achieve the general aims of this policy. For example, it is possible that the general aims of the policy can be achieved by a fabric first approach using the integration of passive design, fabric specification and thermal efficiency measures to reduce energy usage without resorting to renewable energy generation.

Policy DM39: Transport requirements for new development

This policy requires proposals to provide electric vehicle charging points, Appendix C1 sets this at one charging point per house within a garage or on the driveway, with other development including flats at 10% of parking bays.

Whilst the HBF do not oppose the provision of electric charging points, the policy as worded is currently considered to be overly onerous. An element of flexibility would be beneficial and is considered to be compliant with the NPPF, paragraph 105.

The HBF would also encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that can cope with the potential for a mix of electrical heating systems and electric vehicle systems.

The HBF would also encourage the Council to consider the viability of the provision of electric vehicle charging points particularly if higher standards of charging points are required. This will also apply to policy DM5.

Future Engagement

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.

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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