

Local Plan Consultations
Growth Team
Blackburn with Darwen Borough Council
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SENT BY EMAIL
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Dear Sir / Madam,

BLACKBURN WITH DARWEN LOCAL PLAN REVIEW: ISSUES AND OPTIONS CONSULTATION

Thank you for consulting with the Home Builders Federation on the Blackburn with Darwen Council Revised Draft Local Plan Review Issues and Options consultation.

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.

The HBF is keen to work with the Council in order to achieve an adopted local plan which enables an increase in the rate of house building across Blackburn with Darwen.

Vision and Objectives

The HBF support the Council is considering whether the vision and strategic objectives remain relevant to planning for growth in Blackburn with Darwen up to 2036. The HBF would support a vision that is more focussed on the key aspects that the plan will seek to deliver but that also continues to recognise the important role that housing plays in supporting a skilled workforce, regeneration and creating a high quality environment.

The HBF considers that the Council may also want to reconsider the Strategic Objectives to ensure these also reflect the key aspects that the plan will deliver, for example the HBF would consider that one important objective of the plan should be to ensure that there is an appropriate provision of homes to meet local needs.

Growth Options

The HBF would support the Council in utilising a housing figure over and above the standard methodology. The HBF would also support the Council in uplifting the baseline figure to take into consideration the economic growth forecasts and the household formation rates. The HBF agree that the supply of additional homes derived by the higher housing numbers will help to provide opportunities for home ownership for those in their mid-twenties to mid-forties; whilst also meeting the economic aspirations of the Borough in terms of job growth.

Spatial Options

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.

Previously Developed Land

The HBF consider that the efficient use of land including the re-use of previously developed land can perform an important role as part of a balanced portfolio of housing sites. Therefore, whilst support for brownfield development is considered appropriate the HBF does not consider that it is appropriate to retain a specific target for brownfield development. The Council should seek to build upon mechanisms such as the Brownfield Register to encourage the re-use of previously developed land alongside greenfield opportunities.

Safeguarded Land

Whilst there is no definitive guidance indicating the amount of land which should be safeguarded, the NPPF (2019) is clear that where necessary Local Plans should *'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'*, and that local authorities should *'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'*. Given that the proposed plan will have at least a 15-year time horizon it is considered that the safeguarded land requirement should seek to match this. This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. The HBF would also anticipate the plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review.

Thematic Issues: Housing

Housing Mix

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Affordable Housing

The HBF consider that whilst there may be a need for a higher affordable housing figure than that set by the Government in the NPPF, the Council will need to support this evidence of both the need and the viability of the requirements.

Technical Standards

The HBF consider that there may be appropriate circumstances for introducing the optional standards, but these can only be introduced on a 'need to have' rather than 'nice to have' basis. The Council will need to ensure that they have the evidence set out in the PPG in order to introduce any of the standards in relation to the NDSS, water efficiency or accessible and adaptable homes.

Parking Standards

The HBF are generally supportive of the provision of electric vehicle charging points. However, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

Future Engagement

I trust that the Council will find these comments useful. 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 the progress of the document. Please use the contact details provided below for future correspondence.

Yours sincerely,



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