

Clare Johnson
Development Control
Blackpool Council
PO Box 17
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Our Ref: 2009

Date: 13 November 2020

Dear Clare

REF. 20/0021 - LAND SOUTH EAST OF MARPLES DRIVE, BLACKPOOL

As previously discussed, we had intended to respond verbally to the issues which required further clarification following on from the last committee Meeting. However, as requested, given the recent written representation received to the application, we will now respond in writing to both the representation and matters raised by Members.

Viability Constraints

During the last meeting, Members expressed concerns regarding the level of on-site open space and an absence of affordable housing. These shortfalls are purely as a result of the site specific viability constraints.

As Members are aware, the subject site comprises previously developed land. Whilst the former NS&I complex has been demolished, sub-surface structures remain and the subject site requires significant remediation, below-ground and earth moving works in order to bring the site's ground conditions to a developable standard. The development also requires the removal of an existing access road and associated sub-surface infrastructure. All of these factors affect the viability of the site and any other developer would be subject to the same constraints.

Furthermore, due to presence of existing trees, hedgerows, sewer easements and topographical constraints, over 27% of the site is undevelopable, further affecting the viability and in turn, dictating the areas of the site where both housing and green infrastructure can be located.

Both National and Local Planning Policy & Guidance acknowledges that there will be circumstances where developments cannot meet usual policy requirements in full, however, where this is the case it would need to be robustly justified with the submission of a viability appraisal.

In this regard, a detailed viability appraisal has been submitted to the Council demonstrating why the 90 dwelling scheme, as originally proposed, could not support the full policy requirement for affordable housing and on-site open space. As confirmed by Officers, the developer's viability evidence has been independently verified by expert consultants appointed by the Council. Following completion of the Council's independent viability assessment it was agreed that the scheme could accommodate a financial contribution of circa £125,000, based on the mix and number of units originally proposed. Officers considered that it would be



appropriate for the contribution to go towards off-site open space improvements (circa £100,000) and local healthcare provision (circa £25,000).

Whilst Mr Daley makes reference to other approved schemes in the Borough whereby greater areas of on-site open space have been provided, this will no doubt have been in scenarios where developers have not been subject to comparable viability constraints.

Alternative Open Space Options

Since the last meeting, the applicant has considered the concern raised by Members regarding the lack of useable on-site open space and has provided a range of options which seek to provide some additional on-site open space rather than an off-site contribution. The loss of three 3-bedroom units equates to the financial contribution. The three options presented would deliver the following total amounts of green infrastructure across the site as a whole;

- Option 1 – Total of 11,305sqm, of which 594sqm is the area of the new area of useable open space, together with the LAP at 120 sqm.
- Option 2 – Total of 11,458sqm, of which 747 sqm is the area of the new area of useable open space, together with the LAP at 120 sqm.
- Option 3 – Total of 11,237sqm, of which 526 sqm is the area of the new area of useable open space, together with the LAP at 120 sqm.

The scheme could not accommodate any further loss of units and remain viable, neither could it accommodate the loss of larger units. As previously highlighted, the viability constraints on this site have been verified by the Council's independent consultants and such appraisals can only be considered on a site-specific basis. It is not appropriate, nor is it standard practice for such appraisals to factor in the profit or loss of other business ventures pursued by the same developer.

The applicant is in agreement with Officers that the 90 dwelling scheme, as originally submitted, would make the most efficient use of the site and would deliver wider public benefits by providing the contribution towards off-site open space improvements. However, there is the option of some additional on-site open space at the expense of three dwellings and in lieu of the off-site contribution, if this is preferred by Members.

Density

Notwithstanding the alternative options presented by the developer, it is considered that the density of the originally proposed scheme is entirely appropriate in the subject location. As confirmed in the Officer's Committee Report, the density of the development is only 23 dwellings per hectare and is clearly comparable and in most cases, less dense, than a wide range of residential new build schemes that have already been approved by the Council. In fact the density is virtually identical to the adjacent Marples Grange development. As highlighted, over a quarter of the site will comprise managed green infrastructure, with further soft landscaping created in the form of private front and rear gardens. Furthermore, the proposed dwelling numbers also reflect the capacity envisaged for the site in the Council's emerging Allocations document which specifically states that the site can accommodate "approximately 90 dwellings".

Adjacent Marples Grange development

There has been a number of suggestions that the subject scheme ought to make up for the perceived lack of open space provided as part of the developer's adjacent 'Phase 1' Marples Grange development.



Notwithstanding the confirmed viability constraints, it is entirely inappropriate for the subject development to be linked with the adjacent scheme. This is a standalone planning application for a residential development of 90 dwellings and it can only be expected to meet obligations which are necessary, relevant and appropriate to make the 90 dwelling scheme acceptable. Indeed if the applicant were seeking to justify a lack of open space based on an exceedance of obligations delivered on Phase 1, this would not be acceptable to the Council. The subject site can only therefore be expected to meet its obligations based on the scale and nature of development proposed as part of this application.

In any case, the existing Marples Grange development does actually provide approximately 10,000 square metres of open space, of which around one quarter forms open, accessible open space in the north west area of the development.

Affordable Housing

Whilst it is acknowledged that the scheme will be unable to deliver housing which meets the definition of affordable housing, as confirmed in the Committee Report, the development will nevertheless meet a range of core housing objectives for the Borough. Whilst Blackpool understandably wish to secure low-cost housing for existing residents (it should be noted that 46% of the homes proposed are 2 & 3 bed terraced and semi-detached), it is equally important for the Borough to be able to retain and attract economically active households. A high-quality housing scheme, as proposed in this application, can compete with the neighbouring authorities of Wyre and Fylde, at much more competitive sales prices. The delivery of a predominantly detached scheme will also assist in rebalancing the Council's existing housing stock which, as acknowledged by Officers has a low proportion of good quality, detached family housing.

Other Matters

Restrictive Covenants

The covenants imposed on the adjacent Marples Grange development are imposed as standard across all of Rowland Homes developments. Such covenants are not meant to be prohibitive but are imposed to safeguard residents themselves, as well as the Council and the developer from unlawful or incongruous alterations or installations. Specifically concerning solar panels, not all solar panels and related equipment can be erected without express consent from the Council. Ensuring that residents ask for prior consent allows the developer to advise them to check the regulations and to ensure that the equipment intended to be installed can be adequately supported in their preferred location.

There is no fee to residents to ask for prior consent and consent has never been unreasonably withheld. The covenant does not prevent the installation of solar panels on the front elevation where prior consent is given.

It should be noted that no request for prior consent for the installation of solar panels has been made by any resident on the adjacent Marples Grange scheme.

Sustainable Design and Energy Efficiency

New homes will be built to the required building regulations, incorporating energy efficiency and sustainable design measures. Such measures include floor, wall & loft insulation, thermally efficient windows and doors, energy efficient boilers and low energy lighting, all to assist in reducing the consumption of heat and power. Water wastage is also reduced through the installation of cisterns, taps and showers to reduce flow rates. Where provided, fridge freezers are minimum A- rated for energy efficiency.



Waste Management systems are also implemented during construction to reduce waste and promote the recycling of materials where possible.

Maintenance of LAP

The LAP would be installed to required standards and the appointed managing agent, who would deal with all other areas of open space, would be required to maintain it to these standards. If any issues needed to be reported, these would be made to the managing agent.

Wheatlands Crescent

The developer has confirmed that the planting required adjacent to Wheatlands Crescent, which was approved as part of the original Marples Grange consent is already programmed to be carried out during this current planting season (November to April), as is the case on all of their current developments.

Summary

The Council's own emerging Plan is seeking to deliver 90 units on the site in order to meet future housing needs. Councils have an obligation to maintain a five year supply of housing land and the delivery of this site will assist in maintaining this supply. The delivery of the subject site will make effective re-use of a longstanding vacant, brownfield site which has no realistic prospect of being developed for employment uses.

The 90 dwelling scheme also seeks to direct a sum of money towards local health care provision and off-site public open space improvements, contributing to wider community benefits.

Notwithstanding the viability constraints identified, the developer seeks to bring forward a high quality housing scheme which will assist in the rebalancing of the Borough's housing stock through the delivery of much needed family housing which seeks to retain and attract economically active households.

The application will deliver a low-density housing scheme, with over one quarter of the site comprising green infrastructure and all dwellings also benefiting from private gardens.

It is respectfully requested that Members seek to approve the residential development of the site.

Yours sincerely

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