



## Edenfield Community Neighbourhood Forum Rossendale Local Plan Examination

30<sup>th</sup> August 2019

### Matter 3 – Housing need and requirement

*Issue - Is the identified housing requirement of 3,180 dwellings between 2019 and 2034 (212 per year) justified and consistent with national policy?*

[Policy HS1]

#### a) Is the identified Housing Market Area appropriate and robustly-based?

##### Response:

Edenfield Community Neighbourhood Forum (ECNF) does not have a particular view on the use of the Borough boundary as the Housing Market Area. It is noted however that there is no clear evidence that this is the appropriate area to have selected therefore it is not possible to comment on whether its use is robustly-based.

According to the Rossendale [Local Plan Strategy Topic Paper](#) (August 2018) on page 8, the decision on the Area boundary was not based on quantitative or qualitative analysis and instead founded on local authority views, in discussion with others:

*“The Borough does not have a self-contained job or housing market though following discussion with neighbouring authorities it was agreed that the Borough boundary formed the most relevant geography for consideration of housing issues.”*

The Council’s [Strategic Housing Market Assessment 2019 Update](#) notes that a pragmatic decision was taken (para. 2.29):

*“The previous Rossendale SHMA (2016) concluded that although Rossendale is below the self-contained migratory threshold of 70%, none of the alternative Housing Market Area [HMA] locations explored has suggested a self-containment level significantly higher than that of Rossendale Borough in isolation. Given that the district has overlapping HMAs with a number of other authorities nearby, the SHMA considered it reasonable and pragmatic to take the administrative boundaries of Rossendale Borough as being a ‘best fit’ HMA for planning purposes, whilst acknowledging the Borough’s Duty to Cooperate with adjoining authorities to ensure that housing needs are met in full at a strategic level.”*



- b) The identified housing need of 212 dwellings per annum (dpa) is based on the standard method in the National Planning Policy Framework. Is the Council's application of the standard method in accordance with the methodology in the Planning Practice Guidance (PPG)? Is the use of baseline figures for the period 2016-26 and the 2016 affordability ratio justified?**

**Response:**

ECNF does not call into question the Council's application of the standard method, nor the use of baseline figures for the period 2016-26 and the 2016 affordability ratio.

- c) The housing need and requirement of 3,180 dwellings or 212 dwellings per annum (dpa), as identified in Policy HS1 in the Plan, is based on the minimum number of homes needed using the standard method. Is the proposed objectively assessed need (OAN) and the absence of an uplift justified and soundly based? In particular:**

- i. How does the housing need and requirement align with forecast jobs growth in the Employment Land Report and the employment land requirement in the Plan of 27 hectares between 2014 and 2034? What is the justification for planning for a lower level of housing than is needed to support baseline employment growth? What weight has been given to the Council's aspiration to reduce out-commuting in the process of determining OAN and the housing requirement?

**Response:**

ECNF has extensive questions relating to the so-called employment land '*requirement*' of 27ha.; these are addressed in their separate Statements and appendices (submitted by Alan Ashworth and Richard Lester). In short, revised calculations undertaken by ECNF conclude that the employment land requirement is more likely to only amount to some 11ha. Reassessments of the Council's employment projections and need, their safety margin and their land loss allowance - when combined with additional identified developable land - have led ECNF to this conclusion. It is therefore not possible to comment on the alignment of housing need with forecast job growth, and employment land requirement.

ECNF does not consider that the Council has a clear aspiration to reduce out-commuting. The Council has not sought to include policies in the Plan directly relating to such an aspiration; this may stem from the absence of a vision and spatial strategy, and the possibly scope for reduction not being used in any obvious way in the calculation of housing and employment land requirements.



- ii. What are the implications of the updated demographic modelling, employment growth forecasts and recommendations on housing need in the Strategic Housing Market Assessment (SHMA) Addendum produced in March 2019?

**Response:**

The [2019 SHMA Update](#) generates a figure of 204 dwellings per annum (dpa, para. 4.4), noting that this “is slightly lower than the 212 dpa figure in the Council’s emerging Local Plan as it relates to a different time frame in the 2014-based SNHP which generates a slightly lower level of household growth”. The Council’s consultants continue (paragraph 8.2):

*“Adjusting the 2014-based sub-national household projections to incorporate the latest 2017 MYE would increase the LHN to 210 dpa between 2019 and 2034.*

*The need to accommodate a sufficient economically-active workforce to accommodate projected economic growth. Should the Council plan for this level of economic growth, the Standard Method would provide insufficient housing to support the necessary increase in the local workforce; an uplift to between 236 dpa and 253 dpa.”*

This recommendation regarding the Council planning for a new level of economic growth, if accepted, would have to result in a reconsidered – and very different - Local Plan strategy in terms of making housing and employment land allocations. This would not be a way forward that ECNF would endorse, particularly as it would require entirely and fundamentally rethinking the whole Plan. ECNF perceives the consultants’ recommendation however as being intended to provide continuing justification for the scale of land allocations in the submission Plan, now that the housing requirement using the standard method is far lower than previously calculated (the [2016 SHMA](#) recommended that the need for additional housing in Rossendale was between 265 and 335 dwellings per year).

- ii. Does the housing need/requirement of 3,180 homes/212 dpa have appropriate regard to growth strategies and strategic infrastructure improvements in the borough or wider region?

**Response:**

ECNF finds this an impossible question to answer with any accuracy, when there is little or no information available in the Plan or examination documents relating these figures to any strategy for the Borough, nor beyond its boundaries.



- iii. Will the provision of 3,180 homes/212 dpa ensure that identified affordable housing needs are delivered?

**Response:**

ECNF cannot respond to this question either, as it will be for the Council to ensure – principally but not exclusively via s106 obligation contributions – that affordable housing requirements are met.

- iv. Is the Plan period for housing (2019 – 2034) sufficient to take account of long-term requirements and opportunities and consistent with national policy (taking account of the estimated date of Plan adoption in 2020)?

**Response:**

ECNF does not have a strong view on the Plan period ending in 2034. It is noted that other Plans recently adopted around the country have a similar end date (for example, the 2019-adopted [Barnsley Local Plan](#) has a plan period ending in 2033). However, because ECNF is deeply concerned that the Rossendale Local Plan's evidence base is fundamentally flawed (with regard particularly to the ill-founded justifications for employment and housing land allocations, the Green Belt releases that enable them and in particular, the allocation of land for 400 homes in Edenfield, west of Market Street), there is a case to be made for the Council extending the Plan period and reassessing its allocations in relation to housing requirements and providing employment land accordingly.

- d) Is the separate requirement for 456 dwellings in Edenfield justified and supported by sound evidence? To what extent is it based on strategic borough-wide needs and priorities? Does the figure take account of all potential forms of housing supply?**

**Response:**

ECNF's view that the separate requirement for 456 dwellings in Edenfield is not justified, nor is it supported by sound evidence. The 400-home development west of Market Street is the particular focus of ECNF's opposition. This site's allocation has not been based on strategic Borough-wide needs, as no such needs have been specifically identified in the Plan or its evidence base. Not all potential forms of housing supply have been taken into account either. These comments and conclusions are based on ECNF's own review of the housing requirement in the Borough, as set out in their evidence and housing land – HLA – appendices). In summary:

- Land west of Market Street was originally allocated for residential development when the housing requirement was far greater, despite early landscape analysis concluding that the greater part of the site contributed positively locally and should not be developed;
- Various errors have been made in the Council's quantitative assessments, e.g. in relation to accounting for permissions and completions;



- There are a number of sites which could be developed for housing, but which do not appear, or have been removed from the Council's calculations of housing land availability that should have been included (e.g. extant permissions with build-out not completed before 31 March 2019);
- The potential contribution of small sites (less than 5 homes), and that of larger windfall sites (for more than 5 homes), has not been taken into account;
- a proportion of the currently vacant properties throughout the Borough being brought back into use has not been taken into consideration;
- Potential yields on some sites should be increased;
- Around two thirds of the land allocated for employment is not required and some sites could be better used for residential development. Certain regeneration sites in particular would be more suited to re-use for housing; and
- There are no exceptional circumstances to justify the release of Green Belt land west of Market Street for housing.

ECNF also considers that the Council has not planned proactively for meeting housing needs in sustainable locations – where there are access constraints to residential development on otherwise suitable/ accessible/ deliverable sites, the authority should state in the Plan that positive interventions will be considered (e.g. site briefs or where appropriate, compulsory purchase).

Yours sincerely,

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