

Rossendale Local Plan Examination

Local Plan Examination Inspector's Matters, Issues and Questions

Matter 3 – Housing Need and Requirement

Hearing Statement

Peter Brett Associates

August 2019

On Behalf of Hurstwood Holdings





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1 INTRODUCTION

- 1.1 This Hearing Statement has been produced by Peter Brett Associates (now part of Stantec) on behalf of Hurstwood Holdings, and is submitted to the Examination of the new Rossendale Local Plan 2019 – 2034.
- 1.2 Over recent years Hurstwood Holdings has been promoting various sites in Rossendale for residential development through the ongoing consultation process on the new Local Plan, including land at Hurst Lane, Johnny Barn Close and Union Road. In June 2013, in response to the Green Belt and Urban Boundary Review consultation, we submitted a range of detailed development framework reports setting out how these sites could be sustainably delivered to provide much-needed new housing in the Borough.
- 1.3 In September 2015 we submitted further comments to the ‘Local Plan Part 2: Site Allocations and Development Management Policies’ document. This document was then abandoned in favour of the production of a new Local Plan. Accordingly, in October 2017 we submitted comments as part of the last round of consultation on the new Local Plan. We also then submitted further comments on behalf of Hurstwood Holdings in October 2018 in relation to the pre-submission version of the draft Rossendale Local Plan.
- 1.4 In parallel with the production of the new Local Plan, we have also held a number of meetings with the Council and submitted two planning applications for the sites at Hurst Lane and Johnny Barn Close. The land at Hurst Lane has since been granted planning permission for two dwellings (Ref: 2015/0308, dated 22 June 2017), and the land at Johnny Barn Close has outline planning permission for 30 dwellings (Ref: 2015/0517, dated 2 July 2018). The latter is currently part of proposed housing allocation H60.
- 1.5 More recently, we have also engaged with the Council on the Union Road site via the formal pre-application process, and a meeting was held with the Council in February 2019 in relation to this site (Ref: 2018/0063/PREAPP). A draft layout plan depicting how a residential scheme could be accommodated within this site is enclosed at Appendix A. Over the past few years we have been instructed to undertake various technical assessments of the Union Road site in preparation for a forthcoming planning application – these include a Landscape and Visual Assessment, Flood Risk Assessment and Transport Statement). Although the application was never formally submitted given the continued designation of the land within the Green Belt, these reports confirm that (i) the site is suitable and sustainable for residential development, (ii) the site can be removed from the Green Belt without offending any of the five ‘purposes’ set out at paragraph 134 of the National Planning Policy Framework (NPPF), and (iii) the development of this site can be achieved without any significant landscape impact. Should the Inspector decide it would be useful to have sight of these documents we would be pleased to provide them upon request.

- 1.6 Our client has therefore consistently engaged with the Council and Local Plan process at every appropriate juncture, and accordingly submit these further comments and confirm our intention to participate in the formal Local Plan Examination process.
- 1.7 For the avoidance of doubt, in this Statement we have intentionally only referred to the specific issues and questions that we wish to comment on and draw to the attention of the Inspector.

2 OUR COMMENTS

Matter 3 – Housing Need and Requirement

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

- 2.1 We do not consider that the proposed housing target is sufficiently ambitious and will constrain economic growth in the Borough.
- 2.2 Looking at the SHMA 2019, scenarios D (Employment Land Report led) and E (Experian Jobs Growth) both point towards higher housing need requirements of between 253dpa and 236dpa respectively. Accordingly, these targets would support between 70 and 90 jobs per annum over the plan period. The ELR at paragraph 9.10 makes clear that employment forecasts indicate there will be an increase of 1,800 jobs in the Borough between 2014 and 2034 (i.e. 90 jobs per annum), and the 'Policy On' scenario adds a further 318 jobs to the economic forecasts. Table 9.10 of the ELR highlights that a target of 220dpa, which we note is above the currently proposed target of 212 dpa, would only support 866 jobs in the period to 2034. With this in mind, it is clear that the lower figure of 212dpa will fall woefully short and not support anywhere near the level of employment growth forecast. This housing target has also not even been tested in the ELR, and so we cannot be certain what level of economic growth this figure aligns to.
- 2.3 The 2016 SHMA confirms that a housing target of 269dpa would represent the level of housing growth necessary to provide a sufficiently large labour force to support the latest Experian job growth forecasts for the Borough. The currently proposed housing target falls significantly short of this. In addition, the latest 2019 SHMA applies updated job estimates from more recent Experian forecasts, and identifies a housing requirement in the order of 236 to 253dpa to support the level of jobs expected. Clearly, the proposed level of housing delivery in the Borough falls below even the bottom end of this range.
- 2.4 Against the background described above, we are concerned that the level of housing currently proposed will fail to adequately support the economic growth potential of the Borough, and is therefore unjustified and unsound.



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APPENDIX A UNION ROAD – INITIAL PLANS

Union Road, Rossendale



Accommodation Schedule

House Type	No.	Sq ft.	Total Sq ft	Beds	Storey
PA21	15	602	9030	2	2
PA30	5	753	3765	3	2
PD48	10	1153	11530	4	2
PD32	8	967	7736	3	2
PB35	8	1085	8680	3	2.5
PA411	4	1248	4992	4	2
PT38	1	818	818	3	2
PT42	2	1222	2444	4	2
PD410	1	1334	1334	4	2

TOTAL	54	50329			
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Baldwin Design
Consultancy Ltd

Revision	Description
A 19.06.13	Mix amended following client comments
B 23.06.13	Text Change
C 07.04.14	Site Layout revised.
D 22.04.14	Mix amended following client comments
E 23.04.14	Plot 1 revised.
F 06.05.14	Turning head amended and affordable plots denoted by asterix
G 13.05.14	Plot substitution (Plots 40-43 & 50-53)
H 15.05.14	Plot position amendments
I 18.07.14	Footpath added
J 05.08.14	Foot path amended
K 03.09.14	Parking provision and turning head revised

Project Title:
Residential Development
Address:
**Union Road,
Rossendale**

Drawing:
Colour Site Layout

Drawing No:
HH/UR/CSL/01

Drawn: AWK	Date: 07/04/14
Scale: 1:500	Paper Size: A1

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