

**Response to Question 13 of Pre-
Hearing Note 1:**

**Housing Land Supply
Update Report**

Contents

Important Notice - Disclaimer	3
1. Introduction	4
Background on Housing Land Supply.....	5
Background on the housing requirement	5
Structure of the report.....	5
2. Calculating the 5 Year Requirement.....	7
3. The 5 Year Housing Land Supply 2019/20 to 2023/24	10
Small Sites Allowance	11
Breakdown of the Five Year Housing Land Supply at 1 st April 2019	12
Demonstrating a five year housing land supply.....	14
4. Housing Land Supply over the 15 Year Plan Period 2019/20 to 2033/34.....	15
5. Methodology to Identify Site Capacity and Delivery Trajectory	19
6. Conclusion.....	24

Important Notice - Disclaimer

In relation to the information contained within this report (and any other report relating to the findings of Rossendale's Housing Land Supply), the Council makes the following disclaimer, without prejudice:

- The identification of potential housing sites, buildings or areas does not imply that the Council would necessarily grant planning permission for residential development. All planning applications incorporating residential development will continue to be treated against the appropriate development plan and material planning considerations.
- The inclusion of potential housing sites, buildings or areas does not preclude them from being developed for other purposes.
- The boundaries that are attached to sites, buildings and areas are based on the information available at the time. The report does not limit an extension or contraction of these boundaries for the purposes of a planning application.
- The exclusion of sites, buildings or areas from the study (either because they were never identified or are identified as being constrained) does not preclude the possibility of planning permission for residential development being granted on them or for these sites being allocated. It is acknowledged that sites will continue to come forward (particularly small sites) that will be suitable for residential development that have not been specifically identified in this report.
- The capacity identified on the sites either relates to the numbers granted within a planning permission (where applicable) or is an estimate based on an appropriate density for the site in question. In arriving at these densities, Officers have taken into account locational and sustainability factors along with issues around local character and general views on the site. However, the capacities identified do not preclude densities being increased on sites, subject to details. Nor does it mean that the densities envisaged within the assessment would be appropriate and these would need to be assessed through the normal planning process when submitting a planning application.
- The study is only a 'snap-shot' of information held at that the time of writing. Therefore, some of the information held on the database will be subject to change over time. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled, whilst planning permissions may have lapsed on other sites.
- The listing of a site within the under-construction section does not mean that the start has lawfully started and applicants are encouraged to seek confirmation e.g. via the application of a Lawful Development Certificate.
- Information in the study has been based on thorough research and is to the best of our knowledge. Should you identify any discrepancies or inaccuracies in the report please email forwardplanning@rossendalebc.gov.uk and we can update the information accordingly.

1. Introduction

- 1.1 This Housing Land Supply report has been produced in response to Question 13 from the Rossendale Local Plan Inspectors' Pre-Hearing Note 1, which was received by the Council on the 14th of May 2019. It provides an update to the previous Five Year Housing Land Supply (5YHLS) report which covered the period 2018/19 to 2022/23¹. It then further expands on the five year supply position and provides information on the housing land supply for the whole emerging Local Plan period of 2019/20 to 2033/34. It also serves as a further update to the response to Question 12 regarding further supporting information on the suitability, availability and deliverability of the Local Plan allocations.
- 1.2 The report will include the following information, as requested in Q13 of the Pre-hearing Note:
- Updated five year housing land supply calculations (to 1st April 2019);
 - A summary table setting out estimated housing provision over the Plan period broken down by sources of supply e.g. planning permissions, remaining capacity on sites under construction, allocations from the emerging Local Plan and the small sites allowance;
 - A revised housing trajectory taking account of all sources of supply (updating the trajectory found in Appendix 4 of the emerging Local Plan);
 - Commentary on assumptions and methodology used to derive site capacity, density, delivery, phasing and so on;
 - Background tables of existing permissions and allocations including site areas, density, capacity, phasing and delivery and any further evidence.
- 1.3 The report is considered interim as it has been produced specifically for the Examination with a focus on the numbers of dwellings, rather than the further detail typically provided in the annual 5YHLS document and Authority Monitoring Report (AMR). This further detail (e.g. the proportion of brownfield/greenfield development and the size and type of dwellings delivered on specific sites) can be made available before the Examination hearings.
- 1.4 The usual annual reports will also be able to provide updates on any sites where information is currently outstanding. The Council is currently in the process of contacting agents and landowners for an updated position on site progress. Until this information is available, if it is unclear whether a material start has been made on sites with permission, a cautious approach has been taken and such sites have been identified as either remaining unimplemented or, if the permission was due to expire by the base date, removed from the supply. This is to avoid any possible overstating of the supply/deliverability position. Where further information on the deliverability of such sites is received, this will be included in the forthcoming annual 5YHLS report.

¹ The previous report was produced as part of the annual review of housing land and was published in March 2019; it was also submitted as supporting information for the Local Plan examination.

Background on Housing Land Supply

- 1.5 Paragraph 67 of the National Planning Policy Framework (NPPF) sets out that local planning authorities should identify a supply of:
- specific, deliverable sites for years one to five of the plan period; and
 - specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 1.6 This Housing Land Supply document identifies the deliverable housing supply in Rossendale for the five year period from 1st April 2019 to 31st March 2024 and those sites anticipated to be delivered in the ten year period beyond this (up to 2033/34).
- 1.7 Please note that the report has a base date of 1st April 2019 and therefore reflects the housing land supply as of this date. It reports on completions that have taken place in the previous financial year (2018/2019) and the remaining capacity on sites that were under construction, had an extant (current) planning permission for housing and other specific deliverable housing sites as of the base date.

Background on the housing requirement

- 1.8 The adopted Core Strategy (2011) is due to be replaced by the emerging Local Plan which has a housing requirement of 212 dwellings per year or a total of 3,180 dwellings over the 15 year period covered by the Plan (2019-2034). This figure was identified using the proposed standard methodology available at the time the draft Local Plan was being prepared. The Core Strategy is more than five years old so the housing requirement within it (of 247 dwellings pa) is now considered out of date. For the purposes of this report, the housing requirement of 212 dwellings per year will be the figure against which the future housing land supply is assessed but, for information, the previous Core Strategy requirement will be quoted in relation to historic housing completions. Any change to the housing requirement will be reflected in future updates of the 5YHLS report.
- 1.9 It is worth noting at this point that the Government has introduced a Housing Delivery Test (HDT) which is a percentage measurement of the number of net homes delivered against the number of homes required over a rolling three year period. The first HDT results were published in 2019 and measured delivery between 2015/16 to 2017/18. As the Core Strategy housing requirement was considered out of date by this time, the HDT used a housing requirement based on projected household growth². The HDT results for Rossendale are set out in Section 2.

Structure of the report

² As explained in the Housing Delivery Test Measurement Rule Book (MHCLG, July 2018), household projections were used in the HDT calculation for financial years up to and including financial year 2017-18, as the standard methodology for the minimum annual local housing need figure did not apply prior to this date. After this date the minimum annual local housing need figure will be used.

- 1.10 Section 2 discusses the current housing requirement, including an update on the number of completions which took place during the financial year 2018/19 (Appendix A provides further details). Section 3 sets out the current five year housing land supply position, updating this to the base date of 1st April 2019. Section 4 establishes the overall housing land supply position, incorporating the five year supply into the whole fifteen year period covered by the emerging Local Plan. Section 5 describes the methodology used to derive site capacity and projected delivery rates.
- 1.11 Appendix B provides further detail on all the sites included in the overall housing supply, including an update to the housing trajectory, as well as other information requested in Question 13. Appendix C provides further information on the status of the allocated sites in relation to their planning history and the number of dwellings to be provided within them.

Please note that throughout this document, the terms “allocation”, “allocated site”, “allocated land” etc. refers to the proposed housing allocations as identified at the Regulation 19 consultation stage of the emerging Local Plan (as listed in Policy HS2).

2. Calculating the 5 Year Requirement

Housing Delivery

2.1 Monitoring of housing completions shows that between 1st April 2018 and 31st March 2019, 134 (net) new dwellings were delivered in Rossendale (see Appendix A for a list of completions).

Core Strategy 2011 Adopted Housing Requirement

2.2 As stated in the Introduction, the housing requirement set out in the adopted 2011 Core Strategy is now considered out of date but, for information, this report presents an analysis of historic completions data against the previous requirement. It also sets out the latest HDT results as a comparison.

2.3 As shown in Table 1 below, a total of 1,340 dwellings have been completed in Rossendale between 1st April 2011 and 31st March 2019. Of these, 134 dwellings were completed in 2018/19, which represents 113 fewer dwellings than the Core Strategy annual average of 247 dwellings (or 78 fewer if assessed against the emerging requirement of 212). As a comparison, Table 2 measures the completions within the relevant time period for the HDT.

Table 1: Housing performance against Core Strategy Housing trajectory (2011 to 2019)

Year	Completions		Delivery against Core Strategy Average (of 247 p.a.)			Delivery against Core Strategy Trajectory		
	Actual Completions	Cumulative Completions	Annual Average of 247 houses	Cumulative annual average of 247 houses	Cumulative annual average undersupply	Core Strategy Stepped Trajectory	Cumulative Housing Trajectory	Cumulative under (-) and over (+) supply
2011/2012	119	119	247	247	-128	100	100	19
2012/2013	135	254	247	494	-240	170	270	-16
2013/2014	265	519	247	741	-222	221	491	28
2014/2015	224	743	247	988	-245	270	761	-18
2015/2016	122	865	247	1235	-370	270	1031	-166
2016/2017	192	1057	247	1482	-425	275	1306	-249
2017/2018	149	1206	247	1729	-523	275	1581	-375
2018/2019	134	1340	247	1976	-636	270	1851	-511

Table 2: Housing Delivery Test Results 2018 for Rossendale Borough Council

Number of homes required			Total homes required	Number of homes delivered			Total homes delivered	HDT: 2018 measurement	HDT: 2018 consequence
2015/16	2016/17	2017/18	2015/16 to 2017/18	2015/16	2016/17	2017/18	2015/16 to 2017/18		
221	217	185	622	122	195	149	466	75%	Action Plan and Buffer

Housing Land Supply Buffer

2.4 Paragraph 73 of the NPPF states that “Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies or, against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply [this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement].”

2.5 The HDT results for 2018 (published in February 2019) in Table 2 show that housing delivery in Rossendale was measured at 75% of the total requirement for the previous three years (2015/16 to 2017/18). This means that the five year supply must include a 20% buffer, in line with NPPF. In practice, this equates to an additional one years’ worth of housing to be added to the existing requirement. The buffer is designed to allow more opportunity to achieve planned long-term supply and ensure choice and competition in the market for land.

Housing Requirement based on the emerging Local Plan

- 2.6 Table 3 sets out the five year housing land requirement based on the emerging Local Plan target, including the 20% buffer. The figures from this table will be used to identify, in the next section of the report, the Housing Land Supply (in years) that Rossendale can currently demonstrate.

Table 3: Housing Land Requirement for Plan period 2019/20 to 2033/34

Serial	Component	Calculation	Amount
A	5 Year Requirement (212 dwellings per year)	212×5	1,060
B	20% Buffer (20% of A)	$1,060 \times 0.2$	212
C	Total 5 Year Housing Requirement (A+B)	$1,060 + 212$	1272
D	15 Year Requirement (A x 15)	212×15	3180

3. The 5 Year Housing Land Supply 2019/20 to 2023/24

3.1 Evidence contained in this report (as shown in the background tables in Appendix B) provides a break-down of the Council's supply of deliverable sites between 1st April 2019 and 31st March 2024. This information is correct as of 1st April 2019.

Choice of sites to include in the five year supply

3.2 The decision to include sites within the five year supply is based on the 2019 NPPF definition of a "deliverable" site, as follows:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans);
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

3.3 The five year housing land supply contains a mixture of sites allocated in the Local Plan (some of which have planning permission or are under construction) which the Council expects to come forward for development in the next five years alongside other committed sites. These other sites are not allocated but have either an extant planning permission for housing or are currently under construction. They include small sites under 5 dwellings and the remaining capacity on larger sites under construction where development had commenced prior to the Local Plan work.

3.4 In line with the NPPF definition, the five year housing land supply consists of the following deliverable sites (as of 01/04/19):

- The remaining capacity (i.e. number of dwellings) on sites that have planning permission for residential development and are currently under construction;
- The number of dwellings to be provided on sites with extant (current) unimplemented (i.e. not yet started) full residential planning permission;
- The number of dwellings to be provided on sites with extant outline residential planning permissions on sites of fewer than ten dwellings;
- The number of dwellings to be provided on major housing sites (ten or more dwellings) with outline permission where there is evidence to suggest that a full or reserved matters application will be determined shortly and that development will commence on the site within five years;
- The number of dwellings to be provided on sites where there is resolution to grant full planning permission (but no consent as yet issued) and where delivery is expected to commence within five years;

The categories above include a number of sites allocated for housing in the emerging Local Plan. Appendix C provides a summary of the current planning status of the allocations.

- Sites allocated for housing in the Local Plan without planning permission if there is further evidence to demonstrate that the site is deliverable i.e. likely to progress to a planning application shortly and development will commence within five years (for example if a willing landowner/developer is involved in the site);
- A small sites allowance (see below).

Small Sites Allowance

3.5 Housing land supply calculations typically include some form of allowance for sites that are not specifically identified but where it can be assumed they will come forward for development. Whilst paragraph 70 of the NPPF states that windfall sites (sites that come forward unexpectedly for housing) can be included as part of anticipated supply, the Council has decided not to include a specific windfall allowance. It has, however, identified a small sites allowance, based on analysis of historic housing delivery.

3.6 The Council's definition of a small site is one which will deliver fewer than 5 dwellings. In line with national guidance, such sites are not included in the Strategic Housing Land Availability Assessment (SHLAA), nor are they specifically allocated in the Local Plan. Monitoring of the number of dwellings built between 2010/11 to 2018/19 shows that an average of 18 dwellings per year have been built on small sites (not within existing residential gardens).

Table 4: Dwellings completed on small sites

Year	Total no. of dwellings completed on small sites including development within residential gardens	Houses completed on small sites excluding development within gardens	Total no. of dwellings completed within the Borough	% of completion on small sites (excluding garden development)
2010/2011	5	5	74	7
2011/2012	10	8	119	7
2012/2013	12	11	135	8
2013/2014	48	46	265	17
2014/2015	19	16	224	7
2015/2016	12	11	122	9
2016/2017	23	20	192	10
2017/2018	27	26	149	18
2018/2019	27	24	134	17
Total	183	167	1414	-
Average	20	18	157	11%

3.8 It is therefore considered appropriate to include a small sites allowance within the calculation of the 5 Year Housing Land Supply, as it is anticipated that delivery on small sites will continue in the future. When calculating the contribution from small sites an adjustment has been made for the first three years of the housing supply to take account of extant permissions. This means that the allowance is only applied in years 4 and 5 of the housing land supply calculation, rather than including an

allowance for the full five year period. This approach avoids double counting between the small sites allowance and sites already identified in the planning pipeline. Therefore, a small sites allowance of 18 dwellings per year has been factored in for years 4 and 5.

- 3.9 For more information regarding the small sites allowance please refer to the Small Sites and Windfall Sites: Advice Note which is included in the [Appendix A of the SHLAA 2018 report](#) (Submission library reference EB004).

Breakdown of the Five Year Housing Land Supply at 1st April 2019

3.10 Table 5 below summarises the sources of housing land supply for the next five years to 2023/24. This includes allocated sites as well as other committed sites which are not allocated in the Local Plan but have planning permission.

3.11 For ease of reference, the summary table in Table 5 broadly categorises each site within the 5YHLS, according to the type of site (i.e. allocation or other committed site) and by its current development status:

- Sites which have planning permission and are under construction (this may include parts of an allocation where a large part of the site is under construction but some of the land within the allocation boundary does not currently have planning permission)³;
- Sites with outline or full planning permission which have not yet been implemented (again, some allocations include a mixture of land within them which has planning permission and some land which does not; on the whole, allocations where a significant amount of land has permission have been placed in this category)⁴;
- Sites where there is a resolution to grant planning permission, subject to the signing of a Section 106 agreement;
- Sites with no planning permission at all or where most of the site does not have permission (all the sites in this category are allocations; some of them may be subject to a planning application which, as of the base date, had not been determined).

3.12 Table 5 distinguishes between allocated sites which fall into the above categories and other sites which make up the 5YHLS (Appendix C provides a table setting out how many dwellings have permission within each allocation). Table 6 presents the information in a slightly different way by breaking the supply down by development status first (e.g. whether a site is under construction or has permission) and then by the number of dwellings within these categories on allocated sites and how many on other committed sites.

³ An example is H33 which has a total identified yield of 63; part of the site has planning permission for 26 houses and is being built out, leaving a remainder of 37 dwellings on the rest of the allocation which does not have permission;

⁴ An example is H60 with a total yield of 80, where 30 dwellings have outline permission but the rest of the allocation does not have permission

Table 5: Breakdown of 5YHLS 2019/20 to 2023/24 per type of site

Source of Supply	No. of Dwellings with Permission Remaining to be Built in 5YHLS	No. of Dwellings without Permission in 5YHLS*	Total Dwellings 2019/20 to 2023/24
Allocations: remaining capacity on sites under construction	212	13	225
Allocations with unimplemented (extant) full planning permission	202	55	257
Allocations with unimplemented (extant) outline planning permission	88	30	118
Allocations with a resolution to grant planning permission	0	75	75
Allocations with no planning permission for housing**	10	894	904
Other committed sites: remaining capacity on sites under construction	142	0	142
Other committed sites with unimplemented (extant) full planning permission	115	0	115
Other committed sites with unimplemented (extant) outline planning permission	11	0	11
<i>SUBTOTALS</i>	<i>[780]</i>	<i>[1067]</i>	<i>[1847]</i>
Small Sites Allowance (2 years @ 18 dwellings per year)	0	36	36
TOTALS	780	1103	1883

*More detail on the number of dwellings with and without permission in the allocations is provided in Table 7 and Appendix C

**Includes 10 dwellings currently under construction on H72 – because the majority of this large site does not have permission, it has been included in the “no permission” category

Table 6: Breakdown of 5YHLS 2019/20 to 2023/24 per planning permission status

Source of Supply	No. of dwellings to be provided on allocated sites	No. of dwellings to be provided on other committed sites	Total Dwellings 2019/20 to 2023/24
Remaining no. of dwellings under construction	222	142	364
No. of dwellings with unimplemented (extant) full planning permission	202	115	317
No. of dwellings with unimplemented (extant) outline planning permission	88	11	99
No. of dwellings with a resolution to grant planning permission	75	0	75
No. of dwellings with no planning permission for housing	992	0	992
<i>SUBTOTALS</i>	<i>[1579]</i>	<i>[268]</i>	<i>[1847]</i>
Small Sites Allowance (2 years @ 18 dwellings per year)	0	0	36
TOTALS	1579	268	1883

3.13 Tables 5 and 6 show that the sites identified in the housing supply can deliver 1,883 dwellings over the next five years. Of these, 780 dwellings already have full permission, outline consent with an expectation that full permission or Reserved Matters will be granted shortly or are on sites under construction. The remaining 1,103 are expected to be delivered in the next five years – of which 75 dwellings have a resolution to grant permission and over 200 are pending determination of a planning application for

housing (based on the Local Plan estimated yield). The remaining sites are either owned / controlled by a willing landowner or developer who intends to progress planning permission and commence development within five years or there is other evidence to suggest the site is deliverable. More information on the deliverability of individual sites included in the 5YHLS (and the overall supply) can be found in Appendix B.

Demonstrating a five year housing land supply

Table 7: Number of years' worth of housing land supply

A	Five year housing land requirement without buffer	1,060
B	Annual housing land requirement without buffer	212
C	Five year housing land requirement inc. 20% buffer (212 x 5) + 20%	1,272
D	Annual housing land requirement inc. buffer (C/5)	255
E	Total Number of Dwellings to be delivered 2019/20 to 2023/24	1,883
F	Land Supply in years without buffer (E/B)	8.8
G	Land Supply in years with buffer (E/D)	7.4

3.11 Table 7 shows that Rossendale Borough Council can demonstrate an 8.8 year supply of deliverable housing sites for the period 1st April 2019 to 31st March 2024 as measured against the basic housing requirement of 212 dwellings per year. If the 20% buffer is included and this is translated into an annual requirement over five years, the supply reduces to 7.4 years. In either case, there is enough land to meet the five year requirement and incorporate the 20% buffer to help ensure the annual delivery target can be met.

4. Housing Land Supply over the 15 Year Plan Period 2019/20 to 2033/34

- 4.1 The Local Plan covers a 15 year period from 2019/20 to 2033/34 so, as well as the current identified 5YHLS, the overall housing land supply includes sites expected to be developed beyond the first five years.
- 4.2 In summary the overall housing land supply for the full Plan period is made up of the following site categories:
- 512 dwellings expected to be delivered on sites allocated for housing in the emerging Local Plan which are either: under construction, have full or outline planning permission or are pending determination of a new planning permission for housing (the “pending” sites within this already have an existing permission within the site);
 - A further 349 dwellings on land within the boundary of the allocations above which does not currently have planning permission;
 - 1,917 dwellings expected on sites allocated for housing in the emerging Local Plan which do not have planning permission for housing and do not have any previous residential planning history (although some of these have a pending planning permission);
 - 142 dwellings expected on other committed sites which are already in active construction;
 - 126 dwellings expected on other committed sites which have full or outline permission;
 - 216 dwellings expected on small sites from year 4 of the Plan period onwards (small sites allowance).
- 4.3 This gives a total of **3,262** dwellings made up of 2,778 dwellings on allocated sites, 268 from other committed sites and a small sites allowance of 216.
- 4.4 For those sites which are still pending determination, the estimated yield identified in the Local Plan has been used instead of the number of dwellings proposed in the application⁵. If planning permission is granted, it is acknowledged that, for some sites, the yield may change but it is not considered that this significantly affects the overall total.
- 4.5 Table 8 below sets out a more detailed summary of the number of dwellings expected to be delivered over the Plan period, broken down by specific source of supply and expected delivery timeframe. Appendix B breaks this information down further into individual years.

⁵ An example of this is H21 where an application has been submitted for 22 dwellings but because this has not yet been approved, the estimated yield from the Local Plan of 13 dwellings has been retained

Table 8: Overall Housing Land Supply

Source of Supply	No. of Dwellings with Permission Remaining to be Built	No. of Dwellings without Permission	2019/20 to 2023/24	2024/25 to 2028/29	2029/30 to 2033/34	Total No. of Dwellings
Allocations: remaining capacity on sites under construction*	212	53	225	25	15	265
Allocations with unimplemented (extant) full planning permission**	202	146	257	91	0	348
Allocations with (extant) outline planning permission***	88	50	118	20	0	138
Allocations with a resolution to grant permission subject to S106****	0	100	75	25	0	100
Allocations with no planning permission for housing*****	10	1917	904	845	178	1927
<i>Subtotal (Allocations)</i>	<i>[512]</i>	<i>[2266]</i>	<i>[1579]</i>	<i>[1006]</i>	<i>[193]</i>	<i>[2778]</i>
Other committed sites: remaining capacity on sites under construction	142	0	142	0	0	142
Other committed sites with unimplemented (extant) full planning permission	115	0	115	0	0	115
Other committed sites with unimplemented (extant) outline planning permission	11	0	11	0	0	11
<i>Subtotal (all sites)</i>	<i>[780]</i>	<i>[2266]</i>	<i>[1847]</i>	<i>[1006]</i>	<i>[193]</i>	<i>[3046]</i>
Small Sites Allowance	0	216	36	90	90	216
TOTALS	780	2482	1883	1096	283	3262

* This includes land under construction which forms part of a wider housing allocation (not all of which has planning permission) e.g. H11, H33

** This includes land where part of the site has permission / is under construction and the remainder was pending permission as of 01/04/19 e.g. H13

*** This includes 50 dwellings on H60 which do not have permission

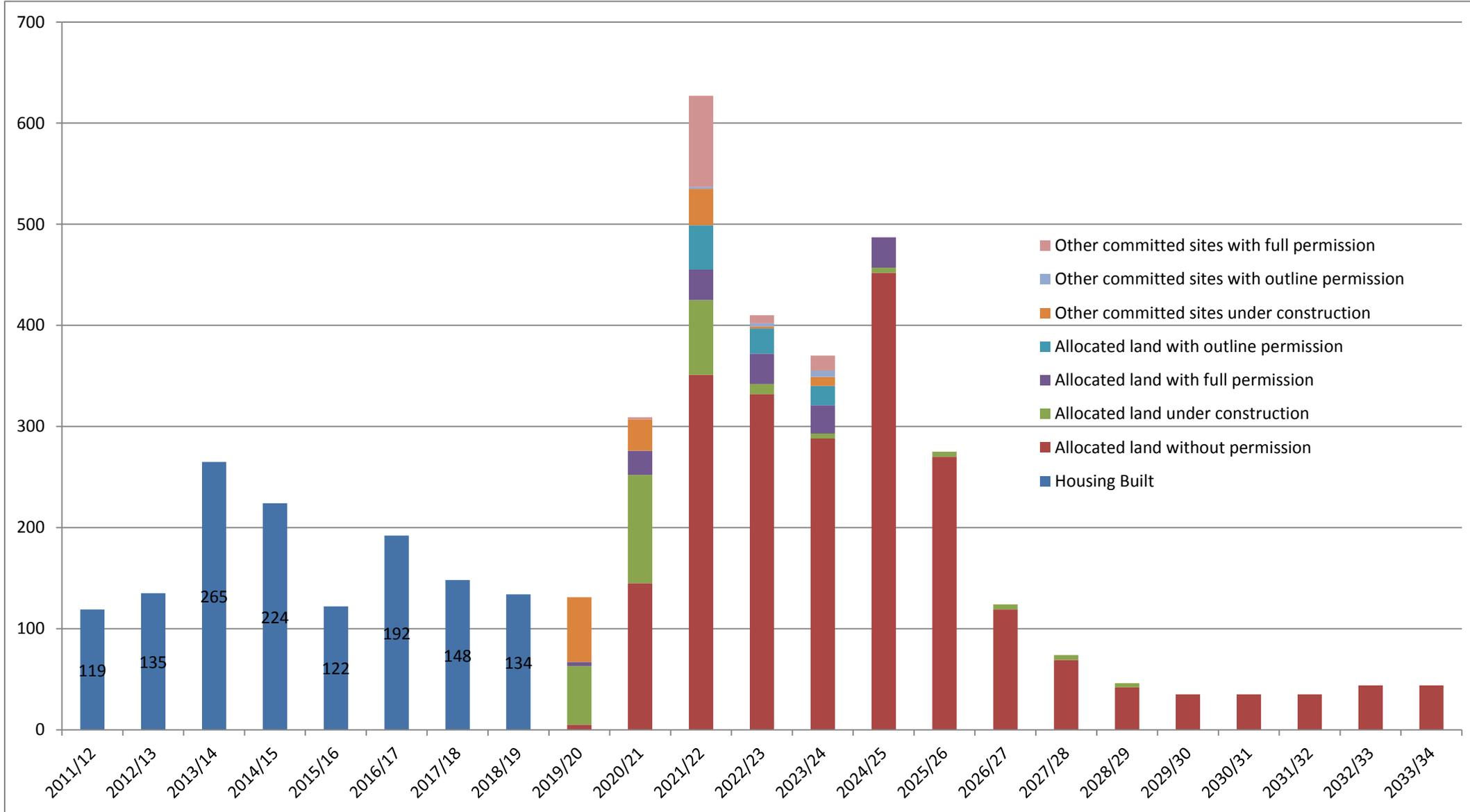
****This relates to H69 where there is resolution to grant outline permission

*****Includes 10 dwellings currently under construction on H72 – because the majority of the site does not have permission, it has been included in the “no permission” category

Table 9: Allocations Complete as of 1st April 2019

Allocation Ref.	Site Name	No. Completed
H53	Waterfoot Primary School	20
H67	Land Behind Buxton Street, Facit	28

- 4.6 Table 9 shows that of the allocations identified in the Local Plan, two sites are now fully completed and have been accounted for in the completions data for 2018/19. For completeness, these are still included in the list of sites for the trajectory in Appendix B but have a zero against the numbers of dwellings expected to be provided in future.
- 4.7 Graph 1 below shows the information from Appendix B in the form of a trajectory of expected housing delivery over the Plan period. This illustrates the total land area which has permission - which is made up of allocated sites (in full or in part) and other committed sites.



5. Methodology to Identify Site Capacity and Delivery Trajectory

5.1 This section provides a brief summary of the method and assumptions used to derive site capacity, density, delivery rates and timings. It will also provide further information on the Council's approach to lapse rates and windfall allowances. The SHLAA 2018 (Submission library ref. EB004) and Housing Topic Paper 2019 (EB006) also include helpful background information on the method for initial site identification.

Method to derive site capacity / density assumptions

Existing commitments (sites with planning permission / under construction)

5.2 If an allocated housing site had an existing consent, the number of dwellings granted permission was typically used as the basis for the estimated yield (capacity) of the site. For other committed sites (i.e. those not allocated in the Local Plan), the number granted consent is always used. The background table in Appendix B provides gross and estimated net areas for allocations and other committed sites of 5 dwellings and over.

Sites identified in the SHLAA

(See also Appendix D of SHLAA 2018)

5.3 As the SHLAA indicates, the initial list of sites for consideration came from a wide variety of sources, including Call for Sites, previously identified sites and sites identified by analysing broad areas of search. The boundaries of these potential sites were plotted, resulting in the identification of a gross site area.

5.4 For each potential site, the SHLAA identified key information including: location, type of land (i.e. greenfield, brownfield or mixed), current land uses / designations and physical constraints. Site characteristics were considered which could have the potential to reduce the area available for built development. These include:

- Woodland or mature trees (especially trees protected by a Tree Preservation Order)
- Steep slopes
- Flood Zone 3 or zone at high risk of surface water flooding
- HSE inner and middle consultation zones
- Culvert
- Ponds or reservoirs
- Streams, clough or rivers
- Allotments garden
- Graveyard / burial ground
- Active play areas, playgrounds and Multi User Game Area (MUGA)
- Biological Heritage Sites, Lancashire Ecological Network Core Area: the specific area of land covered by a "Stepping Stone" was excluded if they covered only part of the site; if they covered the whole or a large part of the site the area

- available for development was reduced by 50% to allow protection of part of the habitat);
- Electricity sub-station, high-pressure gas pipeline, electricity pylons
 - Areas in active use e.g. Car park
 - Existing dwellings/farmhouses/private gardens within the site (unless landowner expressed the wish to demolish the dwelling or develop its garden)
 - If landowner / developer expressed interest in only developing part of the site
- 5.5 For those sites which included any of these constraints, the next stage was to exclude the part of the site which was considered to be affected. Broadly speaking, this involved reducing the gross site area by the specific amount of land covered by the constraint or, where this could not be clearly identified e.g. for large areas of biodiversity/habitat, a percentage of exclusion was applied.
- 5.6 The remaining area of the site available for development was measured to produce an initial site area available for development.
- 5.7 This area was then reduced further to take account of the area of land which may be given over to uses beyond the typical allowance for gardens, access roads etc. This included land for larger roads, infrastructure, open spaces serving a wider area, major landscaping and so on. This was dependent on the size of the site, as follows:
- Area of site available for development below 0.4ha: 100% of the site identified as developable area;
 - Area of site available for development between 0.4ha and 2ha: 90% of the site identified as developable area;
 - Area of site available for development over 2ha: 75% of the site identified as developable area
- 5.8 In the initial stages, once the net developable area resulting from this had been calculated, a standard density was applied (i.e. a number of dwellings per hectare multiplied by the net developable area). This was usually 30 dwellings per hectare, unless a higher density was felt to be more appropriate due to the specific site characteristics, such as where the site involved conversion of a mill building or was located within the town centre.
- 5.9 For certain sites, the potential yield (also referred to as capacity or number of dwellings) generated through this exercise was again refined based on further assessment and consultation. Following the Regulation 18 consultation in particular, the density of development on brownfield sites was maximised as much as possible to reduce the need to allocate greenfield sites. This generated an average density on brownfield sites of approximately 100 dwellings per hectare.
- 5.10 Other reasons for amending site yield included responses to comments from the Heritage Impact Assessment, Landscape Assessment, other consultees such as Lancashire County Council (LCC) Highways and landowner preferences. If any further information was available, for example if the landowner or site promoter had produced an indicative site layout, this was also taken into account.
- 5.11 For sites without planning permission, the densities identified in the Housing Site Allocations table are a mixture of standard density multipliers (e.g. net developable area x e.g. 30dph) or have been generated by dividing the number of dwellings considered most appropriate for the site by the net developable area.

Lapse Rates

5.12 The Council has conducted some analysis of previous lapse rates which has looked at the number of dwellings on sites with an unimplemented planning permission⁶ over the past seven years (since 2012/13) where this has since gone on to expire (Table 10). This time period was chosen as it yields the most consistent historic data.

5.13 A yearly lapse rate was calculated by identifying (in each given year) the number of dwellings on sites where the permission had expired by the next financial year. For example, the table below shows that on the 1st April 2013, there were 334 dwellings on sites with an unimplemented planning permission within that year's five year housing land supply. By the 1st April 2014, 17 dwellings out of the 334 still extant in the previous year were on sites where the planning permission had expired without being renewed or implemented i.e. 5.1% of unimplemented sites from 2013/14 expired.

Table 10: Lapse rate analysis

Base date of 5YHLS	Total no. of dwellings in 5YHLS ⁷	Total No. of dwellings on sites with unimplemented permission	No. of dwellings on sites in previous 5YHLS that had expired by the base date	Percentage lapse rate of all unimplemented permitted sites from previous year
01/04/13	2465	334	/	/
01/04/14	713	227	17	5.1
01/04/15	2383	126	35	15.4
01/04/16	871	260	21	18.3
01/04/17	985	261	6	2.3
01/04/18	1840	260	7	2.7
01/04/19	1883	270	4	1.5
TOTALS	9257	1738	92	5.3

5.14 The Council has not applied a lapse rate to the housing land supply. Table 10 shows that, over the past 7 years, an average of 5.3% of dwellings originally included in the five year supply have been on sites where planning permission has expired. However these figures do not take account of those sites where, although permission has been allowed to lapse in the past, they have then gained a new permission and may have gone on to commence construction. The figures can also be skewed when a relatively large site expires, as is the case for 2014/15 where one site accounts for over 70% of the total dwellings lapsed. Data from the last three years shows that the lapse rate has been minimal.

⁶ i.e. sites which had an extant (current) planning permission but no material start had been made on the site to "implement" the permission

⁷ The total number of dwellings in the five year supply includes remaining capacity on sites under construction (and in previous years, specific deliverable sites without planning permission); the lapse rate cannot be applied to this total figure as some sites did not have permission or the permission had already been implemented - expiry would therefore not be relevant to these sites

Delivery rates

5.15 Housing delivery in the Borough tends to be distributed over a number of smaller scale developments with relatively few large sites being developed by the major housebuilders. The findings from analysis of typical lead-in times and build out rates are therefore difficult to apply universally as many sites are built by small builders responding to individual site conditions and personal circumstances. As the lapse rate analysis shows, there is a fairly low tendency for sites with permission to lapse. This suggests that speculative permissions are uncommon and that once permission is gained, most sites in the Borough are delivered relatively quickly. Evidence being gathered as part of the Council's Housing Delivery Test Action Plan work shows that the Council's pre-application planning service is being used effectively by developers, particularly for major applications, and this has resulted in Development Management decisions that have largely been positive in relation to housing development and that permissions are determined quickly. As recent permissions indicate, major sites are being brought forward efficiently.

5.16 Delivery rate assumptions i.e. when development is expected to commence and the number of dwellings expected to be built out per year, has largely derived from the following:

- An assumption that larger sites with fewer constraints and/or those within the control of larger housebuilders will be built out in the shorter term at a rate of 20 dwellings p.a. whilst smaller scale sites with more constraints are expected to commence in the medium to long term at a lower rate of delivery;
- Sites currently owned by the Council are generally expected to be delivered in the first five years as they have control over when the land is sold/marketed/permission is applied for and so on, unless there are particular constraints which means they are considered developable in the longer term;
- Development involving affordable housing delivery is expected to be built out in the short term at a higher annual build out rate;
- Historic typical build out rates on sites of a similar size and nature;
- Information on known constraints which need to be addressed / mitigated before development could commence;
- Identification of the timing of infrastructure requirements;
- Whether a developer / housebuilder has expressed an interest in a site and when they expect to proceed with a planning application.

And for sites with planning permission:

- For sites in the control of developers with a previous track record in the Borough or being undertaken by a larger housebuilder - historic / typical build out rate data for similar schemes they have undertaken, or sites they are currently building;
- Information from the developer on their expected completion dates.

5.17 The Council acknowledges that the build out rates may be higher for some sites but has adopted a cautious approach in order not to overstate the potential supply that could come forward, particularly within the five year housing land supply.

Past windfall rates

5.18 The Council has not applied a large site windfall allowance to the housing land supply. A "windfall" site is understood to be a site which has come forward for development (in this context, for residential use) on land which has not specifically been identified in the development plan.

- 5.19 Land which is identified in the development plan would usually be taken to mean a site which has been allocated for housing development and which is identified as such on a Policies Map. The last time Rossendale had an adopted list / map of allocated housing sites was for the 1995 Local Plan. Work on the Site Allocations DPD (proposed Part 2 of the Core Strategy 2011) ceased and the decision made to undertake a Local Plan review. A windfall site in this context, therefore, could be defined as a site which has not previously been anticipated as being a potential housing site either through being identified as part of the five year housing land supply or included for consideration in the SHLAA. This could include, for example, employment sites where the use has ceased or relocated and the site has unexpectedly become available for residential development.
- 5.20 Paragraph 70 of NPPF states that “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”. In light of this, whilst it is recognised that housing development has taken place on such sites in the past and they may continue to form part of the housing supply in the future, it is not considered a reliable source where a steady, ongoing supply of land could be quantified and projected forward. Furthermore, the Council undertook a thorough assessment of all potential sites in drafting the emerging Local Plan and identifying potential allocations. Therefore a cautious approach has been taken and a windfall allowance has not been included in the housing land trajectory.
- 5.21 A distinction has been drawn between a windfall allowance and a small sites allowance. The Council has included a Small Sites Allowance as it is considered that the evidence on the delivery of such sites is more robust, and such sites are likely to continue to come forward over the period of the Local Plan (see section 3 of this report).

6. Conclusion

- 6.1 This paper provides an update to the five year and overall housing land supply for the Local Plan period – 2019 to 2034.
- 6.2 It demonstrates that the Council has enough land within the five year supply to accommodate 1,883 dwellings which meets the five year housing requirement and allows for the 20% buffer required as a result of the Housing Delivery Test. It identifies that there are a further 1,379 dwellings expected to be built beyond the first five years, giving a total of 3,262 dwellings. This provides enough supply to meet the overall Plan period requirement of 3,180 dwellings.
- 6.2 The following Appendices provide further detail on the sites referred to in the body of the report, as well as information on gross and net site areas, net density, number of dwellings expected per year over the Plan period and a commentary on progress and deliverability.

APPENDIX A: HOUSING COMPLETIONS 2018/19

APPENDIX B: HOUSING TRAJECTORY AND BACKGROUND INFORMATION

APPENDIX C: CURRENT PLANNING STATUS OF ALLOCATIONS