Rossendale Civic Trust 13/08/2019 response to MIQs on Local Plan Policy HS6: Affordable Housing. Note, further comment in Purple shows needs not met with only121 over 7 years.

Matter 4 – Other housing needs

Issue – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy?

[Policies HS6 - H20]

Questions

Affordable housing including rural exception sites

- a) What is the total affordable housing need over the plan period (overall and by affordable housing type)?
- b) How will the affordable housing need be met (overall and by affordable housing type and from which sources)?
- c) Is the requirement of 30% on site affordable housing on sites of 10 or more (0.35ha or part thereof) justified and consistent with national policy? What is the justification for 0.35ha when the Planning Practice Guidance states 0.5ha or more?
- d) How will the requirement for older peoples housing and housing suitable for disabled people set out in Policy HS6 be applied to development proposals? Have these requirements been appropriately considered in the Local Plan viability evidence?

Policy HS6: Affordable Housing

New housing developments of 10 or more dwellings (0.35 hectares or part thereof) will be required to provide on-site affordable housing as follows:

- a) A requirement of 30% on-site affordable housing from market housing schemes subject to site and development considerations (such as financial viability). Of the overall housing contribution, at least 10% should be available for affordable home ownership unless the proposal provides solely for Build for Rent, provides specialist accommodation to meet specific needs (e.g. purpose built accommodation for the elderly), is a self-build proposal, or is exclusively for affordable housing, entry level exception sites or rural exception sites.
- b) On any rural exception sites there will be a requirement of 100% on-site affordable housing unless it can be demonstrated that a small element of market housing is required to make the scheme viable.
- c) The affordable housing shall be provided in line with identified needs of tenure, size and type as set out in the latest available information on housing needs. In particular the SHMA indicates there is a requirement for:

Older peoples housing, especially extra care and residential care, of around 1700 units by 2034

Housing suitable for Disabled people

Social rented housing in rural communities

d) Within larger housing developments, the affordable housing will be evenly distributed throughout the development. Where a site has been divided and brought forward in phases, the Council will consider the site as a whole for the purposes of calculating the appropriate level of affordable housing provision.

In exceptional circumstances, off-site provision or financial contributions of a broadly equivalent value instead of on-site provision will be acceptable where the site or location is unsustainable for affordable housing.

The size of the development should not be artificially reduced to decrease or eliminate the affordable housing requirement, for example, by sub-dividing sites or reducing the density of all or part of a site. The Council will consider the site as a whole for the purposes of calculating the appropriate level of affordable housing provision.

A. RCT supports HS6 subject to inclusion of a policy to identify sites for affordable and social housing to be purchased by the Council for use by RSLs for shared ownership and general let housing in order to meet: The Council's SHMA has demonstrated that there is considerable need for affordable housing in Rossendale and it states that the issue must be tackled to prevent the problem from becoming more acute. The study recommends that there is a need for at least 158 affordable dwellings to be provided in Rossendale per year in addition to market housing and potentially that there is a need for up 321 affordable dwellings per year.

- **B. RCT notes loss on sites**, such as Whinberry View from claims of unforeseen site problems.
- C. RCT note that in 1977 Rossendale had c7230 LA dwellings, 29.3% of c24680 total housing stock. In 2009 RSLs had 3503 self contained units and 1022 supported bedspaces to total 4525, or 14.8% of 30544 total housing stock. In 2016 Rossendale had 80 LA owned buildings, RSL's 4680 (14.8%), private sector 26950, Total 31710. From 2011 to 2016, gain 860 houses, of which 184 or 20% are social, but NOTE Together Housing Group had 66 sales from Right to Buy and Right to Acquire, and it was 150 from 2006-2011.
- D. RCT in 2019, thanks to RBC data of past years, notes a shortfall from previous and now HS6's aims, that perhaps mirror RCT's Overview 1 B, on density shortfalls: RBC Freedom of Information Request FOI/3684 on LOCAL PLAN POLICY 2 DENSITIES DELIVERED 2011-2015, came to conclusion. Rossendale could soon be "built out" with low density developments surely not in accordance with the Local Plan's Core Strategy, nor a way to deal with our national need to build for an increasing and not that rich population; and a need to take note of Census occupancy figures.
- **E. 2011 Core Strategy:** 200. PPS3 clearly states that providing affordable housing is a key role of the planning system. Evidence from the Strategic Housing Market Assessment 2008 demonstrates that there is an **annual requirement for 327 net additional affordable houses** in Rossendale, and recommends a 30 percent contribution target be set to deliver this need, of which 35 percent should be intermediate housing. In terms of size requirements, it also stresses the demand for four or more bedroom houses as well as one bedroom accommodation.
- **F. Now:** The Council's SHMA has demonstrated that there is considerable need for affordable housing in Rossendale and it states that the issue must be tackled to prevent the problem from becoming more acute. The study recommends that there is a need **for at least 158 affordable dwellings to be provided in Rossendale per year** in addition to market housing and **potentially that there is a need for up 321 affordable dwellings per year.**
- G. So over 7 years have we 2289 net additional affordable houses? SDR Rossendale Stock Data by year ending 2012 to 2018, shows gain of 121.

Private Registered Provider stock	2012	2013	2014	2015	2016	2017	2018
General needs - Self contained - Owned low cost rental accommodation by Local Authority area	3518	4095	4216	4198	4218	4249	4226
Supported housing - Owned low cost rental accommodation by Local Authority area	57	55	47	64	64	88	74
Housing for older people - Owned low cost rental accommodation by Local Authority area	963	398	328	329	401	290	358

Supported housing - Managed low cost rental accommodation by Local Authority area	39	45	117*	52	36	37	26
No. Low Cost Housing Units Owned where Purchaser has <100% Equity	34	32	30	30	39	27	48
Totals	4611	4625	4738	4673	4750	4004	4700
Totals	4011	4025	4/30	40/3	4758	4691	4732
LA owned stock	4011	2	0	0	80	80	0

^{*}Green Vale list 83 in 2 columns for 2014.

H. Note how much of 121 came from the 2012 - 2015 Pennine Empty Homes Programme:-

RBC Registered Provider 30UM: on 17 February 2011 - application states:-

However, following notification from the current RP landlord of a supported housing scheme in Rawtenstall of their intention to dispose of the building as part of a process of stock rationalisation, the Council now wishes to register as a social housing provider in order to acquire the ownership of this scheme, secure refurbishment funds from the HCA, and to carry out the landlord functions in the future.

Borough of Pendle 9 February 2012

11. An expression of interest was submitted by Rossendale Borough Council on behalf of the five Pennine Lancashire authorities for monies to develop various schemes to assist empty property owners to bring properties back into use. The Five Local Authorities and the Registered Providers are currently working up a bid which will be submitted to the Homes and Communities Agency in January 2012 for funding from April 2012.

RBC's Pennine Lancashire Empty Homes Proposal Supporting Statement last paragraph:-

Whilst this bid may appear ambitious in requesting 5.6% of the overall £100million funding and providing 16% of the proposed national outputs, and contributing to area based regeneration, green deal, and sustainable communities agendas. We are confident that our track record in delivery of largescale regeneration programmes, our strong established partnership, and our value for money unit rate of £10,889 per empty property demonstrates that we are a consortia that will guarantee success for this programme and lead the way in delivering innovative solutions for empty properties.

Rossendale Borough Council December 2015 FOI/3897 Response

Rossendale Borough is currently responsible for 345 properties, at the last count, as follows:-Blackburn with Darwen 47, Burnley 105, Hyndburn 29, Pendle 84, **Rossendale 80**,

Homes and Communities Agency 22 March 2017 FOI000800.

We are also advised that a small number of homes (9) included in Rossendale's allocation were delivered directly by Proffitts CIC as Purchase and Repair units.

Audit and Accounts Committee. 26th September 2017

The current position on the Empty Homes Programme is that of 359 properties taken onto the Programme the council have been returned 140 to their owners and **219 have been successfully transferred to Calico Homes' management..**

J. To achieve Policy HS6, as Registered Provider 30UM, RBC might have to get back into council housing: to identify sites for affordable and social housing to be purchased by the Council for use by RSLs???