

ROSSENDALE LOCAL PLAN 2019 – 2034
EXAMINATION HEARING STATEMENT
B&E BOYS LTD (**RESPONDENT REF. 5192**)

MATTER 19 – HOUSING SUPPLY AND DELIVERY

1. QUESTION 19 F

DOES THE PLAN IDENTIFY A SUFFICIENT SUPPLY OF HOMES TO MEET IDENTIFIED REQUIREMENTS OVER THE PLAN PERIOD?

- 1.1 On behalf of our client, we have a number of concerns relating to the way in which the Plan addresses the delivery of new homes.
- 1.2 Paragraph 9.10 of the ELR states that employment forecasts expect an increase of 1,800 jobs in Rossendale between 2014 and 2034 (90 jobs per annum). However, Table 9.10 of the ELR highlights that 220dpa only provides for 866 jobs.
- 1.3 In the first instance, we are concerned about a housing requirement that does not match aspirations for economic growth. It is critically important that the Plan provides sufficient homes to support economic development, reduce out-commuting and so that businesses are able to flourish.
- 1.4 This means allocating sufficient land, in the right location that will facilitate the delivery of homes at the right time and we are concerned that the Plan does not do this, which could lead to both housing and employment growth being constrained, a scenario that is entirely inconsistent with the Framework.
- 1.5 We would also question the delivery rates set out in the trajectory.
- 1.6 For example, we have concern over a number of the proposed allocations, many of which are subject to significant objection. One such site being H39 at Cowtoot Lane, Bacup, which is the subject of significant objection from the Highway Authority and, not least, the semi-professional football club who would need to be relocated before the site could even be considered to be developable. The Local Plan at page 141 shows the first 20 houses being delivered by 2021, which in our view is wildly optimistic.
- 1.7 Similarly, number of large sites are controlled by one developer (H12, H72 and H74), meaning that the delivery of around 680 new homes allocated in the Plan is reliant upon them alone; over 20%

of the total requirement to be delivered from 3 sites under the control of one developer. We would suggest that places a significant burden upon them and an over-reliance on the part of the Council.

- 1.8 Hourigan Connolly has significant experience relating to the delivery of large-scale housing developments. In February 2014 we completed a national study on the delivery of urban extensions. This study considered factors associated with bringing forward major urban extensions of around 500 dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. Based upon the analysis of the results received from Local Authorities, the Study suggest that the delivery of houses from urban extensions takes approximately 9 years from the date upon which work is started on an outline planning application. Whilst there were instances of speedier delivery, these were in the minority whereas there were many more examples of sites that took far longer to deliver houses, with many identified that were to deliver any houses at all.
- 1.9 On 31 October 2014 Savills (on behalf of Barratt) produced a study looking at delivery rates on urban extensions and concluded that on average across all sites analysed, an urban extension site starts construction on the first phase of housing more than four years after the submission of an outline application. Considering only sites coming forward since 2010, the average time taken to start on site drops to under three years after the submission of an outline application. The Savills work draws heavily on the Hourigan Connolly study but of course does not factor in the time necessary to prepare an outline planning application and all of the negotiations that precede it.
- 1.10 In November 2016 Lichfields published extensive research in relation to “How Quickly Do Large Scale Housing Sites Deliver”. It is notable that the Lichfields research identified that sites of circa 500 dwellings take 5 years to deliver dwellings following validation of a planning application but of course this does not factor in the time necessary to prepare an outline planning application and all of the negotiations that precede it.
- 1.11 The above-mentioned studies are mentioned to simply illustrate the point that the delivery of major housing schemes is not at all straightforward and is time consuming as has been proven by the time taken from allocation of the Strategic Site in the current adopted LDP to a grant of planning permission and a start on site.
- 1.12 The situation is clearly exacerbated when one developer controls a significant amount of the supply.
- 1.13 The Council’s Housing Land Supply Update Report suggests a claimed supply of 3,262 homes. This exceeds the housing requirement by 82 dwellings, which, setting aside whether the requirement is correct, would only require a small number of sites to amend their numbers or not come forward for the housing requirement to not be met. Our experience is that the failure of large site hits supply the hardest.
- 1.14 Accordingly, whilst we support the allocation large housing sites in principle, the Plan should in the first instance include a housing requirement that at least matches employment projections and thereafter should allow for and allocate additional sites to ensure that houses are delivered, particularly early in the Plan period and to introduce flexibility into the Local Plan as a whole.