

Edenfield Community Neighbourhood Forum

Rossendale Local Plan Examination Submission

29th August 2019.

Hope View Market Street Edenfield



Edenfield

Rossendale Local Plan Examination

Hearing Statement

Matter 19:

Housing Supply and Delivery

Alan G. Ashworth and Richard W. Lester.

Edenfield

Contents:

Matter 19 Housing Supply and Delivery.

Issue – Does the Plan identify sufficient land to enable the housing requirement of 3,180 dwellings to be delivered over the Plan period?

[Policy SD7]

Questions, Responses and Comments.

Suggested Revisions.

Alan G. Ashworth and Richard W. Lester: Questions, Responses and Comments.

- 1) **Question a:** Is the Council's approach to estimating supply from existing commitments justified and robust?
In particular:
a i) Is the non-application of a lapse rate justified?

Response: Rossendale Borough Council (RBC) should respond to this.

- 2) **Question: a ii.** Are the estimated lead-in times and build-out rates for each committed site, as shown in the housing trajectory, justified and soundly based? Where relevant, are the rates supported by clear evidence that sites are deliverable in line with the National Planning Policy Framework definition?

Response: RBC should respond to this. However, it should be noted the current trajectory for years 1 to 5 provides a buffer of 54.7%, some 34.7% over the number required.

- 3) **Question b:** Is the small site allowance justified and supported by evidence?

Response: The Housing Topic Paper (March 2019) considers small sites at pages 12, 13 and 14. In the period of eight years ending 31st March 2018, on average 20 (not just 18) dwellings per year were completed on small sites. It is reasonable to assume that this contribution rate will be maintained at the least. Indeed, there is potential for it to increase owing to proposed changes to the Urban Boundary. RBC weekly lists indicate that planning permission or prior approval was given for 74 dwellings on small sites in the 52 weeks commencing 11th June 2018. Another 4 dwellings on a small site received outline permission, and a lawful development certificate was issued for a dwelling disused for 20 years. Document *EL1.002jii Housing completions between 1st April 2018 and 31st March 2019* shows that (35 gross; 27 net) dwellings were completed on small sites in that year. Document *EL1.002k Response to Programme Officer on 09.07.19 re Q15 of Pre-Hearing Note 1* shows 101 dwellings under construction on small sites. It is reasonable to assume that the majority of these will be completed by 31st March 2020. It is therefore submitted that an annual small sites allowance of 20 is far too low and that a reasonable minimum would be at least 25. Small sites are not counted in the figure of 2,853 in Table 1.

It is reasonable to assume also that there will be windfall sites which are not small sites, that is, windfall sites capable of providing five or more dwellings.

- 4) **Comment:** On the basis of the information provided above the existing small site allowance is neither justified nor supported by sound evidence and should be increased to at least 25 per annum.
- 5) **Question c:** Has the Council undertaken a comprehensive assessment of housing capacity within the built-up settlement areas, and allocated all potential sites capable of accommodating 5 or more dwellings which are suitable, available and achievable?
- 6) **Response:** RBC have attempted a comprehensive assessment of housing capacity capable of accommodating five or more dwellings but there are examples of eight sites with planning approval for a total of 63 dwellings, some already started, which have not been included. **(See ECNF – HLA 4, omitting Lindon Park, The Hollies, Pleasant View Farm, The Hollins and 21-23 Burnley Road East.)** There may be others from this and other sources. **(See ECNF – HLA 2 & HLA 8.)**
- 7) **Question d:** Should an overall lapse rate be applied to allocations within the supply calculations?

Response: RBC should respond. However, any figure will need to be fully evidenced.

8) **Question e:** Are all of the allocated sites confirmed as being available for development within the Plan period?

Response: RBC should respond to this.

9) **Question f:** Does the Plan identify a sufficient supply of homes to meet identified requirements over the Plan period?

Response: In the Submission Version Written Statement 2,853 dwellings were identified however this figure excluded 270 with Extant Planning Approval; 40 from agreed site yield increases and 375 from small sites. These increase the total to 3,538 which is significantly in excess of the 3,180 requirement. These figures also exclude any contribution from the 1,207 Empty Homes or from any large Windfall Sites.

10) Comment: The list itself is incomplete but in reality there is an excess of a minimum of 358 without the inclusion of the alternative sites for allocation and the re-allocation of surplus employment land. **(See Appendix ECNF – HLA 1-8.)**

11) **Question g:** Does the Plan identify sufficient land to accommodate at least 10% of the housing requirement on sites of 1 hectare or less, in line with the National Planning Policy Framework?

Response: RBC should respond to this.

12) **Question h:** Is the Council's approach to calculating five year housing land supply, as set out in the Council's response to the Inspector's Pre-Hearing Note (Question 13), robust and in line with national policy and guidance? In particular:

Question h i: Is the application of a 20% buffer supported by the evidence?

Response: The Housing Trajectory in Appendix 4 of the Local Plan identifies 1640 dwellings to be completed in years 1 to 5 giving a buffer of 54.7%, which is way over the 20% required.

13) **Question h ii:** Is there clear evidence to support the inclusion of sites which fall under category b) in the National Planning Policy Framework's definition of deliverable? E.g. sites which have outline permission for major development, are allocated in the Plan, have a grant of permission in principle or are identified on a brownfield register.

14) **Response:** RBC should respond to this.

15) **Question iii:** Is the inclusion of a small site allowance justified?

Response: Refer to Question b, paragraph 3.

Suggested Revisions to the Plan.

The Housing Site Allocation list needs to be revised to include:
a number of the dwellings from the alternatives provided in Appendix ECNF – HLA 2;
updated yields as shown in ECNF – HLA 3; and
the sites listed in Appendix ECNF – HLA 4.
Additionally, Site H72 should be removed from the list and policy HS3 deleted.
The Employment Land Requirements along with the associated policies should be revised accordingly.
(See appendices ECNF – SoC; ECNF – HLA 1-8; ECNF – ELR 1-7 and ECNF GBP 1-7.)

A.G.Ashworth and R.W. Lester
29.08.19.