



# **HEARING STATEMENT – MATTER 3 HOUSING NEED AND REQUIREMENT**

## **ROSSENDALE LOCAL PLAN EXAMINATION**

### **TAYLOR WIMPEY (UK) LTD**

Date: August 2019

Pegasus Reference: (KW/GL/MAN.0299/R006)

**Pegasus Group**

| **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**DESIGN** | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

**CONTENTS**

1. INTRODUCTION..... 2

2. MATTER 3: QUESTION A – HOUSING MARKET AREA ..... 3

3. MATTER 3: QUESTION B – STANDARD METHODOLOGY BASELINE ..... 5

4. MATTER 3: QUESTION C – TOTAL HOUSING REQUIREMENT ..... 6

5. MATTER 3: QUESTION D – HOUSING REQUIREMENT IN EDENFIELD ..... 10

APPENDIX 1 – UPDATED NATIONAL POLICY POSITION

## **1. INTRODUCTION**

1.1 Pegasus Group have been instructed on behalf of their client, Taylor Wimpey (UK) Ltd, to prepare Hearing Statements to the Rossendale Local Plan Examination (EiP) in support of their land interests in the Borough. This relates to the following sites, which are both allocated in the submitted plan:

- Land west of Market Street, Edenfield (within Housing Allocation H72); and
- Grane Village, Helmsore (within Housing Allocation H74).

1.2 This Statement deals with Matter 3 'Housing Need and Requirement' which addresses the following issue:

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

---

## 2. MATTER 3: QUESTION A – HOUSING MARKET AREA

### [Policy HS1]

#### a) Is the identified Housing Market Area appropriate and robustly-based?

- 2.1 The previous Rossendale SHMA (December 2016) (**EB003**) undertook a detailed assessment as to whether Rossendale Borough comprised a self-contained HMA. The assessment demonstrated that over the past 10 years or so, the Borough had experienced a weakening level of self-containment, with migratory patterns expanding, more people moving into Rossendale Borough from the adjoining Greater Manchester authorities and more residents commuting into Bury, Rochdale and Manchester City to work than before.
- 2.2 The SHMA concluded that although Rossendale was below the self-contained migratory threshold of 70% (as previously set out in the NPPG), none of the alternative Housing Market Area (HMA) areas explored suggested a self-containment level that was significantly higher.
- 2.3 It goes on to state that:
- "As Rossendale Borough is a predominantly rural district with overlapping HMAs with a number of other authorities nearby, it is considered both reasonable and pragmatic to take the administrative boundaries of Rossendale Borough as being a 'best fit' HMA for planning purposes.*
- Nevertheless, it is accepted that the situation is highly complex with strong housing and economic relationships between Rossendale Borough and other adjoining authorities. Meeting the full housing needs within these overlapping HMAs has required co-operation between the various authorities in these adjoining Strategic HMA areas, and specifically the LPAs of Bury, Rochdale, Blackburn with Darwen, Hyndburn and Burnley. RBC, through the duty to cooperate, should undertake further discussions to determine how this interdependence impacts upon housing requirements within the wider HMA, and how it will be addressed." [2016 Rossendale SHMA, page 36]*
- 2.4 The SHMA Update (March 2019) (**EB002**) confirms this is still the case, with the Duty to Cooperate Statement (**SD008**) noting that the actual level of containment is 61%, whilst also confirming that Rossendale has undertaken extensive discussions/ engagement on this matter with the authorities listed above (as well as Calderdale and the GMCA), and agreed that the borough boundary was the best HMA for Rossendale to use.
- 2.5 It is also pertinent there is significant overlap with Greater Manchester (Rochdale and Bury), which the (Greater Manchester Combined Authority) GMCA considers to be a self-contained HMA for the purposes of the Greater Manchester Spatial Framework (GMSF), and given the size and regional significance of the GMSF it is suggested that this position is supported, to avoid any additional complication or delay (as the GMSF has already been subject to substantial delays).

- 
- 2.6 In fact, given that the GMSF is due to proceed as a Mayoral Led Strategic Plan, Rossendale would not actually be able to directly link with it for local plan purposes.
- 2.7 Finally, it is notable that national policy (2019 NPPF) and supporting guidance (NPPG) has been updated since the SHMA was originally published, confirming that when the standard methodology figure is used then this should be assessed at the district level.
- 2.8 We do not support the use of the standard methodology figure for the reasons set out below, but do consider the housing market area to be appropriate and robustly based, in line with the evidence within the 2016 and 2019 SHMAs and the Duty to Cooperate Statement.
- 2.9 That said, the lower than recommended level of containment does raise the potential for unmet needs to be generated in the wider area, and whilst none of the individual authorities adjacent to Rossendale have requested they take any of their unmet need (or vice versa), the GMCA have asked if Rossendale can accommodate Greater Manchester's need.
- 2.1 Whilst the level of this need has yet to be confirmed (due to delays to the GMSF), it is likely to be significant, given the GM Mayor Andy Burnham's repeated delaying of the GMS and desire to minimise Green Belt release in the GMSF area. Whilst we disagree with that approach, more could be asked of Rossendale, which could justify an uplift to the standard methodology, to provide some flexibility/ future proofing in case Rossendale are required to meet any of GM's needs, and we address this in more detail in the next section.

### 3. MATTER 3: QUESTION B – STANDARD METHODOLOGY BASELINE

**The identified housing need of 212 dwellings per annum (dpa) is based on the standard method in the National Planning Policy Framework. Is the Council’s application of the standard method in accordance with the methodology in the Planning Practice Guidance (PPG)? Is the use of baseline figures for the period 2016-26 and the 2016 affordability ratio justified?**

- 3.1 As noted in the question, the **212 dpa** housing target is based on the standard method as set out in the NPPF, using the 2014 based sub national household projections (SNHP) across the 10 year period 2016-2026, combined with the 2016 affordability ratio’s.
- 3.2 However the NPPG (para 2a-004-20190220) confirms that, when using the standard methodology, the 10 year period should start with the current year (so 2019-2029) and use the most up to date affordability ratio (which is 2018).
- 3.3 This generates a reduced standard methodology figure of **197 dpa** over the period 2019-2029 (a reduction of 7%). Interestingly the underlying 10 year projected household growth has increased since 2016 (from 177 dpa to 187 in 2019) however affordability has improved (from a ratio 6.14 to 5.85), which reduces the upward adjustment, and this is the reason for the overall reduction.
- 3.4 It is also pertinent that this affordability position has fluctuated significantly since 2016, moving from 6.14 up to 6.43 in 2017 before reducing to 5.85 in 2018, suggesting some volatility in local house prices and/ or wages. If this position were to swing again next year, in combination with increasing household growth then the standard method number could increase back above 212.
- 3.5 Notwithstanding this, the national guidance is clear that the government supports ambitious authorities who want to plan for growth, with the standard methodology representing a minimum starting point (as confirmed paragraphs 11 and 60 of the 2018 NPPF, and paragraph 2a-010-20190220 of the NPPG), which does not account for additional housing demand that may arise from future government policies, economic growth or other demographic change during the plan period.
- 3.6 As such, the Councils application of the standard methodology does not accord with the NPPG, as it uses a historic baseline. This more than likely reflects the time when this figure was agreed by the Council (sometime during 2017) and has simply been taken forward into the submission plan.
- 3.7 That said, the NPPG is clear that the standard method is only a starting point and that plans that exceed this figure will be supported, where this is justified. We consider an uplift is justified in Rossendale and address this in the next section.
- 3.8 Both the NPPF and NPPG still confirm that a local housing need assessment is required to take account of all factors, specialist housing requirements etc. It should also be noted that housing supply and delivery only form one part of creating a sustainable development plan for an area. Through the Local Plan process, there is a need to align many considerations including economic growth forecasts and aspirations

---

#### 4. MATTER 3: QUESTION C – TOTAL HOUSING REQUIREMENT

**c) The housing need and requirement of 3,180 dwellings or 212 dwellings per annum (dpa), as identified in Policy HS1 in the Plan, is based on the minimum number of homes needed using the standard method. Is the proposed objectively assessed need (OAN) and the absence of an uplift justified and soundly based?**

- 4.1 Paragraph 60 of the Revised NPPF confirms that local plans submitted after 24<sup>th</sup> January 2019 should use the Government’s Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.
- 4.2 Rossendale submitted their plan on 25<sup>th</sup> March 2019 and have pursued a standard method figure which has led to a reduced target, from **265 dpa** in the Regulation 18 version (based on the 2016 SHMA) to **212 dpa**, representing a reduction of 20%.
- 4.3 As noted in the previous section, this standard method figure is now out of date (as it uses 2016 affordability ratios over the period 2016-2026), with the current figure (using the 2018 affordability ratios over the period 2019-2029) standing at **197 dpa**, or a 26% reduction.
- 4.4 With reference to the current national policy position (as set out in more detail at **Appendix 1** – which forms an update of our previous representations) we consider that the standard method does not represent the Council’s OAN and that there are compelling reasons and ‘exceptional circumstances’ that would warrant Rossendale opting for a higher requirement.

***i) How does the housing need and requirement align with forecast jobs growth in the Employment Land Report and the employment land requirement in the Plan of 27 hectares between 2014 and 2034? What is the justification for planning for a lower level of housing than is needed to support baseline employment growth? What weight has been given to the Council’s aspiration to reduce out-commuting in the process of determining OAN and the housing requirement?***

- 4.5 Put simply, the housing requirement in the submitted plan does not align with the forecast jobs growth in the Employment Land Report (ELR) (February 2017) (**EB017**) or the employment land requirements in the plan.
- 4.6 Scenario D within the 2019 SHMA sets out the housing required to support projected job growth over the plan period (2019-2034) within the Council’s ELR (using Experian’s September 2016 UK Local Market Forecasts Quarterly and 2017 mid-year population estimates (MYE)). Job growth is projected at 90 jobs per annum, or 1,350 total over the plan period, which is consistent with the projections in the 2016 SHMA. This generates a housing requirement of **253 dpa** (down from 269 in
- 4.7 A further scenario using the same 2017 MYE but 2018 Experian projections, generates a job growth figure of 73 jobs per annum (1,095 across the plan period) and a housing requirement of **236 dpa**.
- 4.8 As such, a figure of 212 dpa will clearly not support the level of job growth projected within the 2019 SHMA.

- 4.9 Further clarification is provided in the ELR, confirming employment forecasts expect an increase of 1,800 jobs in Rossendale between 2014 and 2034 (90 jobs per annum as per SHMA scenario D), whilst the 'Policy On' scenario adds another 318 jobs (in B1a/b and B8 classes) equating to 2,118 jobs or 106 per annum.
- 4.10 However, Table 9.10 of the ELR highlights that 220 dpa (Scenario 6) will only provide for 866 jobs between 2014 and 2034, or 43 a year. The proposed 212 dpa figure was not tested within the ELR, but would likely be lower than 43 and considerably below the 90-105 figure projected.
- 4.11 This suggests the proposed housing target may meet less than half the jobs growth in the borough, which could result in unsustainable commuting patterns, slower economic growth and a lack of labour force mobility. The most recent data for 2017 from the Business Register & Employment Survey, published by the Office for National Statistics, indicate that Rossendale accounts for an estimated 3.2% of total employment in Lancashire (21,000 jobs in the District/652,000 in the sub-region). In 2015 the figure was 3.8%, meaning Rossendale's sub-regional employment share has been declining in recent years. If it doesn't achieve the jobs growth outlined in the employment scenarios of the SHMA (73-90 jobs per annum), Rossendale risks seeing its jobs share fall even further. It is therefore important that the housing targets align with the future labour market growth aspirations outlined in the SHMA, which can help the District to grow its employment base in the long-term.
- 4.12 In respect of employment land requirements, Table 9.16 in the ELR confirms that a housing figure of 220 dpa (Scenario 6) would support 27.15 Ha of employment land, suggesting that the proposed housing and employment requirements are aligned. That said, this table also suggests that Experian baseline job growth of 90 jobs per annum (Scenario 1) would require 30.27 Ha of employment land, which is 12% more than proposed, which again suggests that proposed target does not align with need and may need to be increased, so it does not stifle economic growth.

***ii) What are the implications of the updated demographic modelling, employment growth forecasts and recommendations on housing need in the Strategic Housing Market Assessment (SHMA) Addendum produced in March 2019?***

- 4.13 In summary, the 2016 SHMA suggested an OAN range of between **265 and 335 dpa**, with Rossendale pursuing a figure of **265 dpa** within the Regulation 18 plan.
- 4.14 The 2019 SHMA suggested a range of between **204 and 253 dpa**, with Rossendale pursuing a figure of **212 dpa** within the submitted plan.
- **Scenario A: Standard Method (2019-2029) = 204 dpa** – This uses the 2014 SNHP over the period 2019-2029 with the 2017 affordability ratio, which have since been superseded, which is why it differs from the 197 figure as set out in question b.
  - **Scenario B: 2014 SNHP (2019-2034) = 198 dpa** – This extends the 2014 SNHP figures (with 2017 affordability ratio) over the full plan period, which does not align with national guidance, but provides a sensitivity test.



- **Scenario C: MYEs 2017 (2019-2034) = 210 dpa** – This is the same as scenario b but using up to date mid-year population estimates, again does not align with national guidance, but provides a further sensitivity test and indication that underlying population growth is increasing between the 2014 and 2017 projections.
- **Scenario D: Employment ELR Led= 253 dpa** – as noted in part i, this is based on meeting projected job growth from the ELR of 90 jobs per annum.
- **Scenario E: Experian Jobs Growth= 236 dpa** - as noted in part i, this is based on meeting projected job growth from the most recent Experian forecasts which equates to 73 jobs per annum.

4.15 Accordingly the demographic scenarios range from **198 to 210 dpa**, which is broadly in line with the 212 dpa figure proposed in the submitted plan (with a 2016/2017 base) and the 197 figure generated by the standard methodology (at August 2019), suggesting that the underlying demographics haven't changed significantly in recent years.

4.16 The employment led scenarios range from **236 to 253 dpa**, which has slightly decreased since the 2016 SHMA, where the equivalent to Scenario D suggested a minimum requirement of **269 dpa**. Either way, as noted in part i, the proposed dwelling figures falls well short of meeting the economic growth needs of the borough and should be uplifted on this basis, a position that is supported by Lichfields in their conclusions in the 2019 SHMA (para 8.2, part 2).

***iii) Does the housing need/requirement of 3,180 homes/212 dpa have appropriate regard to growth strategies and strategic infrastructure improvements in the borough or wider region?***

4.17 The Invest in Rossendale Economic Development Strategy (2018-33) looks to create 1,600 new jobs, and support 27 Ha of employment land allocated in the Local Plan.

4.18 At the County Level, Lancashire has secured a £320m Growth Deal, specifically designed to address the failure to deliver transport infrastructure, a key barrier to growth, and to establish for the first time a transport investment programme, under the direction of Transport for Lancashire (TfL), commensurate with Lancashire's economic and housing growth opportunities and challenges. This investment programme will ensure key locations can fulfil their potential as growth corridors and major industrial, commercial and transport hubs for Lancashire as well as neighbouring economies. It will also maximise the connectivity opportunities afforded by new national and regional initiatives, including HS2, Airport City, Media City UK, Northern Hub, Atlantic Gateway and Liverpool SuperPort.

4.19 In addition, the Lancashire LEP Strategic Economic Plan (SEP) recognises that places such as Rossendale, are equally capable of taking advantage of being adjacent to growth opportunities in neighbouring city-regions, especially in Liverpool and Manchester. The Growth Deal positions the connectivity solutions necessary to maximise these key cross-boundary opportunities.

4.20 In respect of strategic infrastructure, and particularly transport, Policy TR1: Strategic Transport in the submitted Local Plan sets out a number of strategic transport investments which would help address some of the constraints which have been identified in terms of future development potential including:

- Improving links to Greater Manchester and the M60/M62 and enhancements to the A56; and,
- Developing the potential of the East Lancashire Railway for both transport and tourism purposes.

4.21 It is clear from the above that there are multiple opportunities and funding streams for improving strategic infrastructure within Rossendale, however this is likely to require a more ambitious housing target to ensure that this investment can be secured and these improvements made in the next plan period.

4.22 In respect of improvements to the A56, it is noted that widening (as has been informally suggested by the Council and LCC) is unlikely to be practical around Edenfield due to land ownership issues and the proximity of the Edenfield allocation, so the Council will have to consider other options here.

4.23 It is our view that the Council should focus all its efforts on the East Lancashire Railway, given that this is an existing piece of infrastructure in need up upgrade and modernisation.

***iv) Will the provision of 3,180 homes/212 dpa ensure that identified affordable housing needs are delivered?***

4.24 The 2019 SHMA confirms that there is acute affordable need in Rossendale, ranging from **102 - 170 dpa**, which equates to between 48% and 80% of the Council's chosen housing requirement.

4.25 It is also unclear whether these figures take account of existing affordable stock that has been lost to 'Right to Buy', which is now accepted as a major factor across the country and would obviously increase affordable need further.

4.26 It is evident that this need will not be met (even at the lower end of the range), given that the affordable requirement in Policy HS6 is 30%, and the fact that viability issues in the borough suggest that this will not be achievable on all sites.

4.27 As such, the Council should consider an uplift to the total housing figure to aid affordable delivery, in accordance with paragraph 2a-024-20190220 of the NPPG, and this position is endorsed within the 20198 SHMA.

***v) Is the Plan period for housing (2019 – 2034) sufficient to take account of long-term requirements and opportunities and consistent with national policy (taking account of the estimated date of Plan adoption in 2020)?***

4.28 Paragraph 22 The 2019 NPPF confirms that strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities. Given the plan is unlikely to be adopted before 2020, the proposed plan period to 2034 would not cover a 15-year period, and as such the Council should consider amending this.

## **5. MATTER 3: QUESTION D – HOUSING REQUIREMENT IN EDENFIELD**

**d) Is the separate requirement for 456 dwellings in Edenfield justified and supported by sound evidence? To what extent is it based on strategic borough-wide needs and priorities? Does the figure take account of all potential forms of housing supply?**

5.1 Neither the 2016 or 2019 SHMA assess housing need at a localised/ 'settlement by settlement' level on the basis that Rossendale represents a single Housing Market Area. Indeed, such an assessment would be very difficult given the geographical morphology of the borough, with several settlements blurring into each other in a contiguous urban form due to topography and historic settlement patterns spreading along valley floors and basins.

5.2 Instead it is based on suitable, available and deliverable site capacity within Edenfield, which has been identified through the SHLAA and Green Belt Study, which has established that 'exceptional circumstances' exist for Green Belt release in this location.

5.3 Edenfield is a sustainable settlement with a range of services including:

- Edenfield Church of England Primary School
- Edenfield Parish Church
- Newsagent
- 2 x Public Houses
- Chemist
- Butchers
- Bakers
- Cafe
- 2 x takeaways
- 3 x hair and beauty salon
- Cricket Club

5.4 It is also well connected to the larger Town Centre of Rawtenstall (3.5km north) and District Centre of Haslingden (4km north west).

- 
- 5.5 In terms of strategic needs the figure of 456 represents 14% of the total requirement and therefore cannot be considered to have a major impact on need/ delivery in other areas. What it does do, is provide an opportunity to restructure and rebalance the housing market in Rossendale, by allocating housing in a more affluent location, more closely connected to Ramsbottom and the urban fringe of Greater Manchester to the south. This will provide more aspirational family housing and provide choice and liquidity in the local market, while also including the Council Tax profile for the Council.
- 5.6 The figure does take account of all forms of housing and supply as it is to be read alongside the other policies in the plan requiring/ permitting affordable, elderly, adaptable and self-build housing.

---

## APPENDIX 1 – UPDATED NATIONAL POLICY POSITION

5.7 Paragraph 11 confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.8 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination.
- 2a-024-20190220 - An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.9 Paragraph 2a-010-20190220 then sets out the circumstances when a higher figure than the standard method might need to be considered:

*"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."*

5.10 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that exceptional circumstances are only required to justify a figure that's lower than the standard method:

*"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*

*Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."*

5.11 In the case of Rossendale, we consider there are compelling reasons and exceptional circumstances that would warrant Rossendale opting for a higher housing need requirement.

5.12 Taylor Wimpey also have some fundamental concerns with the standard methodology as a whole. Notably, the standard methodology removes the consideration economic growth and instead pegs the housing requirement to past trends and development patterns with affordability considered the only significant additional indicator of demand/ need.

5.13 At its starkest, this significantly accentuates existing inequalities across certain geographies, such as the north/south divide, but it can also be witnessed, and lead to disparities, at more local levels too.

5.14 The ONS themselves acknowledge the limitations of the projections at page 7 of the governments standard methodology consultation published in late 2018:

*"They do not take account of how many people may want to form new households, but for whatever reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue."*

5.15 The government have also acknowledged that the limitations of the current methodology, and the fact that it will not deliver the national target of 300,000 homes per year (with the 2014 projections achieving 266,000, so 10% short, whilst the 2016 projections were almost 30% short) and have committed to changing it over the next 18 months to ensure that the national target is met.

5.16 This clearly demonstrates that the methodology is a top down assessment which is being retrofitted to meet a rigid national target rather than objectively assessing local needs as it is supposed to.

- 
- 5.17 Whilst we have not yet seen or reviewed how the government intends to change the methodology, it seems likely that the basic methodology and inputs will stay the same (i.e. government projections with adjustments for affordability market signals and some form of cap) and that the caps and adjustments will simply be increased to meet the higher requirement. If this is the case, it will clearly exacerbate existing trends and accentuate inequalities even further. However, we will need to see what the Government propose, and we will respond accordingly.
- 5.18 What is clear is that there is still some uncertainty relating the standard methodology and the approach to be used. Therefore, we do not believe Rossendale should rely on the standard methodology until the issues set out above are addressed, and we reiterate again, that even when it is utilised it must be treated as a minimum requirement and is simply the starting point for determining the number of homes a Local Plan must provide. It does not represent a cap and its use does not automatically result in a sound plan where all development needs are met.
- 5.1 Based on past and anticipated employment growth within the area, and potential unmet need in the Greater Manchester HMA, we believe there are and sound reasons within Rossendale that would support an uplift from the standard methodology which could be regarded as representing 'exceptional circumstances'. Moreover, this Local Plan process represents an ideal opportunity to address any shortfalls or mismatch between the standard methodology approach and the government's overall target for 300,000 homes are built per year.