



# **HEARING STATEMENT – MATTER 4 OTHER HOUSING NEEDS**

## **ROSSENDALE LOCAL PLAN EXAMINATION**

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

Date: August 2019

Pegasus Reference: (KW/GL/MAN.0299/R007)

**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 4: QUESTIONS A-D – AFFORDABLE HOUSING INC RURAL EXCEPTION SITES .	3
3.	MATTER 4: QUESTION E-I – GYPSIES, TRAVELLERS AND TAVELLING SHOWPEOPLE....	5
4.	MATTER 4: QUESTION J-T – OTHER HOUSING PROVISION.....	6

---

## **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 4 'Other Housing Needs' which addresses the following issue:

**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?**

---

## 2. MATTER 4: QUESTIONS A–D – AFFORDABLE HOUSING & RURAL EXCEPTION SITES

### Policies H6 - H20

#### **a) What is the total affordable housing need over the plan period (overall and by affordable housing type)?**

2.1 The SHMA 2019 (**EB002**) identifies a net annual affordable housing need of between 102 and 170 dwellings per annum over the plan period, which is a significant proportion of the locally assessed need based on the standard method (204 dpa) of between 50% and 83%. The SHMA 2019 identifies an indicative split of 70% for affordable rent / social rent and 30% for intermediate housing / starter homes.

#### **b) How will the affordable housing need be met (overall and by affordable housing type and from which sources)?**

2.2 Meeting the affordable housing need in full is unlikely to be realistic as this must balance against the impacts that the policy requirement has upon the viability of development. Taylor Wimpey consider that the Policy HS6 needs to be sufficiently flexible so that the affordable requirement does not undermine the delivery of the plan. Indeed, we note that the Economic Viability Assessment (**EB019**) identifies viability issues with the 30% affordable requirement in Zones 1, 2 and 3. We note that further details will be provided in a Supplementary Planning Document and we therefore reserve the right to comment on the SPD when it is consulted on.

2.3 As such, Taylor Wimpey welcome the Council's flexible approach in Part a of Policy HS6, in applying a 30% requirement for market housing schemes "*subject to site and development considerations (such as financial viability).*"

2.4 Taylor Wimpey also welcome the Council's flexible approach in Part c of Policy HS6 which says that the tenure, size and type of affordable provision be based on the '*latest available information on housing needs*' rather than any prescriptive requirement.

2.5 This allows the plan to be flexible and individual schemes to respond to more localised needs at the time they are being considered.

#### **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?**

2.6 Taylor Wimpey consider that the policy threshold is inconsistent with national policy since no justification is provided as to why a lower 0.35ha threshold is proposed.

---

**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?**

- 2.1 It is not clear in Policy HS6 how the requirement for affordable older peoples housing and housing suitable for disabled people will be applied to development proposals. The policy does not provide any clarity or certainty for Taylor Wimpey, as it not clear whether older people’s housing or housing suitable for disabled people will be expected from every development or what proportion will be expected.

---

**3. MATTER 4: QUESTION E-I – GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE**

**e) Does the Council's Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2016) provide a robust assessment of needs in Rossendale?**

**f) What is the identified requirement for the provision of additional permanent pitches in the borough over the Plan period? Does Policy HS18 reflect these needs and set a clear strategy for provision, in line with national policy?**

**g) Is the proposed intensification of use on existing sites at Tong Lane and Cobland View justified and deliverable, and sufficiently clarified in the Plan?**

**h) Is the proposed transit site at Futures Park suitable, achievable and available? Does the flexible approach to the land-use mix at Futures Park, as set out in Policy EMP6, have implications for delivery of the transit site?**

**i) Do the criteria in the bullets in Policy HS18 provide a robust and fair framework for assessing potential windfall sites that come forward over the Plan period?**

3.1 Taylor Wimpey do not wish to provide any comments in relation to the above.

---

#### **4. MATTER 4: QUESTION J–T – OTHER HOUSING PROVISION**

##### **j) Would Policy HS7 optimise the use of land in the area and achieve a significant uplift in average density in line with national policy?**

- 4.1 The supporting text of Policy HS7 seeks to optimise the use of land by requiring densities in excess of 40 dwellings per hectare in town centres and higher densities on sites within the urban boundary and within 300m of a bus stop. Taylor Wimpey consider that this would lead to a significant uplift in average density in line with national policy.

##### **k) Is the threshold of 10 or more new dwellings (0.35 hectares or part thereof) set out in Policies HS10 and HS11 justified and consistent with national policy?**

- 4.2 Policy HS10 requires housing developments of 10 or more new dwellings (0.35 hectares or part thereof) to make provision for open space and recreation facilities, where there are identified local deficiencies in the quantity, accessibility or quality and/or value of open space and recreation facilities. This should be on-site for housing schemes of 100 or more dwellings. For housing schemes of 10 to 99 dwellings or where this is not appropriate, payment of a financial contribution towards off-site provision or improvements to existing open spaces and recreation facilities will be required. No justification is provided for the thresholds referred to in Policy HS10, and we would also highlight that the Council's Open Space and Play Equipment Contributions SPD, referred to in the supporting text, is from 2008, and is therefore considered out of date.
- 4.3 Policy HS11 requires housing developments of 10 or more new dwellings (0.35 hectares or part thereof) to pay a financial contribution towards improvements to existing playing pitches in the Borough where there is an identified local need. Again, no justification is provided for the thresholds referred to in Policy HS11.

##### **l) Is Policy HS8 justified? Specifically, is it viable and are there any implications for the delivery of other requirements such as infrastructure and affordable housing? Does it apply to all development? Was a threshold considered?**

- 4.1 Policy HS8 seeks to introduce optional accessibility standards (at least 20% of housing to be wheelchair adaptable) and national internal space standards and we comment on these in turn.

##### ***Access - meeting the needs of elderly or disabled residents***

- 4.2 Part A of Policy HS8 requires at least 20% of any new housing development to meet the needs of elderly or disabled residents or be easily adaptable; subject to site-specific factors and viability. Whilst we welcome the flexibility provided within this policy and would highlight that site specific factors such as topography are a major issue in Rossendale, we do raise concerns with the 20% starting point.
- 4.3 It is worth reiterating the NPPG (paragraph 56-007-20150327), which confirms that based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings) of the Building Regulations. The evidence in the SHMA 2019 falls well

short of demonstrating the need of a 20% target. There is no information in relation to the size, location, type and quality of dwellings needed, and there is no information in relation to the accessibility and adaptability of the existing stock.

- 4.4 It also appears that the policy is intended to apply to all new housing developments including those with viability issues in Zones 1, 2, and 3 when taking account of other infrastructure requirements and affordable housing.
- 4.5 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

***Internal space - national space standards***

- 4.6 As with the elderly housing requirement, we have concerns with the application of the nationally described space standards on the basis that the need has not been sufficiently demonstrated within the evidence to meet the requirements of the NPPG (paragraph 56-020-20150327). No evidence has been provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed.
- 4.7 We also have concerns around the viability of this policy. It is evident from the Economic Viability Assessment, which applies the nationally described space standards, that affordability housing provision at 30% is not viable in Zone 1 and some sites in Zone 2 and Zone 3.
- 4.8 In respect of the space standards, the NPPG also requires that transitional arrangements are considered following adoption to enable developers to factor the associated costs into future land acquisitions, and there has been no discussion of this in the plan or evidence.
- 4.9 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

**m) Does policy HS9 apply only to residential gardens in the urban area boundaries? If so what is the justification for this?**

- 4.1 Policy HS9 supports additional dwellings within private residential gardens that are within the urban boundary. Policy HS9 is applied only to residential gardens in the urban area boundaries without justification. The NPPF at paragraph 70, does not set such a restriction and simply says that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

Policy HS9 would accord with national policy if it applied to all residential gardens and not just those within the urban boundary, since the policy also sets several criteria to ensure that the additional dwellings within residential gardens do not undermine the amenity and distinctive character of the area.



**n) Is the 100 dwelling threshold for the provision of open space on site in Policy HS10 justified?**

- 4.1 Policy HS10 requires housing development of 100 or more dwellings to provide on-site open space. Not only is there no up-to-date evidence which justifies the threshold referred to in Policy HS10 but the Open Space & Play Equipment Contributions SPD (2008) identifies a threshold of 50 or more dwellings to provide on-site open space.
- 4.2 Furthermore, to be in line with paragraph 96 of the NPPF, Policy HS10 should be based on an up-to-date assessment of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision, and this is not considered to be the case here. The Open Space & Play Equipment Contributions SPD was adopted in September 2008 and is informed by the Rossendale Open Space Strategy published in July 2008. The SPD and Open Space Strategy are over 10 years old and do not provide an up-to-date assessment on need or opportunities for new provision. In the absence of an up-to-date assessment Policy HS10 is not considered to be consistent with national policy.

**o) Is Policy HS10 clear as to when and where development will be expected to contribute towards Suitable Alternative Natural Green Space (SANG). Will the Supplementary Planning Document (SPD) referred to in Policy HS10 also deal with SANG's and when is it expected that the SPD will be adopted?**

- 4.3 This policy confirms that the Open Space & Play Equipment Contributions SPD will be updated to discuss minimum local standards and appropriate financial contributions. Taylor Wimpey therefore reserve the right to comment on these local standards and financial contributions as and when the SPD is updated and consulted on.
- 4.4 The policy later refers to, how in Whitworth and Bacup in particular, but not exclusively, contributions will be sought for Suitable Alternative Natural Greenspace (SANGs) to minimise recreational pressure on sensitive habitats. Taylor Wimpey's concerns relating to SANGs is set out in our representations to Matter 16.

**p) Does Policy HS11 apply to all new housing development above the threshold or only where there is an identified need for playing pitches (new or required improvements to existing)?**

- 4.5 The 2019 NPPF is clear at paragraph 96 that local plans should seek to accommodate open space, sport and recreational facilities when it is needed. Policy HS11 requires housing developments to pay a financial contribution towards improvements to existing playing pitches in the Borough where there is '*an identified local need*' and therefore aligns with national policy.

**q) Does Policy HS14 appropriately deal with the effect of replacement dwellings on protected species?**

- 4.1 Taylor Wimpey considered that Policy ENV4 appropriately deals with the effect of all development proposals on protected species, including replacement dwellings, and that it is not necessary to deal with matter again at Policy HS14.

---

**r) Is Policy HS14 consistent with national policy with particular regard to replacement dwellings in the Green Belt? What is the justification for an increase of up to 30% (volume) not considered to be materially larger?**

- 4.2 The prescriptive restriction that replacement dwellings within the Green Belt should not be more than 30% (volume) larger than the dwelling it replaces has not been justified. Indeed, although the 30% threshold has historically been used by several Council's, the NPPF outlines no such threshold.
- 4.3 We consider that the assessment of whether a replacement dwelling is materially larger requires sound planning judgement on a case by case basis. For instance, there may be some instances where exceptions to this threshold may be acceptable e.g. where the proposal provides additional floorspace with no significant alterations to the building's envelope or external appearance (such as basements extensions).
- 4.4 As such we would request that this threshold is removed or that justification is provided.

**s) Is Policy HS16 consistent with national policy? Does HS16 apply to proposals in the Green Belt? Do all of the criteria have to be met for a proposal to accord with the Policy? Should proposals be expected to deliver a net gain in biodiversity?**

- 4.5 The criteria listed in Policy HS16 is based on the Conversion and Re-Use of Buildings in the Countryside SPD which was adopted in March 2010. The SPD was prepared pre-NPPF and is therefore considered out-of-date. The NPPF outlines no such criteria for the conversion and re-use of buildings in the countryside and it is therefore considered that Policy HS16 is inconsistent with national policy and not justified.
- 4.6 Taylor Wimpey considered that Policy ENV4 appropriately deals with net gain in biodiversity for all development proposals and that it is not necessary to deal with matter again at Policy HS16.

**t) What is the justification for the threshold of 50 dwellings in Policy HS20?**

- 4.1 No justification is provided for the threshold of 50 dwellings in Policy HS20.