

Rossendale Local Plan Examination

RBC Housing Land Supply Update Report October 2019

Response by Alan G. Ashworth and Richard W. Lester

1. Table 2 on Page 5: Summary of Overall Housing Land Supply

- 1.1 It was agreed at the hearing on 10th October 2019 that:
the yield for H12 Reedsholme Works should be 110, not 97; and
the yield for 2017/0640 Weir Hotel should be 6, not 5.

Table 2, amended accordingly, is reproduced below:

Source of Supply	Years 1-5	Years 6-10	Years 11-15	Total
Remaining dwellings on allocated sites	1367	1112	217	2696
Remaining dwellings on other committed sites	268	100	87	455
Sub Total	1635	1212	304	3151
Small Site Allowance	36	90	90	216
Total	1671	1302	394	3367

- 1.2 If the small sites allowance is increased from 18 to 25 dwellings per annum in line with our hearing statements, that would give another 84 dwellings over the plan period (12 years x 7 extra dwellings).

- 1.3 Planning approvals from 11th June 2018 to 31st March 2019 have been examined. Those records and others show that the following committed sites were not taken into account in Table 2. There may be other extant permissions omitted from the calculations in Table 2: it is hoped that RBC will review their records and provide a complete list.

2015/0238 Horse & Jockey, Market Street, Edenfield	10 dwellings
2018/0018 & 2018/0220 New Troughgate Farm, Bacup	1
2018/0321 Bridleway House, Newbigging Av, Waterfoot	1
2018/0345 Hr Barn Piggery, Roundhill Rd, Haslingden	1
2018/0381 2 Carr Head, New Barn Lane, Rawtenstall	1
2018/0399 The Glory former PH, 1222 Burnley Rd, Loveclough	2
2018/0611 Higher Moss Farm, Bamford Road, Turn	2
2019/0025 Pinner Lane Cottage, Crawshawbooth	1
2019/0033 Barn Annexe, 101 Gincroft Lane, Edenfield	1
TOTAL	20

1.4 Approval 2019/0006 (purportedly a lawful development certificate but not in the prescribed form) confirms that planning permission 2006/0205 for three additional flats at 460-462 Newchurch Road, Stacksteads is extant. Approval 2019/0006 is listed in Table 1, Appendix 1 as providing two of the 455 dwellings from other committed sites. The officer report for 2019/0006 does not suggest that any of the three additional flats have been completed or are under construction - therefore the yield from this site should be three, not two.

1.5 Sites in town centre regeneration areas could provide 150 dwellings in Years 1-10.

1.6 The annual small sites allowance should be at least 25 dwellings. As previously submitted, this is amply justified by recent completion rates on small sites, the number of dwellings currently under construction on small sites and the rate at which planning approvals are being issued for small sites. Furthermore, given that Policy HS9 in the draft Local Plan supports, with conditions, applications to provide additional dwellings within private residential gardens on sites not allocated for housing, there is no good reason to discount the historic contribution from this source, *i.e.*, the historic contribution from small sites should be treated as 20, not 18, dwellings *per annum*.

1.7 With an increased annual small sites allowance of 25 and the additional dwellings identified from committed sites and town centre regeneration, Table 2 would be further amended as follows:

Source of Supply	Years 1-5	Years 6-10	Years 11-15	Total
Remaining dwellings on allocated sites	1367	1112	217	2696
Remaining dwellings on other committed sites	268	100	87	455
Sub Total	1635	1212	304	3151
Small Site Allowance	50	125	125	300
Other dwellings on committed sites - paragraphs 1.3 and 1.4	21	-	-	21
Town Centre Regeneration	75	75		150
Total	1781	1412	429	3622

1.8 In addition to the dwellings added to Table 2, we have identified sites for another 918 dwellings (our document ECNF-HLA 2), some of which are the subject of representations by their owners and the rest of which have been considered by a local planning consultant to be suitable.

1.9 We calculate that over 400 dwellings could be provided on some of the surplus employment land (our document ECNF-ELR 6).

1.10 These figures exclude any contribution from empty homes and large windfall sites.

1.11 This demonstrates that there is an ample supply of housing land and that there is no justification for recourse to the Green Belt.

1.12 We believe that Green Belt should be released for development only in exceptional circumstances and that for site H72 RBC have failed to provide any evidence justifying such release. If it were determined that exceptional circumstances do exist, it would be essential to

conduct a thorough assessment of the relative merits of all potential development sites in the Green Belt before any one of them could be released. Unless that were done, any allocation of Green Belt land would be unsound.

1.13 We do not intend to rehearse here all the other factors that make site H72 unsuitable for development. They are numerous, including landscape, heritage and the setting of a Grade II* listed building, local highways infrastructure, site access, road safety issues around the enlargement of Edenfield CEPS in its present location, and building, without respect to natural valley contours, on an artificial mound consisting of laminated clay tipped on laminated clay.

2. Table 3 on Pages 6 to 12: Updated Housing Trajectory October 2019

2.1 Although described as 'Updated', this Trajectory has been stripped of some of the detail in its predecessor, document EL1.002j(iii). For example, the Comments column has unhelpfully been deleted, not updated. In column 4 in the new document some but not all planning permissions are described as outline or RM. It would be clearer if this were done consistently. The Trajectory needs to identify all relevant planning permissions by reference number.

2.2 It is noted that RBC have shaded many altered cells, but that they have not shaded cells where the figure has been altered to 0.

2.3 The following corrections are required:

H12 Estimated yield should be 110, not 97 (see paragraph 1.1 above);

H39 Insert revised net developable area;

H50 Criccieth, not Cricceth;

H59 (i) Estimated delivery column needs to show delivery extending beyond Years 1-5.

(ii) Whilst it was agreed that a realistic estimated yield is 95, rather than 100, the fact remains that there is outline permission for up to 100 dwellings, and therefore the number of dwellings with permission remaining is 100. The penultimate column should be amended and any discrepancy explained by a footnote.

H60 Estimated delivery column needs to show delivery extending beyond Years 1-5;

H68 Now has planning permission - issued 27th September 2019.

H72 This perpetuates the error that H72 includes the Horse & Jockey site. Therefore:

(i) The area should be corrected to 13.53 ha from 13.74ha;

(ii) The figure 5 should be replaced by 0, in two columns;

(iii) The last two cells should state 0 and 400 respectively.

2.4 There remains a strong possibility that land adjacent to the H1 and H60 allocations will be the subject of planning applications for a substantial number of dwellings while the Local Plan is still being considered.

2.5 The new Trajectory shows only allocated sites. Other committed sites, formerly in the Trajectory (document EL1.002j(iii)), are now listed in a separate Table, in Appendix 1.

2. Appendix 1, Table 1 on Pages 13 to 23: Other committed [housing] sites (as of 01/04/19)

2.1 Column 3 has no heading but says 'Yes' against each site.

2.2 The asterisk against 2014/0297 (third entry on page 14) is not explained.

2.3 Some columns in the previous document, EL1.002j(iii), are omitted here. In particular, the new document no longer states the total number of dwellings granted permission. This omission makes the document harder to verify.

2.4 As noted at paragraph 1.3 above, the Table is incomplete and therefore unreliable.

2.5 The absence of any obvious order in the entries makes the Table unclear and difficult to verify.

Richard W. Lester and Alan G. Ashworth

28th October 2019