

Rossendale Local Plan Examination

Matter 19 Housing Land Supply Update

Hollins Strategic Land

October 2019

1 Matter 19 – Housing Land Supply Update Report

1.1 Hollins Strategic Land participated in the Matter 19 Hearing Session and welcomes the opportunity to raise additional points following further study of document EL4.014. As requested, this Representation does not seek to rehearse topics debated in the hearing session. Rather, it relates to the Council's reliance on:

- Sites that don't benefit from developer support;
- Council-owned sites; and
- Sites in east Rossendale.

Reliance on sites without developer support

1.2 HSL attended/participated in a number of the Matter sessions. From experience, HSL considers that the sessions were not well attended by developers; most sessions were predominantly attended by representatives of the developers/residents group involved in the Edenfield Green Belt release site.

1.3 It is acknowledged that a lack of developer participation during Hearing sessions does not mean that sites are not developer backed. However, it is also understood that written representations were not made by developers for a number of sites.

1.4 Having attended the Hearing sessions, it is evident that the emerging Local Plan is overly reliant upon sites that do not have developer support. Given the level of reliance, it is considered that the Council should confirm what percentage of its overall housing requirement is dependent on sites that do not have developer support.

1.5 The lack of developer support is not a new issue in Rossendale. The Council has not had a deliverable housing land supply for some time, yet there have been few developers who have sought permission on greenfield sites, as you would usually expect. Major developers have not been attracted to Rossendale. It is dominated by low market areas with pockets of higher value locations and also suffers from a lack of sites without levels issues. However, as HSL has found, there can be significant developer interest if sites in higher value/stronger market locations can be identified, such as the site off Burnley Road, Loveclough.

1.6 HSL made use of the Council's evidence base on market value areas when acquiring the land off Burnley Road, Loveclough. It is considered that this evidence should be expanded upon to demonstrate what percentage of the Council's supply is in low market areas and to enable the Local Plan to allocate alternative/omission greenfield

sites in higher value/stronger market areas, which are more likely to receive developer support and be deliverable.

Reliance on sites in east Rossendale

- 1.7 During the Hearing sessions, it became apparent that the Council's deliverable and developable housing land supply is heavily reliant upon sites in east Rossendale which are Council owned and/or do not have developer support.
- 1.8 During the Hearings, HSL confirmed that it was interested in site H40 despite it being in a low market area but there are a number of issues to be overcome which render it undeliverable at this point in time. Site H40 benefits from an attractive entrance, an elevated position with views over the valley and easy vehicular access to Todmorden. The same cannot be said of all sites in Bacup, which has not been particularly popular with developers because of the low market values. Yet, according to EL4.014, the emerging Local Plan will rely on Bacup to deliver 244 homes in the middle of the Local Plan period. This is in addition to significantly more housing elsewhere in lower market areas in East Rossendale.
- 1.9 If the Council does want to rely so heavily on East Rossendale, it should provide evidence that the anticipated level of growth can be sustained (and deliver the required amount of affordable housing given potential viability issues). Otherwise, housing should be redistributed across Rossendale to ensure that there is a greater balance with a higher proportion of housing in stronger market areas.

Reliance on Council-owned sites

- 1.10 During the Hearing sessions, it also became apparent that the Council's deliverable and developable housing land supply is heavily reliant upon Council-owned sites. From experience, HSL considers that Rossendale is more reliant on Council-owned sites than the majority of Councils in the North West. Furthermore, a large proportion of the Council-owned sites do not as yet have developer support and some are used as public open space.
- 1.11 In order for the plan to be found sound, the Council must provide evidence to demonstrate that these sites are deliverable/developable. Given the heavy reliance on Council-owned sites, it is considered that the Council should confirm exactly what percentage of its overall housing requirement is dependent on Council-owned sites and provide the Inspectors with details on how/when sites will be marketed and indeed, if they have been marketed to date with/without success.

Conclusions

- 1.12 The Hearings have demonstrated that the Council has had to make significant changes to its housing trajectory. Document EL1.014 states that these changes have not resulted in the Council being unable to demonstrate a deliverable housing land supply or meet the overall plan requirement. However, the Council has acknowledged that it must undertake significant additional work, as requested by the Inspectors, in order to demonstrate that EL1.014 is reasonable¹. It appears likely that this work will result in further changes to the housing trajectory.
- 1.13 HSL considers that the Hearings have also demonstrated the Council's reliance on council-owned sites, low market value areas in East Rossendale and sites without developer support. This has the potential to prevent the provision of a deliverable housing land supply as well as the delivery of the overall housing requirement for the plan period.
- 1.14 It is considered necessary that the Council undertakes further work to attempt to justify this reliance or, preferably, rebalances housing provision to provide a greater number of sites in higher value/strong market areas such as Loveclough, on sites that benefit from developer support. This would achieve a more balanced, deliverable housing supply.

¹ HSL would welcome the opportunity to comment on the additional work being undertaken by the Council