

Subject:	Adoption of the Affordable Housing Supplementary Planning Document (SPD)	Status:	For Publication
Report to:	Cabinet	Date:	20 November 2024
Report of:	Head of Planning	Lead Member:	Planning
Key Decision:	<input checked="" type="checkbox"/> Forward Plan <input checked="" type="checkbox"/>	General Exception <input type="checkbox"/>	Special Urgency <input type="checkbox"/>
Equality Impact Assessment:	Required: Yes	Attached:	Yes
Biodiversity Impact Assessment:	Required: No	Attached:	No
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1. RECOMMENDATIONS

- 1.1. To approve the Affordable Housing Supplementary Planning Document (SPD) for use for Development Control purposes
- 1.2. Minor amendments to the Affordable Housing SPD, including formatting changes, and updates to the household income and price caps, in line with data produced by the Office for National Statistics (ONS), to be delegated to the Head of Planning and Lead Member prior to consultation.

2. EXECUTIVE SUMMARY

- Rossendale Borough Council adopted its Local Plan in December 2021. This contains policy HS3 to ensure the delivery of appropriate Affordable Housing within the borough.
- Policy HS3 of the adopted Local Plan commits the Council to preparing an SPD to provide further details and guidance on Affordable Housing, specifically in relation to different affordability tenures.
- Detail is provided in this SPD about Eligibility Criteria, Local Connection Tests and Affordable Home Ownership tenure Price Caps.
- This SPD has been consulted on with stakeholders prior to adoption as required by the relevant Regulations. In total 8 responses were received, with 3 recommending modifications or raising matters for consideration.
- It should be noted that the Government is proposing a number of changes to the National Planning Policy Framework (NPPF), including some which relate to housing, but which are not expected to affect this SPD.

3. BACKGROUND

- 3.1. As part of the preparation of the Local Plan the Council commissioned Lichfields to conduct a Strategic Housing Market Assessment (SHMA) in 2016, with an update provided in 2019. The SHMA shaped the Local Plan policies on Affordable Housing requirements and tenures and identified a “significant affordable housing need in Rossendale”.
- 3.2. A specific need for Social / Affordable rental properties was identified by this study (with 70% of all Affordable Housing needs being for rental properties), hence Policy HS3 of the Local Plan seeks a higher rate of Social / Affordable rent tenures than Affordable Home Ownership. As such the Policy requires at least 20% of dwellings on new housing developments to be for social / affordable rent and, in line with current national policy, at least 10% of all dwellings to be built should be made available for Affordable Home Ownership.

3.3. This SPD is intended to provide further detail to accompany and support the implementation of Policy HS3: Affordable Housing of the Rossendale Local Plan 2019 to 2036. It provides the framework for the provision of Affordable Housing on new residential developments which is specific for Rossendale, for example, using a local figure rather than the default national figure on maximum affordable sales caps.

3.4. The SPD was taken to the Council's Overview and Scrutiny Committee on 9 September, which approved the document for a 4-week consultation period and recommended adoption by Cabinet following this consultation exercise.

4. DETAILS

4.1. This SPD provides further detail to accompany and support the implementation of Policy HS3 of the adopted Local Plan. This detail should provide greater clarity to developers, Planning Agents, Planning Officers and the public as to what quantity and tenure type of Affordable Housing would be appropriate on a potential residential development site.

4.2. The SPD states Social and Affordable Rent dwellings should be the Council's preferred form of long-term affordable housing provision, in line with Policy HS3 of the Local Plan which requires two thirds of the total Affordable Dwellings on-site to be Social or Affordable Rent. The other third of on-site Affordable Dwellings should be for Affordable Home Ownership.

4.3. Government policy introduced by the previous administration sets maximum caps on household income (£80,000) and house price (£250,000) for certain types of Affordable Home Ownership. These significantly exceed median household incomes (£42,007.50 using the calculation found within Appendix 2) and median house prices (£170,000 in Sep. 2023) in Rossendale. It is considered that reducing these figures is appropriate for discount market housing schemes to allow more people in affordable housing need in Rossendale to benefit.

4.4. The SPD sets out price caps to be applied to Discount Market Value homes. These price caps will be the maximum that these forms of affordable homes can be sold for, calculated using Office for National Statistics data¹ on median household incomes for Rossendale for 2023. The price cap will stand at £186,700 and the Affordable Home Ownership dwellings will only be available to those on a combined annual household income of no more than £56,010. These price caps are a reduction from the nationally set default price cap and give a more attainable maximum sale price for those seeking affordable homes in Rossendale.

4.5. Details about the Eligibility Criteria for the different affordable housing tenures are covered in this SPD. The Eligibility Criteria for a specific tenure of Affordable Housing must be met by any applicant for that dwelling to be considered eligible. This criteria will be used in drafting any s106 agreement involving the on-site delivery of Affordable Housing. Eligibility Criteria may consist of the following: applicants being in Housing Need for the applied for dwelling; falling within the annual combined household income restriction; and passing any Local Connection Test. The Eligibility Criteria can be seen in Appendix 1 of the SPD. The SPD allows for open sale, if the property has not been sold within a specified period of time.

4.6. The SPD also details how proposals for off-site Affordable Housing contributions will be considered. It sets out the process to be followed and any element of uplift that will need to be applied to any commuted sum payments to ensure a satisfactory amount of Affordable Housing contribution is achieved, taking account of factors specific to off-site payments.

¹ [House price to workplace-based earnings ratio](#) (March 2024)

- 4.7. Further guidance and legislation may be issued that may have a bearing, e.g. secondary legislation associated with the Levelling Up and Regeneration Act (2003). The Government has issued proposed changes to the NPPF, which include revising the standard method to calculate the housing requirement, and introducing 'grey belt' (brownfield land in the Green Belt and other parcels/areas that make a limited contribution to the Green Belt purposes).
- 4.8. Other changes being mooted may affect the delivery of affordable housing. In its consultation, the Government notes it wishes to boost housing that is available for social rent and expects local authorities will prioritise this tenure in line with local needs. Also, whilst acknowledging that home ownership should be boosted, the Government considers that the current system for 10% of all major housing schemes to be for affordable home ownership is too prescriptive. The consultation on the NPPF notes that First Homes should remain a type of affordable housing, but it proposes to remove the current requirement for at least 25% of all affordable housing units to be First Homes. The references to Starter Homes have been removed. The NPPF update is expected to be published late 2024/early 2025.
- 4.9. The draft Affordable Housing SPD was consulted internally (Planning, Legal, Housing, Economic Development) and with Homes England and Council's Viability Consultant. In the light of the proposed changes to the NPPF references First Homes have been removed.
- 4.10. The SPD was taken to the Council's Overview and Scrutiny Committee on 9 September which approved the statutory consultation, and recommended the final version to be considered for adoption by Cabinet following this consultation. The consultation was carried out 24 September to 22 October 2024. The SPD included a number of questions aligned with an online survey, to direct consultees' attention to key issues. In total 8 responses were received, of which 3 recommend modifications or raise matters for consideration, see below:

Consultee	Summary of Response	Action
National Highways	No specific comments	No
Natural England	No specific comments	No
The Coal Authority	No specific comments	No
Historic England	No specific comments	
RBC Strategic Housing	Q1 - Support for uplift methodology. Q5 - Support for Local Connection Test. Q7 - Agree with Price Cap methodology. Q8 - Strategic Housing have been involved with the drafting of the SPD	No
Growth Lancashire	Q8 - A number of assets in Rossendale are NDHAs and this should be taken into consideration regarding any conversion works	Noted
Ian Francis	Query about duplicated paragraph	Remove paragraph 4.3
NHS Property Services	Request consideration be given to AH for NHS staff	It is considered that NHS staff are provided for within the SPD due to the "essential local workers" (as defined in the NPPF) inclusion in para 2.1.2

- 4.11 As a result of the comments received the duplicated paragraph will be removed. We consider NHS Property Service's concerns are addressed in the SPD. We note Growth Lancashire's comments and consider residential conversions to be better considered elsewhere.

4.12 It should be noted that CPRE responded on 24 October, after the consultation ended. Their response has been included in the Consultation Statement. We note their concerns (e.g. on consultation, incorporating policies to address climate and sustainable development in relation to affordable housing, “its narrow focus on housing” so omitting biodiversity, beauty and heritage, and health and well-being and accessibility matters. As before we consider these issues to be better referenced in other specific policies and guidance.

5. RISK

5.1. This SPD is intended to help developers comply with local policy in the adopted Local Plan when providing affordable housing. It provides additional details and guidance on how to address local and national policy requirements; not having this SPD in place may result in the Council not delivering an appropriate level/form of Affordable Housing for Rossendale.

5.2. This SPD is open to challenge in the period immediately post adoption by the Council. Planning decisions that are made using this policy as a reason for refusal can be appealed and this SPD could be scrutinised by Planning Inspectors. Nevertheless, the risk associated is minimal and outweighed by the need to issue further guidance.

6. FINANCE

6.1 Approving the recommendations in this report does not create any additional financial implications for the Council. Amending the process to calculate affordable housing commuted sum payments will help to secure higher financial contributions to assist the Council deliver affordable housing.

7. LEGAL

7.1 Legal implications are covered in the body of the report. Statutory consultation will be required for a period of at least four weeks prior to adoption of the Supplementary Planning Document.

8. POLICY AND EQUALITIES IMPLICATIONS

8.1 No policy implications.

8.2 An Equality Impact Assessment has been undertaken. This shows no adverse impacts.

8.3 A public consultation has been undertaken.

8.4 Any equality implications related to this report will be given consideration in a relevant and proportionate manner.

9. REASON FOR DECISION

9.1. Adopting the Affordable Housing SPD will enable the Council to ensure that new major residential developments that require planning permission will deliver an appropriate level and type of Affordable Housing that is appropriate to Rossendale.

Background Papers			
Document	Place of Inspection		
Affordable Housing SPD (October 2024)	Attached		
Draft Affordable Housing SPD (March 2024)	Supplementary Planning Documents (SPDs), Masterplans and other guidance Rossendale Borough Council		
Comments Received on Draft Affordable Housing SPD	Attached		
Equalities Impact Assessment	Attached		
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Proposed reforms to the National Planning Policy Framework (July 2024)	Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk)
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ROSSENDALE
BOROUGH
COUNCIL



AFFORDABLE HOUSING

Supplementary Planning Document (SPD)
November 2024



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AFFORDABLE HOUSING

Supplementary Planning Document (SPD)

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Affordable Housing

1. Introduction

- 1.1 Rossendale Borough Council is committed to delivering a wide range of housing, including affordable housing, to meet identified need. The Council's Strategic Housing Market Assessment (SHMA) 2016 and subsequent update in 2019 demonstrate that there is a considerable demand for affordable housing in Rossendale and that the issue must be addressed to prevent the problem from worsening. There is a particular need to provide for the growing elderly population as well as those with disabilities.
- 1.2 Affordable Dwellings should meet the requirements of those deemed in need of affordable housing, including a house price / rent set at an achievable level within the context of Rossendale.
- 1.3 This Affordable Housing Supplementary Planning Document (SPD) is intended to provide further detail to accompany and support the implementation of Policy HS3: Affordable Housing of the Rossendale Local Plan 2019 to 2036.
- 1.4 This document is a material planning consideration in the determination of planning applications and it should be utilised by potential applicants when proposing new residential developments of 10 or more dwellings (0.5 hectares or part thereof).



2. Context

2.1 National Policy Framework

- 2.1.1 The delivery of affordable housing is a key objective of the National Planning Policy Framework (December 2023) (NPPF). The NPPF states that where a need for affordable housing has been identified, '...planning policies should specify the type of affordable housing required, and expect it to be met on site...' (1). This is what Policy HS3 aims to achieve, and this SPD will facilitate the implementation of said policy.
- 2.1.2 The Council uses the Government's own definitions of Affordable Housing as set out in the NPPF, which defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions":

(1) NPPF December 2023 - Paragraph 64

2.1.3 Affordable Housing for Rent

“Affordable housing for rent meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (5) (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).”

2.1.4 Starter Homes

“Starter homes is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.”

2.1.5 Discounted Market Sales Housing

“Discounted market sales housing is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.”

2.1.6 Other affordable routes to home ownership

“Other affordable routes to home ownership is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.”

2.2 Rossendale Local Plan 2019 - 2036

2.2.1 Within the Rossendale Local Plan 2019 to 2036 (herein referred to as “Local Plan”), a requirement of 30% onsite affordable housing will be sought by the Council on applicable market housing schemes, subject to site and development considerations, such as financial viability.

2.2.2 Of the total number of homes to be provided, at least 10% should be available for affordable home ownership as part of the overall affordable housing requirement. This is the case apart from when the proposal provides solely for Build to Rent, specialist accommodation to meet specific needs, is self-build, or is exclusively for affordable housing, entry level exception sites or rural exception sites.

2.2.3 The remaining Affordable Dwellings (20% of the total number of dwellings on-site) must be of an affordable rental tenure, with the Council having a specific preference for either Social or Affordable rent.

2.2.4 Despite the high need for affordable housing in Rossendale, the SHMA recognises that there is a need to balance the delivery of affordable housing against viability of delivery. The requirement in terms of tenure will be based on the housing need at the time of submission of the planning application. Further details will be provided within this Supplementary Planning Document.

Affordable Housing

2.3 Strategic Housing Market Assessment (SHMA)

- 2.3.1 As part of the examination of the Local Plan the Council commissioned Lichfields to conduct a SHMA in 2016, with an update produced in 2019. This SHMA shaped the Local Plan policies on Affordable Housing requirements and tenures and identified a “significant affordable housing need in Rossendale”.
- 2.3.2 A specific need for Social / Affordable rental properties was identified (70% of Affordable Housing needs), hence why Policy HS3 of the Local Plan seeks a higher rate of Social / Affordable rent tenures than Affordable Home Ownership.

2.4 Housing Strategy

- 2.4.1 The primary aim of the Housing Strategy is to strengthen the housing framework in the Rossendale Borough. The strategy outlines how the Council is to get the best out of its resources and build on existing relationships, both internally and with partners. This will drive forward improvements in Rossendale’s housing market, and ultimately boost the options available to residents within the borough.

3. Affordable Housing provision in Rossendale

- 3.1 As illustrated above, Policy HS3 of the Local Plan sets out when Affordable Housing is required as part of new housing developments of 10 or more dwellings (0.5 ha or part thereof).
- 3.2 In an instance where the calculation of Affordable Housing provision results in a non-whole number the Council will always round-up the number and seek this number of Affordable Dwellings e.g. 30% of 21 homes is 6.3 homes, this should be rounded-up to 7 homes and this is what the Council will seek. In this example, if the Council were to round-down to 6 homes then Policy HS3 would not be satisfied and the onus would fall upon the applicant to demonstrate why rounding-up would not be feasible.
- 3.3 The majority of Affordable Housing in Rossendale is delivered via Planning Obligations as set out in section 106 of the Town and Country Planning Act (1990) (as amended), known as “s106 agreements”. s106 agreements allow the Council greater control and security in regard to the stable delivery of Affordable Housing.

4. When on-site provision cannot be provided

- 4.1 Policy HS3 of the Local Plan states that “In exceptional circumstances, off-site provision or financial contributions of a broadly equivalent value instead of on-site provision, will be acceptable where the site or location is unsustainable for affordable housing”.
- 4.2 Where it is agreed between the Applicant and the Council that on-site provision of Affordable Housing cannot be realistically achieved then the Council will seek appropriate off-site provision / contributions to deliver Affordable Housing elsewhere. It should be noted that this approach will only be taken in exceptional circumstances where robust evidence is provided to demonstrate that on-site Affordable Housing provision is not possible. The Council will expect the applicant to evidence this and cover any reasonable costs incurred by the Council in scrutinising any such evidence.

Affordable Housing

- 4.3 If it is satisfactorily evidenced that the development cannot realistically deliver Affordable Housing then the Council will require that an Overage Clause is entered into with the Council expecting that any reasonable costs incurred in the preparation of this to be covered by the applicant. This will be decided on a case by case basis.
- 4.4 Where it is agreed that an off-site provision / contribution is acceptable, the methodology on the next page should be followed in order to calculate the level of appropriate contributions, including uplift:

1

The Council, in liaison with the developer, will determine what proportion of the different house types would be required to be affordable if the Council's affordable housing policy were to be met on-site. The key consideration will be meeting the overall provision of affordable units and the tenure split as set out in section 2(ii) above.

2

The applicant must provide details of the Open Market Value (OMV) of the identified affordable homes. This should be based on local evidence of similar schemes and be supported by a valuation prepared by a RICS Registered Valuer.

3

The applicant must submit evidence in the form of written communication from a Registered Provider (RP) active in Rossendale which sets out how much the RP would be prepared to pay for the Affordable Dwellings on the basis that they remain affordable in perpetuity. The applicant should calculate the 'cost to developer' if the Affordable Dwellings were to be provided on site. The cost should be equivalent to the difference between the OMV and the price that the RP would be prepared to pay. e.g. if a house is worth £200,000 on the OMV and a RP would purchase the property for £120,000 then the 'cost to developer' would be £80,000. In the absence of submitted evidence that has been endorsed by the RPs the Council will use its own evidence to determine the 'cost to developer'. This evidence is likely to be based on recent transactions across Rossendale.

4

Once the total 'cost to developer' is calculated for the scheme the Council will include uplift (see following) to the financial contribution to reflect the fact that if the affordable homes are provided off-site, the number of market homes on site increases.

Uplift

In calculating the uplift the Council will apply the following assumptions: **Total Scheme [TS] = Market Homes [MH] + Affordable Homes [AH].** $MH = 0.7 \times TS$.

In a scheme where the Affordable Housing is provided on-site then TS is the known factor. E.g. in a scheme with 100 dwellings the following split between MH & AH will be required:

Total Dwellings = 100, No. of MH = 70 (0.7 (70%) of TS), No. of AH = 30 (0.3 (30%) of TS)

However, if the AH are to be provided off-site and the application site is wholly MH then the TS increases. Here the number of MH is the known factor. The formula: $MH = 0.7 \times TS$ is re-written as $TS = MH / 0.7$.

Therefore, in the same scheme as above the total scheme will increase as follows: **No. of MH = 100, Total Dwellings = 143 (100 / 0.7).** As we know: $TS = MH + AH$.

The number of Affordable Homes [AH] will therefore be the equivalent of 43 units (i.e. 30% of the total scheme). The financial contribution for off-site affordable housing will have to reflect this. This uplift calculation can be varied dependent on the number of Affordable Homes on site. If the applicant determines that the final financial contribution would make the scheme unviable they must demonstrate this via a viability statement to the satisfaction of the Local Planning Authority.

5. Affordable Housing for Rossendale

5.1 This section will provide more detail on the different types of Affordable Housing outlined in the NPPF and Planning Practice Guidance (PPG), how each will function within Rossendale and what the Council will seek when determining Planning Applications.

5.2 There are three main forms of Affordable Housing; Affordable Rental (including Social Rent & Affordable Rent), Affordable Home Ownership (including First Homes & Discount Market Value) and Intermediate Affordable Housing (including Shared Ownership).

5.3 Social Rent

5.3.1 Social Rent housing is owned and managed by Affordable Housing Providers and is for eligible households whose needs are not met by the open market, for which guideline target rents are determined through the national rent regime.

5.3.2 The Council is in partnership with B-with-us, this is Pennine Lancashire's method of allocating housing association properties for rent. More information on B-with-us, including how to use the service, can be found here: www.b-with-us.com.

5.3.3 Provision will be made, via s106 agreements, to ensure that Social Rent housing will remain as such in perpetuity. s106 agreements will also ensure the dwelling is available only for eligible persons as outlined above and that the property cannot be offered for sub-letting. Eligibility criteria for Social Rent dwellings can be found in [Appendix One](#).

5.3.4 The 2019 SHMA also identified a need within the Social Rented sector for wheelchair accessible homes (meeting Optional Standards M4(3) of the Building Regulations). Applicants will be encouraged to meet these standards on-site subject to site and development considerations.

5.3.5 Social and Affordable Rent dwellings are the Council's preferred form of Affordable Rental dwellings due to a specific need for these tenures (as demonstrated in the SHMA), their ability to provide long-term Affordable Housing provision, and the regulation that national government provides in terms of Registered Providers.

5.3.6 Government's policy statement on rents for social housing can be found [here](#).



5.4 Affordable Rent

- 5.4.1 Affordable Rented housing is owned and managed by Affordable Housing Providers and is for eligible households whose needs are not met by the open market. Affordable Rents must not exceed 80% of the local market rent, inclusive of service charges and must not exceed the Local Housing Allowance (LHA) for the relevant property type in the relevant location. This is to ensure that in high value areas the affordable homes can still be affordable to those on lower incomes and who may require financial assistance towards meeting the cost of their rent.
- 5.4.2 Affordable Rented housing should remain as such in perpetuity and this will be secured via s106 agreements.
- 5.4.3 Social and Affordable Rent dwellings are the Council's preferred form of Affordable Rental dwellings due to a specific need for these tenures (as demonstrated in the SHMA), their ability to provide long-term Affordable Housing provision, and the regulation that national government provides in terms of Registered Providers.

5.5 Build to Rent and Affordable Private Rent

- 5.5.1 Build to Rent schemes generally consist of 100% purpose built housing for rent. The NPPF states that Affordable Housing on such schemes should be provided by default in the form of Affordable Private Rent, a form of Affordable Housing which has been designed specifically for Build to Rent schemes. Both Affordable Private Rent and private market rent dwellings should be managed by a single Build to Rent landlord, this does not need to be a Registered Provider.
- 5.5.2 The PPG states that national affordable housing policy requires a minimum rent discount of 20% for Affordable Private Rent dwellings relative to local market rents. This discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development.
- 5.5.3 Eligibility for occupying affordable private rented homes will be agreed between the Council and the scheme operator on a case by case basis.
- 5.5.4 The 2019 Strategic Housing Market Assessment stated that in Rossendale, it is likely that Build to Rent schemes could cater for needs in the private rented sector, particularly for those on low to middle incomes who may desire an alternative to traditional rental options. Research conducted as part of the 2019 SHMA concluded that there is expected to be a very modest growth in the number of young single person households (+339) and also the number of households with children (+347); suggesting that any Build to Rent schemes in Rossendale should be modest in scale, and should be split broadly equally between meeting the needs of families (i.e. larger housing) and also smaller housing suited to single person households.
- 5.5.5 However, as stated in the 2016 SHMA, Research published by EC Harris in November 2013 (Build to Rent – Pushing the Boundaries) identified Rossendale as an area whereby build to rent was not viable, even if delivery costs and unit sizes were reduced.
- 5.5.6 Social and Affordable Rent dwellings are preferred by the Council due to these tenures providing long-term Affordable Housing provision, and regulation that national government provides in terms of Registered Providers, something that Affordable Private Rent may not achieve. This, coupled with the identified un-viability of Build to Rent schemes within Rossendale, mean the Council will not actively pursue Build to Rent or Affordable Private Rent as an Affordable Housing tenure.

5.6 Starter Homes

- 5.6.1 Sections 2 & 3 of the **Housing and Planning Act 2016** specify what constitutes a Starter Home and reference to this is made within the NPPF.
- 5.6.2 However, the secondary legislation as mentioned within the NPPF has not been published and the Government no longer has a dedicated budget for the delivery of Starter Homes. As such, this form of Affordable Housing will not be actively pursued by the Council.
- 5.6.3 Given the lack of further guidance on Starter Homes and the more recent Ministerial Statement by the Government on First Homes, we consider the delivery of First Homes of a greater priority.

5.7 Discounted Market Sales Housing

- 5.7.1 As defined in the NPPF, Discounted Market Sales Housing, also known as Discount Market Value (DMV), are dwellings sold at a discount which is at least 20% below the identified local market value of that property agreed with the Council. Eligibility for this form of housing in Rossendale is determined with regard to local house prices, incomes, a local connection test and the suitability of the property based on the number of bedrooms and household size. Further information regarding the eligibility criteria for DMV homes can be found in **Appendix One**.
- 5.7.2 Provision will be made, via s106 agreements, to ensure that the dwelling remains at a discounted level for eligible persons in perpetuity. Additionally, via s106 agreements, the Council will seek to make sure that DMV Homes are the sole residence of any potential purchaser and are not offered for lease in the future.
- 5.7.3 DMV homes will only be available to purchasers with an annual combined household income of, at the most, £56,010. This is calculated using the median earning for Rossendale (2) and multiplying by 2 to arrive at a likely maximum household income for median earners. Further information regarding the eligibility criteria for Discount Market Value homes can be found in **Appendix One**.
- 5.7.4 DMV homes can also have a sale price cap lower than the national figure of £250,000. The house price cap for Rossendale is explained below. (2)
- 5.7.5 **DMV Price Cap**
A cap on the sale price of Discount Market Sales housing will be applied. Rossendale Borough Council will therefore set a cap on the price of a DMV dwelling lower than the national figure. This will be set to ensure that the sale price (with discount applied) is in reach of a typical household with median earnings in the Borough, as considered above. The cap is therefore set at £174,669 (for 2023-24), the amount (based on 2022 data) that the example median household could raise.
- 5.7.6 This level of discount and Affordable Housing tenure will be secured via a s106 agreement, as will ensuring that the discount remains in perpetuity.

(2) Data taken from the Office for National Statistics "House price to workplace based earnings ratio" dataset published in March 2024.

Affordable Housing

- 5.7.7 When someone wishes to sell a DMV house they must inform the Council and confirm the date they intend to begin marketing the property. The vendor is responsible for obtaining a market valuation of the property which will be used by the Council as the basis for the discounted sale calculation.
- 5.7.8 It is the responsibility of the vendor to market the property and ensure that the buyer they agree to sell with is one deemed eligible to purchase the property by the Council. We therefore encourage prompt application to avoid delays and unnecessary complications.
- 5.7.9 Anyone who inherits a DMV property should inform the Council of the new ownership.

5.8 Rent to Buy

- 5.8.1 Rent to Buy is an affordable route to home ownership mentioned within the NPPF, acting as a form of intermediate rent. Under this scheme, tenants are helped to save for a deposit by offering dwellings at a discount, usually 20% below market rent. More information can be found at: www.gov.uk/rent-to-buy.
- 5.8.2 In order to be eligible for Rent to Buy applicants must be:
- in full or part time employment;
 - a first-time buyer (3); and
 - able to pay rent & save for a house deposit simultaneously.
- 5.8.3 Applicants can apply to rent a dwelling under this scheme, and if deemed eligible, the dwelling may be offered to the applicant. The initial tenancy will be for up to 2 years, however, if more time is required to save for a house deposit then the landlord may agree to extend the tenancy. Applicants can buy a dwelling, including those under an Affordable Home Ownership scheme, as soon as an adequate house deposit has been saved and a mortgage can be secured.
- 5.8.4 The Council does not have a preference for Rent to Buy and will not actively pursue such schemes over other affordable rent options, specifically Social and Affordable Rent. However, anyone interested in the scheme can still search for relevant dwellings here: [Search for a Rent to Buy home in the north](#).

5.9 Shared Ownership

- 5.9.1 Shared Ownership is a form of Intermediate Housing which allows people who cannot afford all of a house deposit and mortgage payment for a dwelling which meets their needs to buy said dwelling.
- 5.9.2 A share (between 10% & 75%) of a dwelling is bought by a prospective purchaser and rent is also paid to a landlord on the remaining shares. A deposit (usually 5 - 10%) is also needed for the share being purchased.
- 5.9.3 The Council will consider this form of intermediate housing when making up the affordable housing make-up of a scheme as Intermediate Housing is not only a way of assisting in meeting affordable housing needs, it is also an effective way of helping people who are able to afford private market rent but cannot afford a dwelling to meet their needs get on the housing ladder.
- 5.9.4 More information regarding Shared Ownership is contained on the Government website: www.gov.uk/shared-ownership-scheme.

(3) Applicants may be eligible for Rent to Buy if returning to home ownership following a relationship breakdown.

5.10 Rural Affordable Housing

5.10.1 PPG stresses the importance of housing supply and affordability issues in rural areas, and the SHMA highlights that a strong demand exists for rural housing within the borough. Local Plan Policy HS11: Rural Affordable Housing – Rural Exception Sites aims to satisfy these demands by allowing a limited number of dwellings that exclusively meet local needs for affordable housing adjoining the built form of existing settlements. So long as; a) there is no suitable site available within the Urban Boundary, and b) the scale and nature of the development would be in character with the existing settlement.

5.11 Specialist Housing/Older Persons Housing

5.11.1 There is an identified need for specialist supported housing in Rossendale, including a strong demand for housing for older people and those with mental health needs. The SHMA identified that the number of residents aged over 65 in Rossendale is projected to increase by 6,336 by 2034. Given the substantial projected increase in residents over 65, and the current insufficient supply of specialist housing for older people, it is a priority to increase the supply of good quality accommodation tailored specifically to this demographic. Policy HS5 of the Local Plan provides guidance on how to achieve appropriate housing standards and information on Optional Standards M4(2) of the Building Regulations. In line with Policy HS5, new housing developments of 5 or more dwellings will be required to provide at least 20% of dwellings which are specifically tailored to meet the needs of elderly or disabled residents, or be easily adaptable in line with the Optional Standards M4(2).

5.11.2 Local Plan Policy HS15: Specialist Housing seeks to address this issue by supporting proposals for specialist housing (including retirement, extra care and supported accommodation) provided that:

- The development is well located so that shops, public transport, community facilities and other infrastructure and services are accessible to those without a car, as appropriate to the needs and level of mobility of potential residents, as well as visitors and staff;
- The development contains appropriate external amenity space of an acceptable quantity and quality;
- Adequate provision is made for refuse and storage and disposal facilities;
- It would not have an unacceptable impact on the character of the area or the amenity of the occupiers of neighbouring properties; and
- The design and layout of the accommodation and its relation to its specific broader context fully meets the requirements of the residents of the specific type of accommodation proposed.



Affordable Housing

5.11.3 The Local Plan allocates three sites specifically for specialist accommodation:

- H19 – Former Bacup Health Centre
- H48 – Former Waterfoot Primary School
- H61 – Land behind Buxton Street, Whitworth

5.11.4 All three of the sites were built out as of 31st March 2022, collectively contributing 60 additional units to the existing stock of specialist accommodation in Rossendale.

5.12 Self-Build Housing

5.12.1 The Government is committed to increasing the supply of self-build and custom build homes. Evidence from the SHMA indicates that the level of demand for plots is low in Rossendale, and the Council's Self-build Register supports this evidence, with only 47 people being on the register as of the 31st March 2023.

5.12.2 Nevertheless, Local Plan Policy HS16: Self Build and Custom Built Homes is designed to support those who are interested in this form of housing. The Council will support said people by encouraging developers of schemes comprising 50 or more dwellings to make at least 10% of plots available for sale to small builders or individuals / groups who wish to custom build their own homes, where possible. This will be subject to the Council's self-build register and site viability.

5.12.3 Additionally, the Local Plan identifies three sites specifically for self-build and custom build housing:

- H5 – Land South of 1293 Burnley Road, Loveclough (5 dwellings)
- H53 – Land off Lea Bank (9 dwellings)
- H56 – Hareholme, Staghills (9 dwellings)

5.12.4 Self and custom-build housing can be delivered as Affordable Housing. Where this is possible the affordability parameters, occupancy and re-sale conditions will be controlled via a s106 agreement. Where on-site affordable housing is not feasible on an applicable self-build housing scheme then off-site provision/contribution will be sought.

6. Other

6.1 Other Applications

6.1.1 It will be necessary to agree in principle the delivery of Affordable Housing at the Outline Application stage, if applicable. This will then be applied to any Reserved Matters Application received.

6.2 Larger Homes (the 0.5 hectare rule)

6.2.1 Where a Planning Application is submitted for nine or fewer dwellings but is on a site which is 0.5 hectares, Policy HS3 still applies and a requirement of at least 30% affordable dwellings will be sought. Such sites may not viably be able to provide on-site affordable dwellings, as such, off-site provision or a monetary contribution may be acceptable.

Affordable Housing

6.2.2 It is advised that prior to Planning Applications being submitted for said developments the developer should engage in Pre-Application discussions with both the Local Planning Authority and the Strategic Housing Team. This would allow the early determination of what off-site provision or monetary contribution should be provided. This can be achieved by utilising the Local Planning Authority's Pre-Application Advice & Guidance service.

6.3 Vacant Building Credit

6.3.1 The Government's PPG provides an incentive for the development of brownfield sites which contain vacant buildings in the form of 'vacant building credits'. These credits can be applied to developments where a vacant building is brought back into lawful use, or is demolished in order to make way for a new building.

6.3.2 Where the development proposes an increase in the amount of overall floorspace, the Council will calculate the amount of affordable housing contributions required in line with the existing policy in the Local Plan. However, a Vacant Building Credit should then be applied which is equivalent to the gross amount of floorspace being brought back into use or created via a new building.

6.3.3 For example:

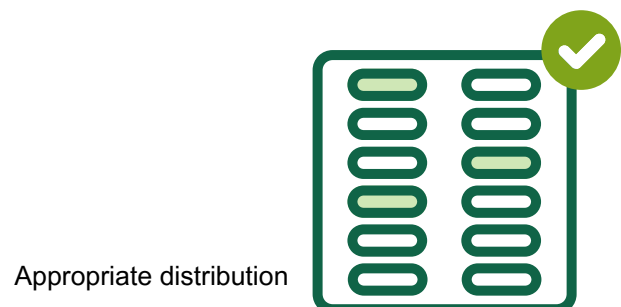
- A proposal is submitted to demolish a small vacant mill building which has a gross floorspace of 1000sqm and replace it with a new apartment building with a gross floorspace of 2000sqm and 40 apartments contained within.
- As the new gross floorspace is twice as much as the old gross floorspace, the affordable housing contribution should be half as much as what is asked for in the Local Plan after the Vacant Building Credit has been applied.
- This means that of the 40 apartments, the Council will only ask for an Affordable Housing contribution of 15%, equating to 6 affordable dwellings.

6.3.4 Vacant Building Credits do not apply where the building has been abandoned or been made vacant for the sole purpose of re-developing the site. Each proposal will be assessed on a case by case basis. In instances where buildings are demolished or removed on health and safety grounds it will be at the discretion of the Council whether or not to apply vacant building credit.

6.3.5 The Council's current policy is to protect and enhance existing employment sites. More information regarding this can be found in the Re-use and Re-development of Employment Land SPD.

6.4 Layout and Design

6.4.1 Policy HS3 of the Local Plan states that "Within larger housing developments, the affordable housing will be evenly distributed throughout the development". The concentration of all Affordable Dwellings in one section of a development will not be considered acceptable by the Council. Below is a simplified site layout demonstrating appropriate and inappropriate Affordable Dwelling distribution (purple representing the Affordable Units).



Appendix One - Eligibility Criteria

7.1 Detailed below is the eligibility criteria that applicants must meet to be able to fulfil in order to be considered for the type of affordable housing that they are applying for. These eligibility criteria should be used within the drafting of s106 agreements for applicable sites.

7.2 Social /Affordable Rent

7.2.1 An Approved Person must meet the following Eligibility Criteria for the Social / Affordable Rented Units:

- Applicants must be deemed to be in Housing Need;
- Applicants must be able to demonstrate a housing need for a property type;
- Applicants must have a local connection with the area in which they are seeking to live. For the avoidance of doubt please see the section below detailing the Local Connection Test for Social / Affordable Rented dwellings; and
- The Social / Affordable Rented Units must be the applicant's sole or principle home.
- Provided Always that notwithstanding the above the Council and Affordable Housing Provider may agree between themselves any amendment to the Eligibility Criteria where the Council shall deem it reasonable to do so and provided further that after such amendments are applied the applicant is able to demonstrate a housing need for a property type.
- Upon allocation of the Social / Affordable Rented Units for first lets and all subsequent lets the Affordable Housing Provider will confirm the details of each successful applicant detailing the criteria by which they qualify and the property address allocated to them and send this information to the Council.

7.3 Shared Ownership / Discount Market Value

7.3.1 In order to be eligible for Shared Ownership / Discount Market Value dwellings applicants must:

- Be deemed to be in need of financial assistance to purchase a property on the open market;
- Be able to demonstrate a housing need for a property type;
- Pass the Local Connection Test with the area in which they are seeking to live. For the avoidance of doubt please see the section below detailing the Local Connection Test for Affordable Home Ownership; and
- The Affordable Housing Unit must be the applicant's sole or principal home.
- Applicants will only be authorised to proceed with the tenancy / lease (as applicable) after meeting the criteria above. Applicants will normally only be permitted to occupy Affordable Housing Units with an excess of one bedroom for their current housing need, however discretion may be showed where it is reasonable to expect a household's need increase.
- Provided Always that notwithstanding the above the Council and Affordable Housing Provider may agree between themselves any amendment to the eligibility criteria set out in this Schedule where the Council shall deem it reasonable to do so and provided further that after such amendments are applied the applicant is able to demonstrate a housing need for a property type. The applicants must use the accommodation as their main and principal residence.
- If after the Affordable Housing Units have been marketed for 6 months there is no interest from applicants who comply with paragraphs 1 and 2 applicants who are ordinarily resident within the Borough can be considered as well as applicants who can demonstrate a need for affordable housing.

7.3.2 In order to be eligible for Shared Ownership applicants must:

- Not have a household income over £80,000 a year;
- Not be able to afford all of a house deposit and mortgage payments for a dwelling which meets their needs; and
- One of the following must be true:
 - o you are a first-time buyer
 - o you used to be a homeowner but can no longer afford to buy a new one
 - o you are forming a new household (e.g. following relationship breakdowns)
 - o you are an existing shared owner and wish to move
 - o you are a homeowner but can't afford a new home that meets your current needs

7.4 Local Connection Test

7.4.1 A Local Connection Test is something that an applicant for some forms of Affordable Housing needs to pass in order to be deemed eligible for said housing. The Council will make use of one of two different Local Connection Tests dependent upon whether the Affordable Housing is for Affordable Rent or Affordable Home Ownership. Additionally, given their unique circumstances Armed Forces personnel, veterans and their spouses / civil partners are not required to comply with the following Local Connection Test so long as they can evidence that they meet the definition of an "Armed Forces Member".(4)

7.4.2 The parameters of the Local Connection Test that need to be met to be deemed eligible for Social / Affordable Rental dwellings are detailed below:

- Applicants who, for a period of 6 months immediately prior to proposed occupation of an affordable dwelling, or 3 years out of the last 5, had their only or principal home in the Council's administrative area; or
- Applicants who, for a period of 12 months immediately prior to proposed occupation of an affordable dwelling, have had their only or principal place of employment within the Council's administrative area; or
- Applicants who have, immediately prior to the proposed occupation of an affordable dwelling, had a Close Supporting Family Connection, living within the Council's administrative area for a continuous period of 5 years.

7.4.3 The parameters of the Local Connection Test that need to be met to be deemed eligible for Affordable Home Ownership dwellings are detailed below.

7.4.4 First preference shall be given to applicants who:

- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, or 3 years out of the last 5, had their only or principal home within the same ward as the application site; or
- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, have had their only or principal place of employment within the same ward as the application site; or
- Have, immediately prior to the proposed occupation of an affordable dwelling, had a Close Family Connection, living within the same ward as the application site for a continuous period of 5 years.

(4) "Armed Forces Member": a member of the Royal Navy, Royal Marines, British Army or Royal Air Force or a former member who was a member within the five years prior to the purchase of the Affordable Dwelling, a divorced or separated spouse or civil partner of a member or a spouse or civil partner of a deceased member or former member whose death was caused wholly or partly by their service

Affordable Housing

7.4.5 If no person qualifies under paragraph 1 above, second preference shall be given to applicants who:

- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, or 3 years out of the last 5, had their only or principal home within a bordering ward to the ward the application site is within; or
- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, have had their only or principal place of employment within a bordering ward (within the Council's administrative area) to the ward the application site is within; or
- Have, immediately prior to the proposed occupation of an affordable dwelling, had a Close Family Connection, living within a bordering ward to the ward the application site is within for a continuous period of 5 years.

7.4.6 If no person qualifies under paragraph 2 above, third preference shall be given to persons who:

- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, or 3 years out of the last 5, had their only or principal home within the Council's administrative area; or
- For a period of 12 months immediately prior to proposed occupation of an affordable dwelling, have had their only or principal place of employment within the Council's administrative area; or
- Have, immediately prior to the proposed occupation of an affordable dwelling, had a Close Family Connection, living within the Council's administrative area for a continuous period of 5 years.

7.4.7 Before Qualifying Persons as described in paragraph 3 above shall become eligible for occupation, the Affordable Unit shall have been marketed for sale subject to the above categories 1 and 2 above for a period of at least 12 weeks, evidence of which shall be provided to the Council.

7.5 Close Family Connection

7.5.1 For the avoidance of doubt, the Council defines a Close Family Connection as one of following: spouse, civil partner, parent / guardian, children and siblings. We will also allow family associations through marriage and civil partnership e.g. stepparents, children. Other forms of Close Family Connection may be considered on a case by case basis.

7.6 Household Size

7.6.1 Households who will fully occupy the discounted sale property, or have a defined housing need, will be given priority. If a suitably sized household cannot be found, then households who will under-occupy will become eligible, starting with those who would only under occupy by one room and going beyond that if no applications are received within a specified time frame.



Appendix Two - Price Cap Calculations

8.1 In order to calculate the Price Caps for both First Homes and Discount Market Value dwellings, the following methodology has been utilised. Using data from the Office for National Statistics also allows the Council the opportunity to annually update these figures.

Median annual earning in Rossendale	£28,005
Median annual earning p/ household in Rossendale	$£28,005 \times 1.5 =$ £42,007.50
Mortgage Multiplier	$£42,007.50 \times 4 =$ £168,030
+10%	$£168,030 \times (10/9) =$ £186,700
Total price that could be raised by a median household in Rossendale.	£186,700

Median house price in Rossendale is £170,000, lower than what can be raised by a median household in Rossendale using the above methodology.

The data used in this methodology was taken from the Office for National Statistics “**House price to workplace-based earnings ratio**” dataset published in March 2024.





www.rossendale.gov.uk

Rosendale Borough Council,
The Business Centre,
Futures Park, Bacup,
OL13 0BB.



ROSSENDALE
BOROUGH
COUNCIL



AFFORDABLE HOUSING

SPD Consultation 24/09/2024 - 22/10/2024
All Responses Received



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Introduction

Rossendale Borough Council consulted on the Affordable Housing Supplementary Planning Document (SPD) between Tuesday 24th September 2024 and Tuesday 22nd October 2024.

The [Rossendale Local Plan 2019 to 2036](#) contains policy HS3 to ensure the delivery of appropriate Affordable Housing within the borough. This policy commits the Council to preparing a SPD to provide further details and guidance on Affordable Housing within the borough, specifically in relation to different affordability tenures. Detail is provided in the new SPD about Eligibility Criteria, Local Connection Tests and Affordable Home Ownership tenure Price Caps.

During the public consultation, 8 comments have been submitted from 7 statutory consultees and 1 resident. 4 consultees had no comments, 1 supported the SPD in particular regarding the uplift methodology, local connection test and price cap methodology.

3 consultees recommended modifications to the document or raised matters for consideration. One comment was received after the consultation period concluded.

All comments received during the consultation period are enclosed in this document.

The Forward Planning Team

Thank you for the opportunity to comment on the above SPD for Rossendale Affordable Housing.

National Highways have no specific comments to make on this document at this time, as it does not affect the strategic road network.

Kind Regards

Lindsay

**Lindsay Alder, PGCE,
Pronounced: Lind-say Al-der
Pronouns :She/Her/Hers
Spatial Planner
Network Development & Planning Team
OD EDI Lead
Equality Diversity and Inclusion NW Champion**
Please note new email address. Please update your address book to include this; [REDACTED]

National Highways | [REDACTED]
[REDACTED]

Web: <https://nationalhighways.co.uk/>

[REDACTED]



For information and guidance on on planning and the Strategic Road Network in England please visit:

<https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

Date: 10 October 2024
Our ref: 489039



Forward Planning Team
Rossendale Borough Council
Business Centre
Futures Park
OL13 0BB

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T [REDACTED]

Dear Sir/Madam

Planning consultation: Rossendale Local Plan - Open Space, Playing Pitch and Indoor Sports Facilities Supplementary Planning Document (SPD) & Affordable Housing SPD

Thank you for your consultation on the above dated and received by Natural England 24 September 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have reviewed the Open Space, Playing Pitch and Indoor Sports Facilities SPD and the Affordable Housing SPD and have the following comments to make:

Open Space, Playing Pitch and Indoor Sports Facilities SPD

Natural England welcome the reference to the Green Infrastructure Framework of Principles and Standards as part of the aim to provide design guidelines for new open spaces.

Q2: Yes, NE would support the provision of amenity greenspace on similar development. As stated, this can contribute to Biodiversity Net Gain (BNG) requirements in line with the mitigation and biodiversity hierarchies which incentivise onsite BNG.

Q5: Natural England are in agreement with the proposals specified in Step 4. We particularly welcome reference to urban greenspace provision and incorporation of rain gardens and wetlands.

Q9 and Q10: Yes, Natural England encourage the use of a voluntary Urban Greening Factor for new developments and are willing to provide advice and support where relevant.

Affordable Housing SPD

Natural England has no comments to make on the Affordable Housing SPD.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact [REDACTED] quoting the reference 489039.

Yours sincerely

Nicholas Armstrong
Sustainable Development Higher Officer



The Coal
Authority

[Redacted]

W: www.gov.uk/coalauthority

For the attention of: Forward Planning Team

Rossendale Borough Council

[By email: forwardplanning@rossendalebc.gov.uk]

14th October 2024

Dear Forward Planning Team

Re: Rossendale Borough Council - Open Space, Playing Pitch and Indoor Sports Facilities SPD and Affordable Housing SPD

Thank you for your notification of the 24th September 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

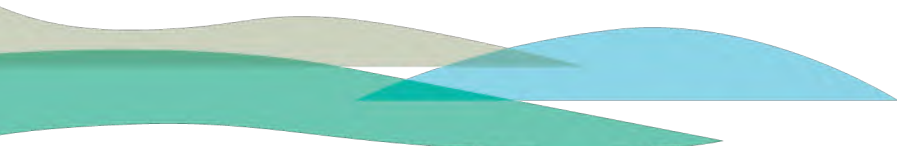
Our records indicate that within the Rossendale area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

It is noted that this current consultation relates to SPDs on Affordable Housing and Open Space and Sports Facilities and I can confirm that the Planning team at the Coal Authority have no specific comments to make on these documents.

Yours faithfully

[Redacted Signature]

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager





Forward Planning
Rossendale Borough Council
Forward Planning Team
Futures Park
OL13 0BB

[REDACTED]
Our ref: PL00797037

16 October 2024

Dear Sir/Madam

Rossendale Council - Affordable Housing SPD

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for your email notifying Historic England of the intention to prepare an affordable housing SPD. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Yours sincerely,

Emily Hrycan
Historic Environment Planning Adviser (North West)



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

[REDACTED]
HistoricEngland.org.uk

Affordable Housing SPD Consultation

Response

Please provide your contact details:

First name and Surname

Megan
Eastwood

Address or Postcode

Futures
Park

Email address (if you would like to be added to the Planning Policy database and be informed of the adoption of the document)

-

If you would like to be added to the Planning Policy database and be informed of the adoption of the document please read and confirm you have read the privacy notice:

I confirm that I have read and understood the privacy notice

Please select the statement that best applies to you:

Statutory Consultee

Q1. Do you have any comments to make regarding the proposed uplift calculations for off-site contributions?

These are in line with other areas and encourage developer to deliver on site.

Q2. Do you agree with the DMV Price Cap? If not, please explain why e.g. too low / high, should a different methodology be used?

Yes

Q3. Do you think that anything should be amended / removed / added to the Social / Affordable Rent Eligibility Criteria?

No Response

Q4. Do you think that anything should be amended / removed / added to the Shared Ownership / DMV Eligibility Criteria?

No Response

Q5. Do you think that the Local Connection Test is appropriate for Rossendale? Is there anything that you would change?

Yes

Q6. Is there any other relationship you think should be classed as a "Close Family Connection"?

No Response

Q7. Do you agree with this methodology?

Yes

Q8. If there are any more comments you would like to make you can do so below. Please clearly state which part of the document you are referring to by using the document headings / page numbers / paragraph numbers.

Strategic Housing has been involved and consulted on through the development of this SPD. The methodology has been considered in detail and the approach to calculating off site contributions, which aim to incentivise developers to deliver much needed affordable housing on the site.

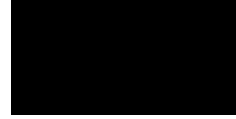
Response 2

Please provide your contact details:

First name and Surname

Olivia Birks

Address or Postcode



Email address (if you would like to be added to the Planning Policy database and be informed of the adoption of the document)

If you would like to be added to the Planning Policy database and be informed of the adoption of the document please read and confirm you have read the privacy notice:

I confirm that I have read and understood the privacy notice

Please select the statement that best applies to you:

Statutory Consultee

Q1. Do you have any comments to make regarding the proposed uplift calculations for off-site contributions?

N/A

Q2. Do you agree with the DMV Price Cap? If not, please explain why e.g. too low / high, should a different methodology be used?

Comment:
N/A

Q3. Do you think that anything should be amended / removed / added to the Social / Affordable Rent Eligibility Criteria?

N/A

Q4. Do you think that anything should be amended / removed / added to the Shared Ownership / DMV Eligibility Criteria?

N/A

Q5. Do you think that the Local Connection Test is appropriate for Rossendale? Is there anything that you would change?

Comment:
N/A

Q6. Is there any other relationship you think should be classed as a "Close Family Connection"?

N/A

Q7. Do you agree with this methodology?

Comment:
N/A

Q8. If there are any more comments you would like to make you can do so below. Please clearly state which part of the document you are referring to by using the document headings / page numbers / paragraph numbers.

5.12 Specialist Housing/Older Persons Housing

5.12.3 The Local Plan allocates three sites specifically for specialist accommodation:

H19 – Former Bacup Health Centre

H48 – Former Waterfoot Primary School

H61 – Land behind Buxton Street, Whitworth

The former Waterfoot Primary School can be considered a NDHA - this should be taken into account if any development of the site is to take place.

6.3 Vacant Building Credit

6.3.2 Where the development proposes an increase in the amount of overall floorspace, the Council will calculate the amount of affordable housing contributions required in line with the existing policy in the Local Plan. However, a

Vacant Building Credit should then be applied which is equivalent to the gross amount of floorspace brought

brought back into use or created via a new building.

6.3.3 For example:

A proposal is submitted to demolish a small vacant mill building which has a gross floorspace of 1000sqm

and replace it with a new apartment building with a gross floorspace of 2000sqm and 40 apartments contained within.

Rossendale has many mills which are considered to be NDHAs - again, this should be taken into account if any development of a mill site is to take place.

Good day.

Paragraphs 4.2 and 4.3 in the subject document are identical. Is this intentional?

Regards

Ian Francis

[REDACTED]

[REDACTED]

--

Sent with GMX Mail app



Property Services

Rossendale Borough Council
Planning Team
Business Centre
Futures Park
Bacup OL13 OBB
forwardplanning@rossendalebc.gov.uk

NHS Property Services Ltd
[REDACTED]
[REDACTED]
[REDACTED]
www.property.nhs.uk

22nd October 2024

BY EMAIL ONLY

RE: Consultation on Rossendale Draft Affordable Housing Supplementary Planning Document

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

Draft Affordable Housing Supplementary Planning Document

As part of preparing the delivery of this Supplementary Planning Document (SPD), we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The SPD references national policy in paragraph 2.1.2 which supports affordable housing for '*essential local workers*'. NHSPS suggests that this is reflected within the affordable housing provision of the SPD and wider development plans. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve

is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Conclusion

NHSPS thank Rossendale Borough Council for the opportunity to comment on the draft Affordable Housing SPD. We trust our comments will be taken into consideration. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the SPD and any future consultations via our dedicated email address, [REDACTED]

Yours faithfully,

Daniel Fleet
Town Planner

E: [REDACTED]

For and on behalf of NHS Property Services Ltd

Responses received after the consultation concluded

Emailed to: forwardplanning@rossendalebc.gov.uk

22nd October 2024

www.cprelancashire.org.uk

Dear Rossendale Planning Department

Group President

Nick Thompson

Group Chair

AFFORDABLE HOUSING SPD CONSULTATION

1. I am writing a response to the consultation on the Affordable Housing SPD on behalf of the CPRE, The Countryside Charity in Lancashire, Liverpool City Region and Greater Manchester.
2. CPRE focuses on six key tests when planning for rural places, which are relevant to all spatial levels. Below, I set out overarching comments concerning the six tests (promoted by the Better Planning Coalition).

(1) Local Democracy and Community Engagement

The SPD demonstrates some commitment to community engagement by including questions for public feedback and directing people to an online survey. This suggests an effort to gather community input on specific aspects of affordable housing policy. The document also mentions the need to meet "local needs" when considering housing development, particularly for specialised housing in rural areas. This demonstrates an awareness of the importance of local context in shaping affordable housing provision (pp. 1, 2). However, the document falls short of providing a comprehensive plan for community engagement. It doesn't outline specific mechanisms for how this feedback will be integrated into decision-making processes beyond the provided questions. Additionally, it doesn't specify how the council plans to ensure ongoing community involvement beyond the initial consultation phase (p, 3). This could be improved by including more details on how the council plans to facilitate meaningful and ongoing engagement with the community throughout planning and implementation stages.

(2) Affordable Housing and Developer Contributions

The SPD demonstrates a strong commitment to delivering affordable housing and establishing a clear framework for developer contributions. It provides a detailed explanation of the different types of affordable housing recognised by the council, including social rent, affordable rent, shared ownership, and discount market sales housing (pp. 10, 11, 12, 13). The document emphasises the use of Section 106 agreements to secure affordable housing provision, ensuring long-term affordability for residents (pp. 14, 15, 16, 17). It outlines specific requirements for developers, including the target of 30% affordable housing on applicable market housing schemes (p. 18). Additionally, the SPD includes a detailed methodology for calculating contributions when on-site provision is not feasible, adopting an "uplift" to

compensate for the increased number of market-rate units in such cases. This approach ensures that the financial contributions reflect the value of the affordable housing that would have been provided on-site (pp. 19, 20, 21, 22). Overall, the SPD's approach to affordable housing provision and developer contributions strongly aligns with the principles of Test 2, aiming for a transparent, effective, and equitable system for delivering affordable homes.

(3) Climate and Sustainable Development

The SPD primarily focuses on the provision of affordable housing and does not adequately address climate change mitigation or broader sustainability goals. Whilst it briefly mentions encouraging brownfield development through "vacant building credits," this incentive alone does not constitute a comprehensive strategy for sustainable development (pp. 10, 26). The document lacks any mention of energy efficiency standards for affordable homes, strategies to reduce the carbon footprint of housing developments, or the integration of renewable energy sources. It also does not address the importance of promoting green infrastructure within developments. The lack of attention to these critical aspects of sustainable development results in the SPD not meeting this test. To improve, the SPD should be revised to incorporate specific policies and measures that promote environmentally responsible and climate-resilient affordable housing.

(4) Biodiversity and Nature's Recovery

The SPD's narrow focus on housing provision leads to an absence of considerations related to biodiversity. The document lacks any mention of measures to protect or enhance biodiversity within or around housing developments. It doesn't address the importance of incorporating green spaces, protecting existing habitats, or promoting biodiversity net gain. The absence of any provisions for biodiversity conservation results in the SPD not meeting this test. To address this deficiency, the SPD should be revised to include policies that promote nature-friendly development and contribute to the conservation and enhancement of biodiversity.

(5) Beauty and Heritage

The SPD marginally touches upon aspects related to beauty and heritage. It highlights the even distribution of affordable housing units throughout larger developments, aiming to prevent the concentration of affordable homes in one area (p. 36). The document also mentions ensuring that specialist housing developments are well-located with appropriate external amenity space, suggesting a degree of consideration for the surrounding environment (p. 2). However, the SPD lacks a robust discussion of design principles, architectural quality, or the integration of new developments with the existing built environment and character of the area (pp. 2, 36). It does not mention any specific measures to protect or enhance existing heritage assets, or how new developments will be designed to respect and complement local character. The limited attention to design considerations, particularly the lack of reference to heritage protection, results in the SPD not meeting this test and the SPD should address this.

(6) Health Wellbeing, and Access to Natural Green Space

The SPD acknowledges the importance of housing for health and wellbeing and includes some provisions that indirectly support these goals. For instance, it encourages wheelchair-accessible homes within the social rented sector and recognises the need to accommodate

the needs of various demographics, including the elderly and those with disabilities (pp. 2, 15). The document also references the need for accessible amenities in specialised housing developments, further demonstrating consideration for the well-being of residents (p.2). However, the SPD's primary focus remains on meeting housing needs rather than promoting broader health outcomes. It lacks specific provisions for promoting active travel, access to quality green spaces, or addressing potential health impacts associated with development which should be addressed.

3. If you require any further information, please do not hesitate to contact me

Yours sincerely



Edward Taylor MRTPI, BA (Hons), MCD, Master Urban Design
Planning Director, Planning Manager for CPRE Lancashire, Liverpool City Region, Greater Manchester

Equality Impact Assessment

The council carry out Equality Impact Assessments (EIA) to analyse the effects of our decisions, policies or practices.

Throughout this document, policy refers to any policy, strategy, project, procedure, function, decision or delivery or service.

The EIA should be undertaken/started at the beginning of the policy development process before any decisions are made.

Policies are developed and reviewed using a consultative approach involving relevant internal and external stakeholders. Officers must consider what action needs to be taken to help overcome or minimise any disadvantages that people who share a protected characteristic will experience in compliance with the Equality Act 2010.

Name of policy:	Affordable Housing Supplementary Planning Document
Lead officer name	Jacob Landers
Job title	Senior Planning Officer (Forward Planning)
Service area	Planning
Telephone contact	01706 252412
Email contact	jacoblanders@rossendalebc.gov.uk
Date Assessment commenced	20/11/23
Date assessment completed	17/05/24

The main aims/objectives of this policy are:

The Affordable Housing SPD provides further detail to accompany and support the implementation of Policy HS3 of the adopted Local Plan. This detail should provide greater clarity to developers, Planning Agents, Planning Officers and the public as to what quantity and tenure type of Affordable Housing would be appropriate on a potential residential development site.

The SPD sets out the Council's preferred form of long-term affordable housing provision tenures, price and income caps for certain forms of affordable house ownership, uplift mechanisms and eligibility criteria for the different affordable dwelling tenures.

Indicate the status of the policy or decision

New/proposed Modified/adapted Existing

Indicate protected characteristics have been assessed

Age	<input checked="" type="checkbox"/>	Disability	<input checked="" type="checkbox"/>	Gender reassignment	<input checked="" type="checkbox"/>
Religion/belief	<input checked="" type="checkbox"/>	Sexual orientation	<input checked="" type="checkbox"/>	Sex	<input checked="" type="checkbox"/>
Pregnancy/maternity	<input checked="" type="checkbox"/>	Race	<input checked="" type="checkbox"/>	Marriage or civil partnership	<input checked="" type="checkbox"/>

1. State any positive or negative impact on the protected characteristic(s) (added additional rows if needed)

Protected characteristic	Positive/Negative	How does it impact?
Age	Neutral	The benefits of the document would be equal as they apply to the public generally
Disability	Neutral	The benefits of the document would be equal as they apply to the public generally.
Religion/belief	Neutral	The benefits of the document would be equal as they apply to the public generally.
Race	Neutral	The benefits of the document would be equal as they apply to the public generally.
Pregnancy/maternity	Neutral	The benefits of the document would be equal as they apply to the public generally.
Sexual orientation	Neutral	The benefits of the document would be equal as they apply to the public generally.
Gender reassignment	Neutral	The benefits of the document would be equal as they apply to the public generally.
Sex	Neutral	The benefits of the document would be equal as they apply to the public generally.
Marriage or civil partnership	Neutral	The benefits of the document would be equal as they apply to the public generally.

2. Explain and give examples of any evidence/data used (add additional rows if needed)

Evidence	How does this have an impact on the protected characteristic?
Office for National Statistics "House price to workplace-based earnings ratio" dataset (March 2023)	N/A

3. Outcome of EIA

What course of action does this EIA suggest you take?	Please indicate
Outcome 1- The EIA has not identified any potential for negative impact on the protected characteristics. Progress to EIA approval – section 5	<input checked="" type="checkbox"/>
Outcome 2- The EIA has identified a possibility for negative impact on the protected characteristics. An EIA Action Plan must be completed to mitigate the negative impact – section 4 before approval section 5	<input type="checkbox"/>

4. EIA action plan

Based on the above impact assessment, findings/evidence and outcomes identified, please complete the Action Plan below. The action plan should address:

- Any gaps in findings/evidence research including any consultation or engagement regarding the policy and its actual/potential impacts
- How you will address any gaps
- What practical changes/action that will help reduce any negative impacts identified
- What practical changes/action that will help enhance any positive contributions to equality

Negative impact identified	Action required	Lead officer	To be completed

Monitoring and reviewing the effect of the policy

Please state how you will monitor the impact and effect of this policy

The Affordable Housing SPD will be monitored for effectiveness as part of the annual Authority Monitoring Report (AMR), this will cover how many affordable dwellings have been approved / delivered in the monitoring period and what tenure they are.

The need for a review of the policy will be determined as part of the AMR process and also any future Local Plan review.

5. EIA approval (to be completed by the relevant Head of Service/Director)

- Outcome of EIA agreed/approved by Management Team: (date)
- Published on council website: (date)

Signed: (Head of Service/Director) (date)