

Subject: Rossendale Interim Housing Policy Statement **Status:** For Publication / Adoption for Development Control purposes

Report to: Policy Scrutiny Committee **Date:** 26th November 2007
Cabinet 12th December 2007
Full Council 19th December 2007

Report of: Executive Director of Regulatory Services

Portfolio

Holder: Portfolio Holder for Regenerating and Promoting Rossendale

Key Decision: No

Forward Plan General Exception Special Urgency

1. PURPOSE OF REPORT

- 1.1 This report seeks Cabinet approval to formally adopt a Revised Interim Housing Policy Statement (which is attached as Appendix 1) for development control purposes with immediate effect.
- 1.2 It should be noted that the Revised Interim Housing Policy Statement is a combination of the Interim Housing Position Statement and the Affordable Housing Position Statement which were approved by Cabinet on 24th January 2007 for development control purposes but also published for public consultation.
- 1.3 This report brings back to Cabinet a revised Interim Housing Policy that has been subject to amendment in light of the representations received from the January consultations. The two previous documents have been combined to try and achieve a balanced approach which takes into account concerns regarding housing oversupply, but also regenerative priorities and the delivery of affordable housing.

2. CORPORATE PRIORITIES

- 2.1 The matters discussed in this report impact directly on the following corporate priorities and associated corporate objective.
- Delivering Quality Services to Customers (Customers, Improvement) through ensuring applicants are clear on our policies.

- Delivering Regeneration across the Borough (Economy, Housing). The Interim Policy will encourage development of the right kind, at the right time and in the right place.
- Promoting Rossendale as a cracking place to live and visit (Economy), by achieving high quality development.
- Well Managed Council (Improvement, Community Network) by having robust policies in place to use.

3. RISK ASSESSMENT IMPLICATIONS

3.1 All the issues raised and the recommendation(s) in this report involve risk considerations as set out below:

- The Revised Housing Policy is an essential tool in ensuring planning applications are determined in accordance with national, regional and local policy. To not adopt the policy would undermine the Council's ability to manage the release of housing land in accordance with the requirements of the Joint Lancashire Structure Plan.
- In light of the number of residential planning applications coming forward, it was considered inappropriate to wait for the emerging Local Development Framework to gain significant weight before addressing housing issues.

4. BACKGROUND AND OPTIONS

4.1 Members may recall that at a Cabinet meeting on 24th January 2007, a draft Revised Housing Position Statement and Affordable Housing Position Statement were approved for development control purposes but also published for public consultation.

4.2 This revised Interim Housing Policy has been produced in light of 18 representations received during the consultation process. A schedule of representations and recommended responses are attached as an appendix to the Revised Policy (which is attached as Appendix 1).

4.3 Summary of responses received:

- Policy should include an affordable and special needs housing exception policy.
- Policy should include further quantitative information of the current residential land supply to more clearly justify the severity of the situation.
- Policy should clarify that even if a site meets the terms of the interim policy, they must also meet all other planning requirements to be acceptable for development.
- Add a development criterion that states that housing that forms a key element within a mixed-use regeneration project; that

helps to achieve the Borough's regeneration objectives, should be permitted. This is required as part of the supplementary text to Joint Lancashire Structure Plan policy 12.

- The document should make reference to emerging housing figures in the Regional Spatial Strategy, which whilst not part of the development plan are a material consideration in determining planning applications.
- Policy should make the next steps more transparent – in terms of withdrawal of Interim Policy upon progression of the Regional Spatial Strategy.
- Desire to broaden the scope of where conservation led housing schemes are considered acceptable.
- Plans should be included within the reviewed interim policy to show the geographical scope of some of the policies.
- The title of the document should be amended, to reflect that it is an Interim Housing Policy and not merely a position statement.
- Clarify the status of the interim policy in the revised document and how it does not outweigh existing development plan policies.

In addition to the above responses received through the consultation period, comments have been received since the publication of this report from Mr. S Hartley of Hartley Planning and Development Associates Ltd and Mr. D Hartley of Hurstwoods Group Ltd. A summary of their representations and response from the Council is contained in Appendix 2.

5. COMMENTS OF THE HEAD OF FINANCE

- 5.1 There are no immediate financial implications

6. COMMENTS OF THE EXECUTIVE DIRECTOR OF REGULATORY SERVICES

- 6.1 Clearer policies ensure our customers are aware of what type of housing developments will be considered acceptable. By adopting the Interim Policy following a public consultation exercise, the policy will also have more weight.

7. COMMENTS OF THE HEAD OF PEOPLE AND ORGANISATIONAL DEVELOPMENT

- 7.1 There are no Human Resources implications

8. CONCLUSION

- 8.1 The Interim Housing Policy Statement seeks to achieve a balanced approach that takes into account the concerns regarding oversupply of

housing in the Borough, but also regeneration priorities and the delivery of affordable housing.

- 8.2 The interim policy will remain relevant guidance until such a time as the current housing figures in policy H12 are superseded by the Regional Spatial Strategy (currently estimated for early 2008) and the Council can pursue a plan led approach to housing provision through the LDF. It will also be reviewed regularly to take account of government guidance as and when it emerges.

9. RECOMMENDATION(S)

- 9.1 That Policy and Scrutiny approve the Interim Housing Policy Statement for consideration by Full Council 19th December 2007.
- 9.2 Subject to the above, that the policy is adopted, agreed and agreed by Full Council and applied to all applications received after 19th December 2007.
- 9.3 For Development Control purposes the Council resolves to amend the revised Preferred Options Rawtenstall Area Action Plan, to acknowledge that the housing contributions it proposes will contribute towards overall housing supply within the borough.

10. CONSULTATION CARRIED OUT

- 10.1 Because it is not part of the LDF, there were no statutory consultation requirements. However, the Council has undertaken a number of consultation exercises on the policy statement. The consultation responses from the most recent draft (January 2007) have been included in Appendix E and F of the Interim Policy Statement, as well as the changes that have been made in response to the comments in this iteration of the policy statement.
- 10.2 Internally, reports to Cabinet have been completed for each of the previous versions of the Interim Housing Policy Statement.

11. EQUALITY IMPACT ASSESSMENT

Is an Equality Impact Assessment required Yes

Is an Equality Impact Assessment attached Yes

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Background Papers	
Document	Place of Inspection
Revised Housing Policy Statement Residential Land Availability Monitoring Joint Lancashire Structure Plan Housing Market Needs Assessment	Council Offices

APPENDIX 1 – REVISED HOUSING POLICY STATEMENT

Background

This policy statement has been prepared to provide further guidance on how the Council intends to manage the release of housing land prior to the adoption of the new Local Development Framework (LDF).

The guidance note; based on existing residential land monitoring and the Council's LDF evidence base, has been borne out of two major concerns:

- The Council cannot demonstrate that it is successfully managing the release of housing land in accordance with the requirements of the Joint Lancaster Structure Plan (JLSP);
- The Council is failing to deliver an adequate level of affordable housing in Rossendale.

Existing Development Plan Context

The Planning and Compulsory Purchase Act 2004 S38 (6) requires that any planning application be determined with regard to the Development Plan for the area, so far as it is material, and any other material planning consideration be taken into account.

The current Development Plan for Rossendale comprises of the:

- Regional Spatial Strategy (RSS)
- Joint Lancashire Structure Plan (JLSP) & Minerals and Waste Local Plan; and
- Rossendale District Local Plan (Local Plan)

This policy statement outlines the Council's interpretation of existing development plan policies that relate to housing.

Regional Spatial Strategy (RSS)

Regional Planning Guidance was adopted as the North West Region's strategic planning document and became the Regional Spatial Strategy on 28 September 2004. One of the main objectives of the Regional Spatial Strategy is to focus on the North West Metropolitan Area and increase regeneration development in that area. This requires a reduction in development outside the corridor. The Regional Spatial Strategy (2004) is reflected in the Joint Lancashire Structure Plan 2001 – 2016 which was adopted 31st March 2005, which is discussed overleaf.

Local Plan

The Local Plan, adopted on 12th April 1995, was intended to be reviewed by 2001. It is now to be replaced by the LDF, which will contain a portfolio of documents intended to replace the Adopted Local Plan. The Local Plan is

now out of date in respect of several policies which are deemed to be not in conformity with the JLSP. Therefore of particular relevance to residential planning applications is the JLSP.

Joint Lancashire Structure Plan 2001-2016

Policy 12 (Appendix D) sets out future new dwelling requirements for all sections of the community including those requiring affordable housing across the local authorities in Lancashire. It outlines a target of **1,920 new dwellings in Rossendale between 2001 and 2016**. It states that in most Districts / Boroughs there are currently sufficient sites with residential planning permission to meet at least the short-term housing provision set by Policy 12, and often for much longer. Within Rossendale there is currently 1417 outstanding planning permissions, which equates to 15.3 years housing supply against the Structure Plan targets (see table 2 for further explanation).

Policy 12 states that outstanding planning permissions tend to be dominated by proposals for market housing, with only very limited numbers of dwellings approved to meet local affordable housing needs. Information obtained from the Council's Strategic Housing Department, suggests that between 2006 and 2010 135 affordable housing units will be supplied.

Under the normal operation of Policy 12 (as described in the text box on page 51), current levels of oversupply affecting many areas of Lancashire could preclude the necessary provision of affordable houses. This is the challenge currently facing Rossendale Borough Council.

Policy 12 states:

Where there is a significant oversupply of housing permissions, planning applications for further residential development may not be approved unless they make an essential contribution to the supply of affordable or special needs housing or form a key element within a mixed use regeneration project. Any such project should be compatible with, and help achieve, the regeneration objectives of the Local Authority. Districts may identify, through the Local Plan/Local Development Framework process, other circumstances where it may be appropriate to approve residential development in a situation of housing oversupply, such as the conservation benefits of maintaining an existing building worthy of retention.

Given that the Council can demonstrate that there is a significant oversupply of housing permissions, this policy statement outlines how the Council intends to apply policy 12 of the Structure Plan to planning applications. Whilst it is noted that the policy states that additional development criteria should be identified through the LDF process, the Council has included a number of "other circumstances" where it may be appropriate to approve residential development, so that regeneration objectives are not stifled in the interim period prior to progression with the LDF.

The Current Position

The following table outlines the Borough's current housing land supply for period 2001 – 2007.

Table 1: Housing Land Supply for Period 2001 - 2007

Development Plan Allocation 2001-2016	1920
Housing Completions 2001 – 2007	1087
Residential Requirement	833
minus	
Outstanding Commitments at 2007	1417
Current Position	-584

There is a current oversupply of 584 units, against the Structure Plan target of 1920. It is important to stress that there is still 9 years of the plan period remaining. Without limiting the supply of housing land, there is a concern that the figures in the development plan will be greatly exceeded, compromising sustainable development in the Borough and prejudicing the proper planning of new employment, services and infrastructure.

Table 2: Housing Land Supply at 31 March 2003– Residual Method

County Structure Plan Requirement	1920
Completions (2001- 2007)	1087
Residual Amount	833
Remaining Structure Plan period	9
Annual Average Completions Required	92.6
Five Year Supply	463
Outstanding Planning Permissions	1417
Current Years Supply	15.3 years supply

The current situation (March 2007) with existing planning permissions constitutes approximately 15.3 years supply in the context of the strategic housing requirement in the Structure Plan. PPS3 states that Local Authorities should retain a rolling five-year supply of housing land.

Table 3: Key Service Centre Affordable Housing Need 2007

Haslingden: Worsley, Helmshore and Greenfield wards					
General Needs		Total	Older Person	Total	Total Units
1/2 Beds	3/4 Beds		1/2 Beds		
117	31	148	3	3	151
Rawtenstall: Longholme, Hareholme, Cribden, Goodshaw, Eden and Whitewell wards					
General Needs		Total	Older Person	Total	Total Units
1/2 Beds	3/4 Beds		1/2 Beds		
254	64	318	6	6	324
Bacup: Greensclough, Irwell and Stackstead wards					
General Needs		Total	Older Person	Total	Total Units
1/2 Beds	3/4 Beds		1/2 Beds		
18	6	24	1	1	25
Whitworth: Facit & Shawforth and Healey & Whitworth wards					
General Needs		Total	Older Person	Total	Total Units
1/2 Beds	3/4 Beds		1/2 Beds		
20	6	26	1	1	27

In 2004, Rossendale Borough Council commissioned David Cumberland Housing Regeneration Ltd to undertake a comprehensive Housing Market Needs Assessment. The assessment identified the level of affordable housing need to be 354 units for the period 2005 – 2010. These figures have been updated in 2007, with the breakdown across the Key Service Centre Areas / Housing Market Areas outlined above. **This illustrates that the level of annual affordable housing need is has risen to 105 dwellings per annum.**

Most of the affordable housing need requirement within Rossendale falls within the six wards of Cribden, Eden, Goodshaw, Greenfield, Helmshore and Longholme, which are predominantly to the north, west and south of Rawtenstall.

The build rate over the period 2001 – 2006 was approximately 200 dwellings per annum. Based on this historic build rate, over 50% of residential development or more would need to be affordable to deliver the 105 units per annum as identified in the Housing Market Needs Assessment.

The overall housing position that the Council faces is that there is an oversupply of housing based on its requirement up to 2016, yet an undersupply of 105 affordable housing units per annum. If the Council pursued a complete moratorium on housing development this would help to manage the oversupply of housing, but would do nothing to address the existing shortfall of affordable housing units. In contrast, if the Council was to

completely satisfy its affordable housing requirements this would require a further 527 units, perpetuating the over-supply of housing (particularly as this is likely to require substantial amounts of market housing to levy contributions).

The purpose of this interim policy statement is to outline the Council's preferred approach to dealing with the current housing situation and dealing with the requirements of policy 12 of the Structure Plan.

Status of the Policy Statement

The contents of the Interim Policy are supplementary to policy 12 of the JLSP. Whilst the Council could have pursued the document as a SPD, this was rejected for a number of key reasons. Firstly, by the time the document had been adopted, new housing figures in the RSS are likely to have been published – undermining its long term usefulness and making it a questionable use of Council resources to pursue as an SPD. Moreover, this would still leave an immediate gap in terms of advice to developers of the Council's requirements to plan, monitor and manage the release of housing land in accordance with policy 12 of the Structure Plan.

Previous Consultation Undertaken

Because it is not part of the LDF, there were no statutory consultation requirements. However, the Council has undertaken a number of consultation exercises on the policy statement, appreciating the importance of this issue. The consultation responses from the most recent draft (January 2007) have been included in Appendix E and F, as well as the changes that have been made in response to the comments in this iteration of the policy statement.

During 2004, Rossendale published a consultative draft Interim Housing Policy to provide supplementary guidance to H3 of the Local Plan. However in light of representations received, and H3 being revoked following the issuing of a Statement of Non-Conformity by Lancashire County Council on the 6th July 2005, the proposed supplementary guidance did not proceed.

The Borough issued a revised interim position statement in August 2005 to clarify residential development policy. More recently (in light of PPS3, updated monitoring information, new evidence identifying affordable housing need in the Borough and experience of implementing the Interim Housing Position Statement) Revised Interim Housing was released (January 2007)

This has now been merged with the affordable housing policy statement that was published at the same time.

Application

Upon consideration by the Council's Cabinet, this policy statement will apply with immediate effect to applications, outlining the interpretation of Structure Plan policy 12 in Rossendale.

The interim policy will remain relevant guidance until such a time as the current housing figures in policy H12 are superseded by the Regional Spatial Strategy and the Council can pursue a plan led approach to housing provision through the LDF. Emerging Regional Spatial Strategy housing figures are discussed towards the end of this interim policy statement.

The Policy Statement

As an interim measure, until the Council is able to pursue a plan led approach to accommodating new development anticipated as part of the Regional Spatial Strategy, the release of further housing land will be restricted to sites which make an essential contribution to the supply of affordable or special needs housing or help achieve the regeneration objectives of the Local Authority. In order to plan, monitor and manage the release of housing land in the Borough, applications for residential development will only be acceptable in the following circumstances:

- a) The replacement of existing dwellings provided that the number of dwellings is not increased.
- b) The proposal can be justified in relation to agricultural and forestry activities.
- c) In relation to listed buildings and important historic buildings, the applicant can demonstrate the proposal is the only means to their conservation.
- d) Conversion or change of use of buildings within the urban boundary of the main development location within the Borough (Appendix B) where the number of units is 4 or less.
- e) New build proposals on previously developed land and buildings (PDLB) within the urban boundary of the main development location (Appendix B) where the number of units is 20 or less. These proposals will only be acceptable where they make an essential contribution to the supply of affordable housing as interpreted in appendix A.
- f) Proposals on previously developed land and buildings (PDLB) within the regeneration priority areas of Rawtenstall Town Centre AAP or Bacup, Stacksteads and Britannia AAP (illustrated in Appendix C) that will deliver regeneration benefits*. Where proposals are for 15 or more dwellings, the Council will seek to obtain 30% affordable housing (where there is a clear need as demonstrated through the Housing Needs Assessment). A reduction in the affordable housing requirement will only be acceptable where the applicant pays for the Council to approach an independent specialist to test their arguments on viability.
- g) Developments that are solely for affordable or special needs housing will be supported where they address local need and are appropriate in terms of their scale and location.
- h) Within the urban boundary of the main development location or the regeneration priority areas where residential development is part of a mixed-use scheme that will have essential regenerative benefits* for the Borough. Where proposals include 15 or more dwellings, the Council will seek to obtain 42% affordable housing (where there is a clear need as demonstrated through the Housing Needs Assessment). A reduction in the affordable housing requirement will only be acceptable where the applicant pays for the Council to approach an independent specialist to test their arguments on viability.

It is however stressed that even if sites meet the terms of the interim policy outlined above, they must also meet all other requirements to be acceptable for development. These requirements include assessment of flood risk and transport impact, as well as the need to conform to development plan policies covering the impacts of development.

* Rossendale Borough Council defines “regeneration benefits” as;

“Those which go beyond the simple re-development of Previously Developed Land/ Buildings (PDL/ PDB); having sustainable and substantiated social / environmental / economic credentials for amenities in the locality. In addition such benefits should accord with the regeneration objectives and priorities as identified by the Council.”

Justification

The policy statement seeks to achieve a balanced approach that takes into account the concerns regarding oversupply outlined above, but also regeneration priorities and the delivery of affordable housing.

Proposals under (e) will not be acceptable unless the affordable housing requirement is fully met. PPS 3 clearly states that whilst the national indicative minimum site size threshold is 15 dwellings, local planning authorities can set lower minimum thresholds, where viable and practicable, including in rural areas. This approach has been adopted, based on the findings of the Housing Market Needs Assessment.

At the current time the Council requires no more market housing to satisfy the Housing requirements of the Structure Plan, but is willing to accept some where it helps deliver essential affordable or special needs housing. Without this contribution, the residential development is deemed undesirable under the current policy climate.

Development outside of the main development locations and the priority regeneration areas will be permitted where they are for solely affordable housing and meet all other planning criteria.

Between 10% to 20% of the affordable provision will be of intermediate tenure unless the Housing Market Needs Assessment indicates a higher requirement.

Where required, there is a presumption that affordable housing will be provided on site in accordance with PPS 3. However, the Council recognises in exceptional circumstances a financial contribution in lieu of on site provision may be more appropriate. The formula for off-site contributions on affordable housing is consistent with the planning obligations paper approved by Cabinet on 13th December 2006 and is as follows:

Equivalent open market dwelling price (£) – affordable level (£) = Affordable housing contribution per property.

Emerging Policy Context

Emerging Regional Spatial Strategy

The emerging RSS is not as relevant to current planning applications as the adopted Structure Plan. However, an assessment of land supply in the context of the draft RSS (2006) housing figures is included below.

RSS Requirement (2003-2021)	4000
Completions (2003- 2007)	789
Residual Amount	3211
Remaining Plan period	14
Annual Average Completions Required	229
Five Year Supply	1147
Outstanding Planning Permissions	1417
Current Years Supply	6.9 years supply

Indicative calculations suggest that the Council has a 6.9 year supply of housing in the context of the emerging RSS. Were all of the outstanding planning permissions to be implemented, there would be a residual requirement for 1794 further dwellings up to 2021. This figure, equivalent to 128 per annum, is significantly lower than the completion rate since the start of the plan period (2003 – 2007) of 197 dwellings per annum.

Emerging Local Development Framework

Although work on the LDF is in progress, in view of the number of residential planning applications coming forward, it would be inappropriate to wait for the LDDs to gain significant weight before addressing these issues

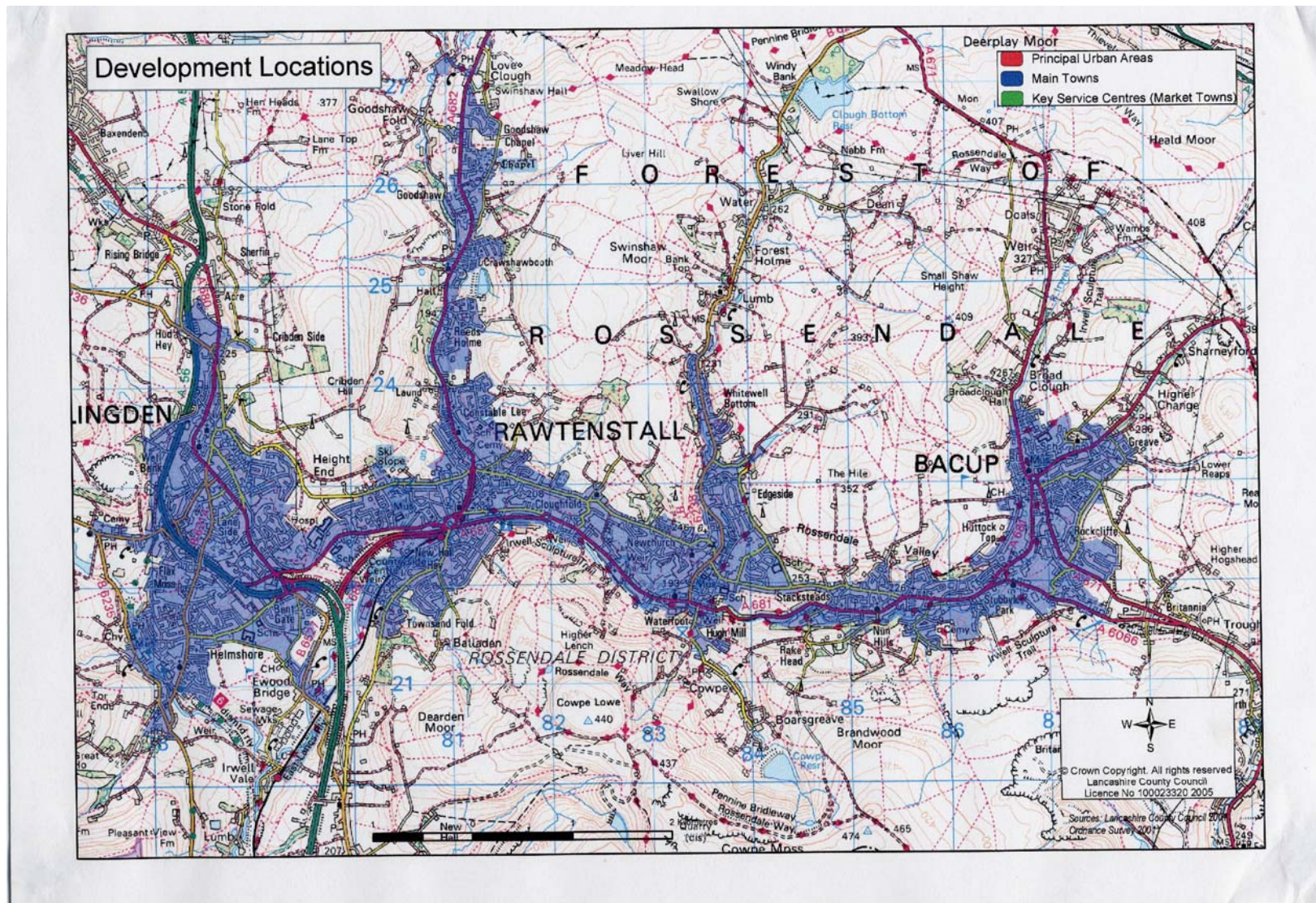
The emerging timescale is for the Council to adopt a Core Strategy in November 2008 and an Allocations DPD in April 2010.

Appendix A: Affordable Housing Contributions under exception

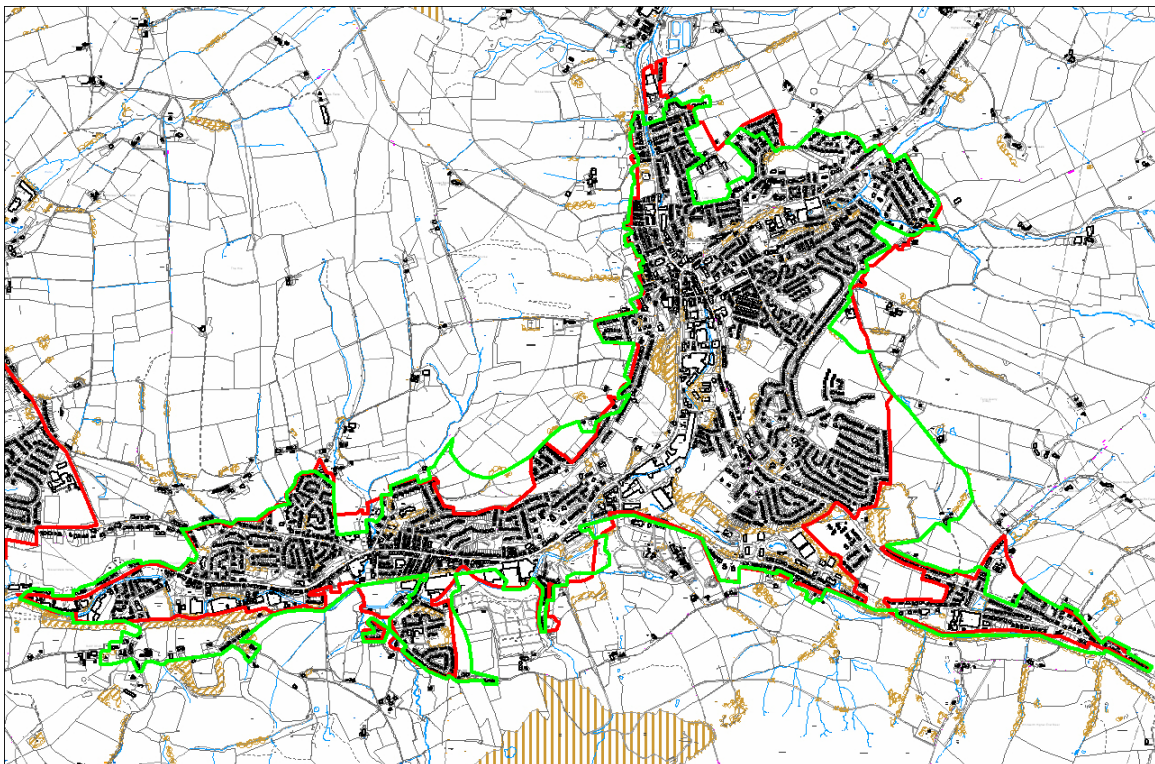
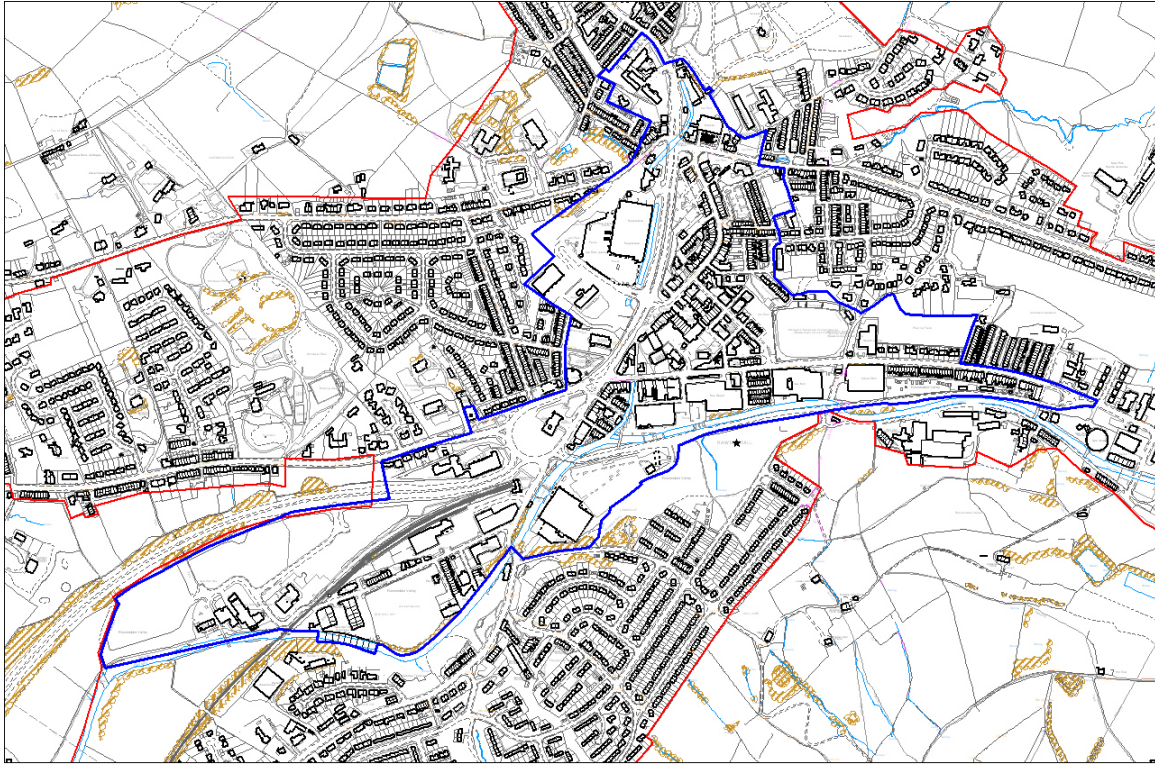
Dwellings	Affordable Housing Requirement	%	Dwellings	Affordable Housing Requirement	%
1	None	0	11	5	45.5%
2	1	50%	12	5	41.7%
3	1	33.3%	13	6	46.2%
4	2	50%	14	6	42.9%
5	2	40%	15	7	46.7%
6	3	50%	16	7	43.8%
7	3	42.8%	17	8	47.1%
8	4	50%	18	8	44.4%
9	4	44.4%	19	9	47.4%
10	4	40%	20	9	45%

Nb: requirements are the nearest whole number to achieving 45% affordable

Appendix B Geographical Scope of Main Development Location



Appendix C: Rawtenstall Town Centre and Elevate Pathfinder Area



Appendix D: Structure Plan Policy 12

housing provision

6.3 FUTURE DEVELOPMENT NEEDS

policy 12

HOUSING PROVISION

PROVISION WILL BE MADE FOR THE FOLLOWING NUMBER OF NEW DWELLINGS FOR NEW HOUSEHOLDS IN THE PERIOD 2001 TO 2016.

	NEW DWELLINGS	ANNUAL AVERAGE DWELLING PROVISION	
	2001-16	2001-06	2006-16
EAST LANCASHIRE	12,500	1,090	705
BLACKBURN WITH DARWEN	3,730	240	255
HYNDBURN	1,850	110	130
RIBBLE VALLEY	1,600	155	80
ROSSENDALE	1,920	220	80
BURNLEY	1,430	130	80
PENDLE	1,970	235	80
NORTH LANCASHIRE	13,670	900	915
LANCASTER	5,120	380	320
BLACKPOOL	3,230	175	235
FYLDE	2,320	155	155
WYRE	3,000	190	205
CENTRAL LANCASHIRE	15,390	1,560	760
PRESTON	4,200	480	180
CHORLEY	4,710	485	230
SOUTH RIBBLE	3,090	290	165
WEST LANCASHIRE	3,390	305	185
LANCASHIRE TOTAL	41,560	3,550	2,380

OTHER ADDITIONAL DWELLINGS MAY BE REQUIRED TO REPLACE THOSE CLEARED IN THE PLAN PERIOD.

IN EACH DISTRICT, PRIORITY WILL BE GIVEN TO THE RE-USE OR CONVERSION OF EXISTING BUILDINGS, AND THEN THE USE OF PREVIOUSLY DEVELOPED LAND AT LOCATIONS LISTED IN POLICIES 2, 3 AND 4 IN PREFERENCE TO GREENFIELD LAND.



housing provision

6.3.1

Between 2001 and 2016, the number of households is expected to grow by 47,000. More people are living longer and living alone, and there is the impact of divorce and separation. However, the rate of increase will be less than in the past. This will be partly due to fewer people moving into the County from Greater Manchester and Merseyside. This will mainly affect Central Lancashire. This will be counterbalanced by the aspiration to retain young and skilled workers who would otherwise leave the County. The Plan assumes no outward migration over the longer term. This mainly affects East Lancashire.

6.3.2

There are also other housing needs, including the issue of 70,000 unfit dwellings. Housing renewal will involve improvements to some housing and demolition of the worst and most unpopular. Not all cleared housing will need replacing, especially in areas of low demand with large numbers of empty properties. Those that do need replacing are additional to the numbers specified in Policy 12. The general principles for locating any replacement dwellings are set out in Policy 13.



The strategy for meeting future needs

6.3.3

Housing is the biggest user of land. Household growth has been the main cause of greenfield development in the past. Future housing needs must be met, yet public opinion is against greenfield development.



The Parks, Bare Lane, Morecambe commended for Best Urban Regeneration Project by the Royal Town Planning Institute in 2001.



6.3.4

The strategy addresses these two conflicting themes by:

- Making maximum use of the existing housing stock. There is potential for at least 6,000 currently vacant dwellings being used to meet some of the future housing needs. This would reduce the County vacancy rate from 4.6% (2001) to 3.5% (2016). This improved use of the existing stock is included in Table 1 and taken account of in Policy 12. Local Plans/Local Development Frameworks do not need to re-examine this component of housing supply.
- Increasing the amount of housing provided on brownfield sites from the 50% of recent years to at least 70%. The Lancashire Housing Study (2001) revealed how much brownfield land there is in the County. Some of this already has planning permission for housing. Some of the remainder will be used for housing development.
- Making maximum use of greenfield sites that already have planning permission.
- Achieving higher densities on housing sites than has typically been the case in the past. Current developments average out at 24 dwellings per hectare. Raising this to a minimum 30 dwellings (50 dwellings at sites with good public transport) will save land.

6.3.5

The various contributions to meeting future housing needs are shown in Table 1. The priority given to making better use of the housing stock, brownfield sites and higher densities will save considerable amounts of greenfield land from development, about 480 hectares in total, or about 35 hectares per District on average over the period of the Plan.

6.3.6

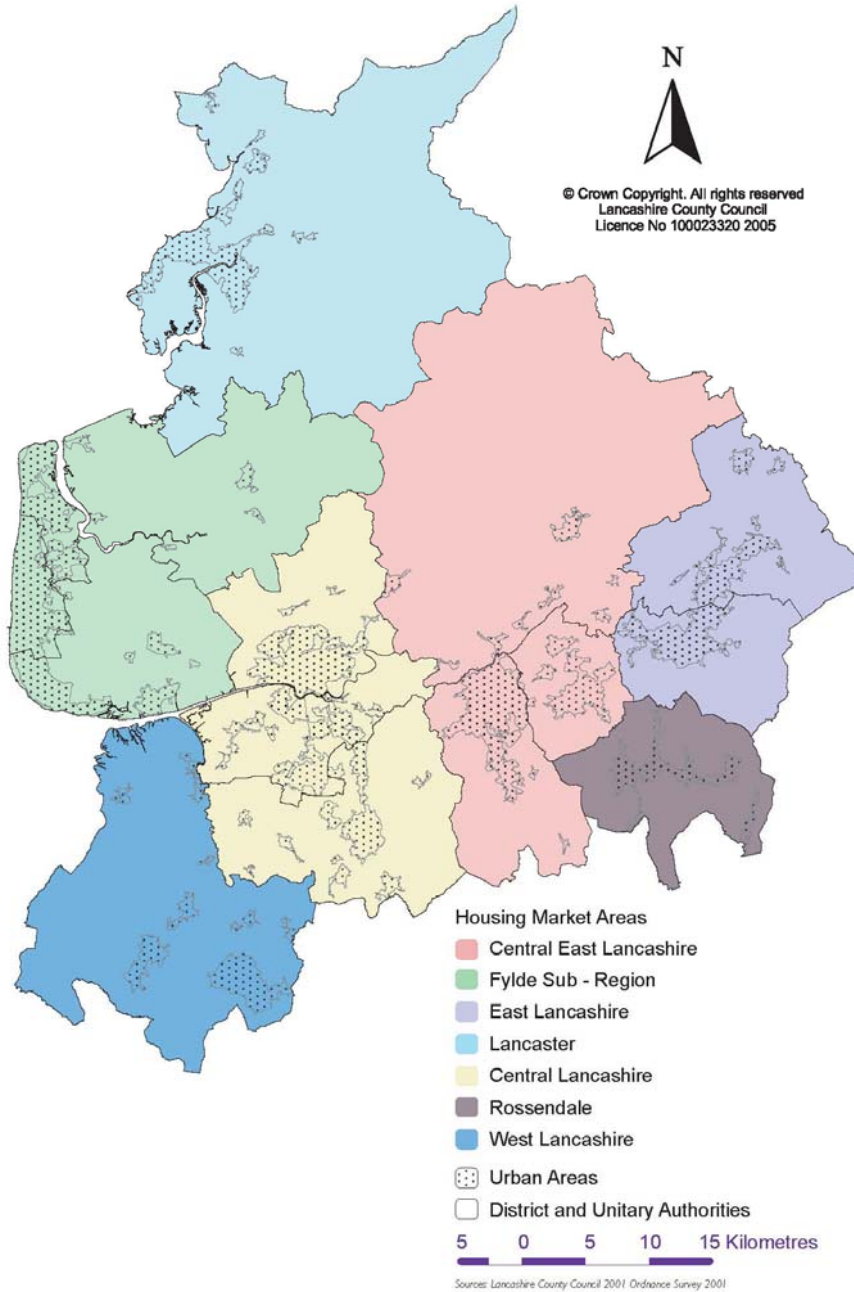
The District housing requirements in Policy 12 do not solely reflect the housing needs generated by each District's residents. They also reflect the distribution of brownfield sites within each housing market area. These areas are shown on Map 10. Housing market areas are generally broader than Districts and represent the areas within which people live and work and are willing to look for housing yet still live reasonably close to their place of work or where they live now. This approach means that brownfield sites just across a District boundary can be utilised in preference to greenfield sites in a District which might have considerable housing pressures relative to the local brownfield supply.



Table 1: Forecast of Household Change, Dwelling Requirement and Components of Supply, Lancashire, Housing Market areas and districts

HOUSING MARKET AREA/ District	Household Change 2001-2016	Dwelling Requirement for Household Change	Existing Stock (Reoccupied Vacancies)	New Dwellings Provision 2001-2016	New Dwellings Provision for Household Change provided through:						Brownfield Contribution to New Dwellings
					Existing Greenfield Permissions	Existing Large Brownfield Planning Permissions	Additional Brownfield Contribution Provision	Additional Greenfields	Brownfield Contribution to New Dwellings		
Blackburn	4,290	4,380	650	3,730	920	640	2,170	0	0	75%	
Hyndburn	2,440	2,490	640	1,850	210	380	1,260	0	0	88%	
Ribble Valley	1,870	1,910	310	1,600	240	630	730	0	0	85%	
CENTRAL EAST LANCASHIRE	8,600	8,780	1,600	7,180	1,370	1,650	4,160	0	0	81%	
Burnley	2,100	2,140	710	1,430	120	60	1,250	0	0	92%	
Pendle	2,960	3,020	1,050	1,970	470	290	1,210	0	0	76%	
EAST LANCASHIRE	5,060	5,160	1,760	3,400	590	350	2,460	0	0	83%	
Rossendale	1,900	1,940	20	1,920	810	570	540	0	0	59%	
Blackpool	3,170	3,230	0	3,230	540	250	2,440	0	0	83%	
Fylde	2,760	2,820	500	2,320	260	320	1,740	0	0	89%	
Wyre	3,060	3,120	120	3,000	1,240	170	1,590	0	0	59%	
FYLDE SUB-REGION	8,990	9,170	620	8,550	2,040	740	5,770	0	0	76%	
Lancaster	6,290	6,420	1,300	5,120	920	560	3,640	0	0	82%	
Chorley	4,620	4,770	0	4,770	2,190	1,820	700	0	0	54%	
Preston	5,040	5,140	940	4,200	1,840	860	1,120	380	0	47%	
South Ribble	3,030	3,090	0	3,090	1,010	930	1,150	0	0	67%	
CENTRAL LANCASHIRE	12,680	12,940	940	12,000	5,040	3,610	2,970	380	0	55%	
West Lancashire	3,320	3,390	0	3,390	600	400	1,660	730	0	61%	
COUNTY TOTAL	46,850	47,800	6,240	41,560	11,370	7,880	21,200	1,110	0	70%	

map 10 housing market areas



Provision for affordable housing needs

6.3.7

The availability of affordable housing may be an important consideration in some parts of urban and rural Lancashire. There may be instances of lack of affordability in some localities, where demand for holiday, retirement or commuter homes makes the cost of housing prohibitive to those on lower incomes. The availability of good quality affordable housing may also be problematic in areas where the existing stock is poorly-maintained or substandard.

6.3.8

The need for affordable housing provision, the amount and its location, will be identified by District local authorities as part of their assessment of housing need. The implications for affordable housing provision should be reflected in local housing strategies and Local Plan/Local Development Framework policies. It is important that, as well as considering new housing provision, Districts consider how they might better utilise the existing stock to meet existing and future household needs.

Table 2: Comparing Rates of Housing Provision between 1996 and 2016

District/ Housing Market Area	Housing Completions 1996-2001	Annualised Average Rates Future Housing Provision	
		2001-2006	2006-2016
Blackburn with Darwen	350	240	255
Hyndburn	260	110	130
Ribble Valley	275	155	80
CENTRAL EAST LANCASHIRE	890	505	465
Rossendale	175	220	80
Burnley	220	130	80
Pendle	140	235	80
EAST LANCASHIRE	360	370	160
Preston	500	480	180
Chorley	470	485	230
South Ribble	480	290	165
CENTRAL LANCASHIRE	1,450	1,250	575
West Lancashire	380	310	185
Blackpool	305	175	235
Fylde	285	155	155
Wyre	355	190	205
FYLDE SUB-REGION	945	520	595
Lancaster	435	380	320
LANCASHIRE	4,635	3,550	2,380

Note: All housing figures exclude clearance replacement housing. Totals may not add due to rounding.



Managing the Release of Land and Brownfield Targets

6.3.9

The Plan recognises that current trends in migration are likely to continue in the short-term. Thereafter it is assumed that there is a match between inward and outward movement in most areas. The distribution and take-up of future housing land will also be influenced, in the short-term, by distribution of current housing approvals (planning permissions).

6.3.10

Policy 12 therefore indicates annual average rates of new housing provision for 2001-6 and 2006-16. Table 2 compares future provision, short-term and long-term, with recent trends. These annual provision rates are important for managing the release of land and moving to a situation where the land supply is gradually and consistently reduced and matches Lancashire's requirements. The overall housing provision for 2001-2016 for each District set out in Policy 12, including the equivalent provision for each of the periods 2001-6 and 2006-16, represents the optimum distribution between Districts according to the spatial development framework and housing provision set out in Regional Spatial Strategy, and should be regarded as maximum requirements.

6.3.11

It is important that land supply is managed so that the transitional phase (2001-2006) quickly moves to the situation where land release closely matches Lancashire's own housing requirements. Districts will therefore, in the short-term, need to manage their land resources so that priority is consistently given to brownfield over greenfield sites within the context of the annual provision figure for 2001-06 set out in Policy 12. In the longer term the lower annual provision figure for 2006-16 will apply.

6.3.12

One of the key elements of the development strategy is to maximise the reuse of brownfield land. Districts that include safeguarded greenfield land policies in their Local Plans/Local Development Frameworks should make clear that the development of such land must have lower priority than brownfield land included within areas of urban regeneration.

6.3.13

Policy 12 sets out future new dwelling requirements for all sections of the community including those requiring affordable housing. In most Districts there are currently sufficient sites with residential planning permission to meet at least the short-term housing provision set by Policy 12, and often for much longer. However this tends to be dominated by proposals for market housing, with only very limited numbers of dwellings approved to meet local affordable housing needs. Under the normal operation of Policy 12 (as described in the text box on page 51), current levels of oversupply affecting many areas of Lancashire could



preclude the necessary provision of affordable houses. Where there is a significant oversupply of housing permissions, planning applications for further residential development may not be approved unless they make an essential contribution to the supply of affordable or special needs housing or form a key element within a mixed use regeneration project. Any such project should be compatible with, and help achieve, the regeneration objectives of the Local Authority. Districts may identify, through the Local Plan/Local Development Framework process, other circumstances where it may be appropriate to approve residential development in a situation of housing oversupply, such as the conservation benefits of maintaining an existing building worthy of retention.

6.3.14

Throughout the Plan period achieving the brownfield target will be an important consideration for each District. Proposals for new housing development should therefore be considered according to the search sequence, set down in Regional Spatial Strategy, that prioritises the re-use or conversion of existing buildings within urban areas, followed by the use of previously developed land, before allowing the development of previously undeveloped land. The net additional housing provided through the re-use of conversion of suitable buildings, including through the sub-division of existing dwellings, and on previously developed land will count towards each District's brownfield target.

6.3.15

Each target in Target 12.1 covers the Plan period as a whole and may not be necessarily achieved year on year. Frequent monitoring will be important. Major or consistent deviations in the short

and medium-term would mean that the target would be unlikely to be met and particularly if there were no clear movement towards the target rate by the middle of the Plan period.

6.3.16

There is currently a considerable supply of sites suitable for residential development, including some land formerly allocated for business and industrial use. This means that it is unnecessary in the short to medium-term to bring forward further business and industrial land for housing development. The best sites for business and industrial development should be identified in Local Plans/Local Development Frameworks following consultation and protected for these uses through development control procedures. Local Plans/Local Development Frameworks should also respond to significant regeneration initiatives which may call for some local restructuring of land use distribution.



Calculating new housing requirements

In assessing the requirement for new housing provision, either for the purposes of Local Plan/Local Development Framework preparation or the determination of applications for residential development, the following approach should be taken;

- The requirement for new housing allocations/approvals should consider the annual rate of provision within the particular phase of the Plan period. Districts should aim to meet the annual housing provision on a yearly basis as closely as possible.
- In reviewing and rolling forward Local Plans/Local Development Frameworks, the amount of land required for housing will be determined by reference to the future annual provision in Policy 12. PPG3 (March 2000) explains that sufficient sites should be shown in the Local Plan/Local Development Framework to meet at least the first five years' housing requirement. This does not mean that all need to have the benefit of planning permission at the start of a five year period. PPG3 explains that by managing their release, sites can be held back until required.
- For the period 2006-2016, it is expected that Local Plans/Local Development Frameworks will have set in place a detailed approach for the release of sites for housing development, and that this will indicate the necessary housing numbers to come forward in the period of the Local Plan/Local Development Framework. It is important that the housing provision achieved in the early phase (2001-2006) informs any necessary adjustment to the District annual housing provision for the subsequent period beyond 2006.
- The need, or otherwise, to grant planning permission for a housing development will be determined by reference to the oversupply or undersupply of housing permissions in the context of Policy 12. Most Districts are in a situation of oversupply with planning permissions far exceeding the annual requirement. This is likely to be the case in most areas for a number of years. A District will move to a situation of undersupply, requiring the granting of further planning permissions, when the expected annual number of completions that is estimated will arise from existing planning permissions is below the annual requirement set out in Policy 12.
- The ability of current housing approvals and other planned housing land shown in a Local Plan/Local Development Framework to satisfy the annual provision figures will indicate whether additional sites should or should not be approved at that point in time. Developing a robust understanding of the number of dwelling completions that a stock of permissions is likely to generate and over what time is an important element of the Plan, monitor and manage approach set out in PPG3.
- However, where the annual housing provision for a particular year or phase is exceeded, possibly because of higher than expected windfall developments, or sooner than anticipated implementation of housing approvals, a consequential adjustment will need to be made to the annual provision to be met in subsequent years.
- This approach emphasises the importance of regular monitoring, at least on an annual basis but preferably more frequently, as a central feature of the approach to managing the release/approval of sites for new housing. The managed release of sites through the granting of planning permissions, in the way described, will also need to be judged against other policies of the development plan, and includes consideration of the sustainability and accessibility of sites brought forward by the market.
- The approach described in this box will be used to implement and achieve the housing provision figures set out in Policy 12 and in Policy UR7 of Regional Spatial Strategy in line with the Plan, monitor and manage approach introduced by PPG3 (March 2000). The overall housing provision for 2001-2016 set out in Policy 12 for each District will represent the maximum housing provision that should not be exceeded. The fundamental aim in releasing sites, as PPG3 explains, should be to ensure that no more land is used for housing development than is necessary.

Policy 13 provides an explanation of the approach to assessing and monitoring losses and gains to the housing stock through housing clearance and provision of replacement dwellings.

Sub-Regional Perspectives

Central Lancashire

6.3.17

The issue continues to be to manage growth and the pressure for greenfield development in this sub-region which enjoys good communications and is readily accessible from adjoining metropolitan areas. The previous Structure Plan set the level of housing development for 1991-2006 below that suggested by previous trends so as to protect the green belts and other open areas and to provide a better strategic balance between housing and employment provision across the sub-region.

6.3.18

The level of provision for 2001-16 continues these objectives together with the priority given to brownfield re-use and attaining regional objectives: development above the rates specified in Policy 12 would lead to unnecessary greenfield development and would draw in commuters from Greater Manchester and Merseyside.

6.3.19

In Preston, there is only a limited need for greenfield development beyond existing planning permissions. A small amount may be required in West Lancashire District at Skelmersdale because of the very limited brownfield capacity in the former new town. Policy 12 requires the provision the 3,390 dwellings over the Plan period in West Lancashire District. Of this total, at least 850 should be located at Skelmersdale in order to assist its regeneration.

North Lancashire

6.3.20

Blackpool, Fylde and Wyre Districts together form a single housing market. For many years, additional housing needs in this housing market have been almost wholly generated by migrants moving into the area. Some net inward migration will continue into the Fylde housing market, albeit at more modest levels than in recent years. This will support the regeneration of the coastal towns. Economic and physical regeneration of the coastal communities is a prime objective. This is reflected in the high brownfield targets set for these Districts. This includes the recycling and renovation of existing buildings. There is no requirement for additional greenfield sites beyond existing planning permissions.

6.3.21

Lancaster is one of the most self-contained Districts in the County with relatively little interaction with neighbouring areas in Lancashire. Future housing needs can be met within the identified supply, from existing housing stock and from existing planning permissions and additional brownfield opportunities. There is no need for additional greenfield sites beyond existing permissions.

East Lancashire

6.3.22

The issue is to reverse past decline. A large proportion of the stock is unfit. Many areas are characterised by large numbers of vacant properties and very low prices. Much new development in the past has been at the periphery of towns, away from the inner urban communities. Elevate's strategy for East Lancashire seeks to concentrate new housing development within or close to town centres. It is essential that local planning authorities, when preparing Local Plans/Local Development Frameworks, focus new housing development in the short to medium-term onto urban regeneration locations and away from peripheral locations.

6.3.23

The strategy aims to stimulate the market by reducing outward migration and improving job prospects (thereby raising housing demand) at the same time as restricting greenfield development and clearing vacant dwellings in areas of low demand (thereby reducing supply). A better balance between supply and demand will raise property values and make it worthwhile for owners to invest in and refurbish the housing stock.

6.3.24

The emphasis will be on urban regeneration with high brownfield targets. No additional greenfield sites beyond existing permissions will be required. This needs to be rigorously applied across all East Lancashire Districts as surplus greenfield housing in each District would draw in population from adjoining Districts and short circuit their regeneration efforts.

TARGET 12.1:

At least 70% of new dwellings in Lancashire to be on previously developed land including re-use or conversion of buildings, 2001-2016, comprising the following targets for each District Council:

Blackburn with Darwen	75%
Blackpool	80%
Burnley	90%
Chorley	55%
Fylde	90%
Hyndburn	85%
Lancaster	80%
Pendle	75%
Preston	45%
Ribble Valley	85%
Rossendale	55%
South Ribble	65%
West Lancashire	60%
Wyre	60%

TARGET 12.2:

Reduce the number of vacant houses to a maximum of 3.5% of total stock by 2016.

TARGET 12.3:

Annual average number of new dwellings for new households of 2,380 in 2006-2016 (compared with 4,635 in 1996-2001).

TARGET 12.4:

Housing sites to be developed at a minimum density of 30 dwellings per hectare, rising to at least 50 dwellings per hectare at sites with good public transport, 2001-2016.



Appendix E: Revised Interim Housing Position Statement (January 2007) Consultation Responses

Ref	Body / Organisation	Representation	Responses	Changes
PSR/01	United Utilities PLC	No Comment	None required	None
PRR / O2	Sport England	Draft statement does not accord with the JLSP (Joint Lancashire Structure Plan) nor assist in achieving set dwelling targets. Due to housing over-supply with extant permissions a moratorium against further planning commitments is not advanced in favour of maintaining regeneration.	<p>The interim policy is underpinned by the housing figures contained within JLSP policy 12; with the housing supply explained in the context of these figures. The policy functions to ensure that these set dwelling targets are achieved in the Borough. Further clarification will be provided in terms of the most up to date land supply situation.</p> <p>The interim policy is being pursued to enable the Council to plan, monitor and manage the release of housing land in accordance with housing figures in the Joint Structure Plan. Without such a policy, there is a concern that the figures in the development plan will be greatly exceeded, compromising sustainable development in the Borough and prejudicing the proper planning of new employment, services and infrastructure.</p> <p>It is not the purpose of the policy to stifle regeneration in the Borough, and therefore a number of exceptions are proposed.</p>	Include further quantitative information of the current residential land supply
	Sport England	Potential conflict could arise with other planning policies where the statement would accept housing proposals	It is noted that the interim policy should clarify that any application that fulfils one of the criteria must still satisfy normal development	Add supplementary text after the development criteria to provide

Ref	Body / Organisation	Representation	Responses	Changes
		<p>unreservedly, in five types of situation, without qualification, for example subsection d) accepts conversion or change of use of building to residential use without consideration as to whether evidence exists that the existing use is surplus to requirements, or whether there is a need to retain the existing use.</p> <p>Qualification is required.</p>	<p>considerations and development plan policies.</p>	<p>qualification:</p> <p><i>It is however stressed that even if sites meet the terms of the interim policy outlined below, they must also meet all other planning requirements to be acceptable for development. These requirements include assessments of flood risk and transport impact, as well as the need to conform with development plan policies covering wildlife, historical, archaeological and other impacts of development.</i></p>
PSR / 03	The Theatres Trust	No Comments	No required	None
PSR / 04	Harvest Housing	West View, Haslingden site (owned by Harvest) falls outside the AAP (Area Action Plan) boundaries, however to achieve affordable housing figures as per the HMNA (Housing Market Needs Assessment), the site is a key aspect.	The benefits of such developments – comprising solely affordable housing – are noted and will be reflected in the Revised Policy.	Agree that the policy should include an exception policy for developments comprising solely affordable or special

Ref	Body / Organisation	Representation	Responses	Changes
		The site is in a sustainable location, closely linked to the key service centre of Haslingden, the land is brownfield, formerly the site of housing association flats and has been unoccupied for five years. There is the opportunity to gain support from the Housing Corporation in terms of funding for land owned by RSLs' (Registered Social Landlord). Policy should make reference to and accept applications for residential schemes of 100% affordable housing that lie outside AAP areas.		needs housing.
PSR / 05	Hurstwood Group	Thanks the council for consulting the Hurstwood Group. Revised HPS (Housing Position Statement) allows more housing in AAP areas, in regeneration terms this is clearly acceptable and necessary.	Support welcomed	None
	Hurstwood Group	Many sites within AAP areas have planning permission without any PPS 3 (Planning Policy Statement) affordable housing. The Valley Centre is to be considered for housing development, but is not intended to include affordable housing on site due to commercial viability issues. Notes the Council is involved in this application and has a vested interest as a part landowner.	It is noted that due to the oversupply in residential dwellings, proposals should only be acceptable where they provide essential affordable housing. Where this is not the case there is no requirement for the market housing to be provided - unless it makes an essential contribution to the Council's regeneration objectives. Further information is included within the affordable housing consultation responses.	None

Ref	Body / Organisation	Representation	Responses	Changes
	Hurstwood Group	Revised policies need to assess the potential of available sites in AAP areas to deliver affordable housing hence the Council will need to consider widening its exceptions to the over-supply position to include allowing new build development on sustainable and accessible urban sites outside the AAP area. Supports further exceptions to allow conversions in main urban areas up to 4 units, there would be merit in increasing this number up to 20 so that beyond 15, an element of affordable housing can be provided.	The supplementary text to policy 12 states that where there is a significant over supply of housing permissions (as outlined in the interim policy), planning applications may not be approved unless they make an essential contribution to the supply of affordable or special needs housing or regeneration objectives. The interim policies have been created to enable the Council to plan, monitor and manage the release of housing land. Whilst extending the exceptions to the interim policy could lead to further provision of affordable housing, this could also dramatically increase the supply of market housing – restrict the ability of the Council to satisfy JLSP policy 12. Therefore having an exception policy specifically relating to affordable housing developments and only allowing developments with a high proportion of affordable housing is seen as the best way of balancing the two objectives.	Include exception criteria for development that is solely affordable or special needs housing.
	Hurstwood Group	There are a number of sites in Rossendale that are derelict/vacant/ poor in appearance and blight the lives of nearby residents, the Council should include a further exception to deal with these sites	It is acknowledged that a number of derelict / vacant / poor sites exist outside of the Rawtenstall town centre or Bacup, Stacksteads and Britannia pathfinder. However, in order to plan, monitor and manage housing supply the interim policy must restrict new housing permissions and as such regeneration priority areas have been targeted. These pdl sites remain a key	Clarify where development will be acceptable on previously developed land.

Ref	Body / Organisation	Representation	Responses	Changes
			source of housing potential in the longer term. Furthermore, development will be allowed in these areas if the proposals make an essential contribution to provision of affordable housing.	
PSR / 06	Lancashire County Council	To accord with paragraph 6.1.13 of the Explanatory Memorandum of the adopted JLSP 2001-2016, criteria for the provision of housing which make an essential contribution to the supply of affordable or special needs housing or forms a key element within a mixed use regeneration project; that is compatible with and helps to achieve the regeneration objectives of Rossendale B.C should be added.	Noted that the supplementary text to policy 12 outlines proposals that should be supported in situations in of housing over-supply. The criteria in this interim policy are intended to deliver this paragraph. It also states that LPAs may identify, through the Local Plan / LDF process, other circumstances where it may be appropriate to approve residential development in a situation of housing oversupply, such as the conservation benefits of maintaining an existing building worthy of retention. Prior to the adopted of the LDF, this interim policy is intended to outline the “other circumstances” where is may be appropriate to approve residential development.	In order to deliver the requirements of policy 12: Add exception criteria for solely affordable / special needs housing. Add housing that forms a key element within a mixed-use regeneration project; that helps to achieve the Borough’s regeneration objectives.
PSR / 07	Turley Associates on behalf of Clifford Developments	Supports the fact that the HPS allows for residential development where the proposal is on previously developed land and lies within and will deliver regeneration benefits within the Regeneration Priority Areas.	Support welcomed	None
	Turley Associates on behalf of	PPS 3 paragraph 53 states that Local Planning Authorities should identify a 15-year supply of housing. Local Planning	Para 53 states that Local Development Documents (my emphasis) should identify such a land supply. This will be achieved at	The revised policy statement will identify the Councils current

Ref	Body / Organisation	Representation	Responses	Changes
	Clifford Developments	Authorities should also ensure a continuing/ rolling 5 year supply of deliverable sites throughout the 15 year framework	the Council progresses its LDF, primarily through its Allocation DPD (allocations will be derived in light of the existing land supply situation and required to satisfy the Regional Spatial Strategy). In the context of the current development plan figures; the Borough has well in excess of a 5-year supply of housing land.	housing supply (in terms of the number of years supply).
	Turley Associates on behalf of Clifford Developments	<p>In circumstances where Regional Spatial Strategies are in development, Local Planning Authorities should also have regard to the level of housing provision as proposed in the emerging Regional Spatial Strategy. Justification section of HPS should make reference to the emerging Regional Spatial Strategy and provide an indication of how the housing requirements in Rossendale may be affected by revisions to the housing figures contained therein.</p> <p>Draft Regional Spatial Strategy recommends 222 units per year net clearance are to be added to Rossendale's housing stock, a significant increase from the 128 units per year average set by the Joint Lancashire Structure Plan over the periods 2001-2016. By 2016 Rossendale will be looking at a deficit of 1030 units according to draft</p>	<p>The purpose of the interim policy is to plan, monitor and manage housing land in the context of the existing development plan (i.e. the Joint Structure Plan). Whilst the figures in the Regional Spatial Strategy are acknowledged within the document, they carry less weight than existing, adopted development plan policies.</p> <p>The figures within the RSS, once adopted, will underpin the LDF. However this policy will act as an interim measure, until the Council is able to pursue a plan led approach to accommodate new development anticipated as part of the LDF.</p> <p>PINS guidance note - When assessing 5 year supply – should use existing development plans (my emphasis)...therefore the purpose of the interim policy is not to explain land supply under the emerging RSS, but rather to ensure a plan led approach to housing supply</p>	The revised document will include reference to RSS figures.

Ref	Body / Organisation	Representation	Responses	Changes
		RSS figures if housing is restricted as proposed and does not consider the requirement after 2016 (when the JLSP expires) to 2021. Therefore the Housing Position Statement is clearly contrary to recently published national policy PPS 3.	(allocations, urban capacity sites etc) under the LDF and that this is not undermined in the short term by failure to comply with Structure Plan Policy 12. Furthermore the interim policy is not a complete moratorium on development and will lead to further increases in supply.	
PSR / 08	Natural England	No comment	None required	None
PSR / 09	Friends, Families and Travellers	The needs of Gypsies and Travellers are not mentioned in view of the apparent needs for provision. Department for Communities and Local Government caravan figures indicate a need for transit provision and the forthcoming GTAA (Gypsies and Traveller Accommodation Assessment) should enable any need for permanent provision. Social Landlords Order 2006 permit RSLs' to set up and manage Gypsy and Traveller sites and to receive grants from the Gypsy and Traveller Sites Grant and Housing Corporation. Housing Act 2004 requires Local Authorities to include the accommodation needs of Gypsies and Travellers and have a strategy in place to identify how any needs will be met as part of their wider housing strategies.	Interim Policy is designed to elaborate on development plan housing figures contained within the Joint Structure Plan Policy 12. This specifically refers to the number of new dwellings (my emphasis) for new household in the period 2001 – 2016. Travellers site do not fall within the scope of policy 12.	None
PSR / 10	National Trust	Once the Draft RSS (Regional Spatial Strategy) is adopted, it will be necessary to review the IHS (Interim Housing	Agreed. The interim policy is intended to manage the release of housing land in the short term, prior to the adoption of the RSS	Make the next steps more transparent – in terms of withdrawal of

Ref	Body / Organisation	Representation	Responses	Changes
		Statement) and relevant LDDs' (Local Development Documents) in light of the changes to housing requirements for the Borough. It would be helpful for the IHS to be explicit about a future review.	and progress with the Borough's LDF.	Interim Policy upon progression of the Regional Spatial Strategy / Local Development Framework.
PSR / 11	North West Regional Assembly	<p>The adopted RSS Regional Planning Guidance for the North West (RPG 13) now forms an integral part of the development plan and should be given due consideration in the production of policy documents. The Submitted Draft Regional Spatial Strategy is now some way progressed in the process towards its adoption; it also should be given some consideration when forming new policy documents.</p> <p>Figures in the interim policy appear broadly in accordance with the structure plan and adopted RSS (RPG 13), however the Submitted Draft RSS has proposed higher housing figures for the region which will need to be taken into consideration on adoption.</p>	<p>The Joint Lancs Structure Plan (which underpins the housing targets in the interim policy) is in conformity with the adopted RSS Regional Planning Guidance for the North West.</p> <p>The primary purpose of the policy statement is to assist in the achievement of existing adopted development plan policy H12 (structure plan), as the figures in the RSS could still be subject to alteration. In the interim, housing applications will continue to be primarily assessed against the existing development plan – including policy H12.</p>	For information, the revised document will draw more clearly on the emerging RSS and its implications for housing supply.
	North West Regional Assembly	Satisfied that the criteria for assessing planning applications is broadly acceptable in terms of regional policy, as a complete moratorium on new permissions may not be in the best	Agree that a total moratorium would be unacceptable. The purpose of the interim policy is not to stop residential development, but to manage the release of housing land in accordance with policy 12 of the JLSP.	None

Ref	Body / Organisation	Representation	Responses	Changes
		interests of regeneration in Rossendale.		
PRS / 12	Taylor Young on behalf of B & E Boys Ltd	Welcomes the additions that have been made to the circumstances when residential development will be acceptable	Support welcomed	None
	Taylor Young on behalf of B & E Boys Ltd	Criteria (c) falls short of permitting residential development associated with conservation of important historic buildings outside conservation areas. There are important historic buildings, outside conservation areas that are not listed and would also benefit from residential development to secure their future, for example there a number of historic mills within the Borough. Such accommodation is now often redundant, unviable and unusable for employment uses. Therefore residential development may be the only viable option to retain such buildings. Therefore it is considered that important buildings outside of conservation areas should also be included within criteria (c).	If the building is not listed or located within a conservation area then there is a concern over how “conservation importance” is defined. In such circumstances, proposals will only be deemed acceptable where the applicant has clearly demonstrated that they are important historic buildings and that residential development may be the only viable option to retain such buildings.	Broaden scope of policy to include the conservation of important historic buildings outside of conservation areas. This will only be permissible where clearly justified.
	Taylor Young on behalf of B & E Boys Ltd	Within criteria (e) reference is made to “Priority Regeneration Areas”. Clarification is needed on what a “Priority Regeneration Area” is, and where they are; as the JLSP 2001-2016 identifies the whole of Rossendale as a “Regeneration Priority Area”; and the emerging Core	Agree that further clarity is required as the geographical limits of some criteria. The boundaries correlate to the Housing Market Renewal Area plus Rawtenstall Town Centre AAP. As noted in the representation, the belief is that this approach will enable residential development to support the	A plan will be included within the reviewed interim policy.

Ref	Body / Organisation	Representation	Responses	Changes
		<p>Strategy for Rossendale identifies the whole of Rawtenstall town centre and the Bacup, Stacksteads and Britannia Pathfinder as “Regeneration Priority Areas” (Proposed policy DS: 3 Regeneration Priority Areas). Therefore it could be interpreted that any site within Rawtenstall town centre and HMR area, alongside a proposal, which delivers regeneration benefits, will meet this criterion; if this is the case, this is supported. However it is essential this be clarified. If “Priority Regeneration Areas” is making reference to cluster areas as identified in the emerging AAP (Area Action Plan), this is a concern. The cluster areas in the Bacup, Stacksteads and Britannia AAP are unexplained and importantly, they are significantly inconsistent between documents. Therefore it is essential that the location of Priority Regeneration Areas are clearly identified on a plan, to be attached to the Revised Interim Housing Position Statement.</p>	<p>regeneration of the town centre, and also contribution towards housing type and choice in the HMR.</p>	
	Taylor Young on behalf of B & E Boys Ltd	<p>Basing decisions on emerging AAP documents which have not yet undergone the full consultation process is also questioned.</p>	<p>The interim policy is not based on emerging AAP documents, rather derived from the requirement to manage the release of housing land in accordance with Policy 12 of the Structure Plan.</p>	None

Ref	Body / Organisation	Representation	Responses	Changes
PSR / 13	Planning Sense	The HPS suggests it provides information on the current status of housing provision in Rossendale; in fact it addresses residential development, not housing; it proposes a radical, new policy, not a position statement. The importance of this proposed residential development policy has been obscured by its misleading title.	It is noted that the status / purpose of the interim policy is unclear and that reference to “position statement” could be misleading.	Change title to clarify that the document goes beyond the scope of being a position statement.
	Planning Sense	Is it to become part of the Development Plan? Is it an SPD (Supplementary Planning Document)? Was it proposed by the LDS (Local Development Scheme)? Has it been subject to a Sustainability Appraisal? Has consultation accorded with the SCI (Statement of Community Involvement)?	The contents of the Interim Policy are supplementary to policy 12 of the Joint Lancs Structure Plan. Whilst the Council could have pursued the document as a SPD, this was rejected for a number of key reasons. Firstly, by the time the document had been adopted, new housing figures in the RSS are likely to have been published – undermining its long term usefulness and making it a questionable use of Council resources to pursue as an SPD. Moreover, this would still leave an immediate gap in terms of advice to developers of the Council’s requirements to plan, monitor and manage the release of housing land in accordance with policy 12 of the Structure Plan. Because it is not part of the LDF, there were no statutory consultation requirements. However, the Council has undertaken a number of consultation exercises of the policy statement, appreciating the importance of this issue.	Clarify the status of the interim policy in the revised document.

Ref	Body / Organisation	Representation	Responses	Changes
	Planning Sense	The statement proposes to outweigh Development Plan policies; clearly ultra vires, as Section 54a advises that in dealing with planning applications, the local authority must have regard to the provisions of the development plan	Noted that the interim policy statement in itself does not outweigh existing development plan policies. Clarify that the policy supplements H12 – which is an existing policy that forms part of the development plan. Furthermore, as a response to PPS3, the document is of significant weight in the management of land.	Clarify that the interim policy does not outweigh existing development plan policies in the revised policy statement.
	Planning Sense	The statement actually runs contrary to the provisions of the development plan. JLSP policy 12 (paragraph 6.3.13) offers an exception to the strict control of residential commitments to allow residential development to meet special housing needs wherever there is demand. The provision of special needs housing is an established policy of the Councils' Housing Strategy 2005-2008, but the statement would deny the opportunity to deliver such housing.	Noted that the criteria should be expanded to include all of the exceptions mentioned in the supplementary text to policy H12.	Expand exception criteria to cover the supplementary text to policy H12.
	Planning Sense	The statement seeks to direct residential development to the "Regeneration Priority Areas" of Rawtenstall and Bacup, Stacksteads and Britannia. However RSS 13 identifies the whole of East Lancashire as a Regeneration Priority Area. Haslingden is identified as a main development location by JLSP policy 2 and only very recently was identified by the Council for regeneration initiatives	Noted that the document needs to be clear as to the geographical scope of criteria. The intention is to prioritise development in the Housing Market Renewal area.	The document will include a plan; clarifying the scope of the exception policies.

Ref	Body / Organisation	Representation	Responses	Changes
		under the Haslingden Town Centre Plan. Is this no longer the case?		
	Planning Sense	<p>The basic premise of the Bacup, Stacksteads and Britannia HMR (Housing Market Renewal) is one of low demand leading to an oversupply of affordable homes. The Councils' Housing Strategy 2005-2008 identifies "strong demand in the west and northern housing markets of Helmshore, Cribden, Goodshaw and Greenfield". PPS 3 advises that LDDs' should set out a strategy for the planned location of new housing based on evidence of current and future levels of need and demand for housing. Therefore it is inappropriate to direct new residential development to areas of weaker demand and prohibit opportunistic development in sustainable locations, by conversion or redevelopment of brownfield sites in high demand areas of Haslingdon, Helmshore, Edenfield and Rawtenstall.</p> <p>It has been established that weaker demand in Stacksteads and Irwell housing markets, reflects the fact that the east end of the Borough can never be as environmentally, socially or economically sustainable as geographically more favoured areas to the west of the</p>	<p>The policy does not seek to prioritise residential development in Bacup, Stacksteads and Britannia at the expense of other areas. There are a significant number of outstanding planning permissions across other areas of the Borough, which will continue to come forward whilst the Council progresses its LDF. Furthermore the policy does allow for further development in areas of high demand under other criteria – where replacement dwellings, conversions within the urban boundary of the main development location within the borough, for conservation etc. The criteria are derived from the supplementary text to the Structure Plan</p> <p>The purpose of this interim policy is to manage the release of housing land in the short term, so as not to undermine the future spatial plans (such as the Core Strategy) that are being produced and to ensure the new dwelling figures in Policy 12 are met and that appropriate levels of infrastructure, services and employment opportunities are available in the Borough alongside new housing.</p> <p>This can only be achieved through a temporarily more restrictive stance, with</p>	None.

Ref	Body / Organisation	Representation	Responses	Changes
		Borough. PPS 3 advises that LDDs' should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development. It is not sustainable to direct residential development to Bacup, Stacksteads and Britannia.	regeneration areas prioritised in the short term. A more comprehensive strategy for the planned location for new housing under the LDF – Core Strategy and Allocations DPDs.	
	Planning Sense	There is an exception in policies 12 and 13 (JLSP?) for clearance and replacement in the HMR areas. It is therefore unnecessary to offer additional exception to new residential development in Bacup, Stacksteads, and Britannia.	The inclusion of the exception for clearance and replacement in the HMR areas within the interim policy is for clarity and transparency.	None
	Planning Sense	Impose restraint upon residential development in Bacup, Stacksteads and Britannia.	Restraint in Bacup, Stackstead and Britannia would restrict regeneration aims of the Borough – contrary to the objectives the Policy 12.	None
	Planning Sense	Identify Rawtenstall town centre as a focus of sustainable economic regeneration where a quantum of new residential development will support regeneration investment in line with the provisions of JLSP policy 12 and the Rawtenstall AAP.	Residential development in Rawtenstall town centre can still be permitted under a number of the interim policy criteria. A more comprehensive approach will be identified as part of the LDF.	None
	Planning Sense	Allow for residential development in any sustainable location in the main towns of Haslingdon and Rawtenstall where it forms a key element within a mixed use regeneration project in line with the provisions of JLSP policy 12.	Agree that a policy need to cater for housing as part of wider mixed-use scheme within the main urban areas – as mentioned in the supplementary text to policy 12.	Add further exception criteria in accordance with supplementary text to policy 12.

Ref	Body / Organisation	Representation	Responses	Changes
	Planning Sense	Allow for residential development in replacement of HMR clearances in sustainable locations of high demand in the main towns of Rawtenstall, Haslingdon and to a limited quantum in Bacup in accordance with the guidance of PPS 3. This would be consistent with the provisions of JLSP policy 13 and RSS 13 paragraphs 5.27-5.29	<p>The interim policy is being pursued to enable the Council to plan, monitor and manage the release of housing land in accordance with housing figures in the Joint Structure Plan. Were the Council to permit residential development in locations of high demand in the main towns, there is a concern that the figures in the development plan will be greatly exceeded, compromising sustainable development in the Borough and prejudicing the proper planning of new employment, services and infrastructure.</p> <p>A more comprehensive strategy for the planned location for new housing will be pursued under the LDF – Core Strategy and Allocations DPDs.</p>	None
		Allow for the provision of special needs housing on sustainably located, brownfield sites (including conversions) in the main towns of Rawtenstall, Haslingdon and Bacup in accordance with North West Regional Housing Strategy Priority 4.1, JLSP policy 12 and the Council's Housing Strategy 2005-2008. Allow for the provision of affordable homes on sustainably located brownfield sites in Goodshaw, Greenfield, Eden, Cribden, Helmshore, Longholme and Hareholme wards.	<p>An exception policy will be included that includes development proposals that are for solely affordable housing or special needs housing. This would not restrict the delivery of affordable housing in areas such as Goodshaw, Greenfield, Eden, Cribden, Helmshore and Longholme.</p> <p>Would agree that a separate affordable housing exception policy should be included.</p>	<p>Include further exception policy for affordable and special needs housing.</p> <p>Clarify where affordable housing contributions are required.</p>

Ref	Body / Organisation	Representation	Responses	Changes
		Concern that under the current policy, affordable housing is only required under criteria (e) when 15 or more units are constructed in regeneration priority areas – where affordable housing is less of an issue.		
	Planning Sense	Identify such sites to provide for five years supply in accordance with the requirement of PPS3 para 54.	In the context of the current development plan figures; the Borough has well in excess of a 5-year supply of housing land.	The revised policy statement will identify the Councils current housing supply (in terms of the number of years supply).
	Planning Sense	Develop quantifiable parameters of demand, special need, sustainability of location (sequential test of location, brownfield elevation, flood risk etc), accessibility (public transport, cycle routes), sustainability of construction (energy efficiency, re-used and recycled materials, sustainable drainage, alternative sources of energy etc), mixture of uses etc; to be applied to the consideration of applications that involve residential development.	Such detailed parameters as suggested are beyond the scope of the interim policy guidance. Any planning application for residential development will have to satisfy all development plan policies.	Add supplementary text after criteria to provide qualification: <i>It is however stressed that even if sites meet the terms of the interim policy outlined below, they must also meet all other planning requirements to be acceptable for development. These requirements include assessments of flood risk and transport impact, as well as the need to conform with</i>

Ref	Body / Organisation	Representation	Responses	Changes
				<i>development plan policies covering wildlife, historical, archaeological and other impacts of development.</i>
PSR / 14	Artown Planners	Requests the statement is supplemented by a plan clearly delineating the areas covered by the main towns as the structure plan map from which criterion (d) is derived, is far from clear and applicants need to be able to make an assessment of whether a particular site falls within a main town or not. It would be useful if the 4 AAP were included on the same or a supplementary map.	Agree that a plan would add greatly clarity.	Include a plan.
	Artown Planners	There is scope for an additional criterion to cover exceptional proposals which do not fall within the aforementioned categories.	Whilst it is noted that a criteria could be added to cover exceptional proposals which do not fall within the aforementioned categories – this could lead to reduced clarity in approach and goes beyond the requirements of Structure Plan Policy 12.	None.

Appendix F: Affordable Housing Position Statement (January 2007) Consultation Reponses

Ref	Body / Organisation	Representation	Responses	Changes
PSR/01	United Utilities PLC	No Comment	None required	None
PSR / 02	Sport England	<p>Proposed approach is one of permitting historic building rates to continue, enabling affordable housing provision needs to be met on appropriately sized sites until the new requirements of the RSS (Regional Spatial Strategy) are published.</p> <p>Historic rates however exceed the needs of the Borough and its continuation may be unsustainable and subject to challenge.</p>	<p>The affordable housing / interim housing policies are not based on permitting historic building rates. Indeed, the purpose of the interim policy is to reduce the supply of housing land in order to satisfy Structure Plan Policy 12. Historic building rates have, however, been used to illustrate the level of contribution required in terms of affordable housing, in order to deliver the number of units per annum as identified in the Housing Market Needs Assessment.</p> <p>It is also noted that in light of the interim policy, a continuation of these historic build rates is less realistic, as development over 15 dwellings will be more restricted. To mitigate this, an exception policy has been included for developments that are solely affordable housing and the threshold reduced to only 10 units and other exceptions included.</p>	<p>To order to manage the over-supply of housing, whilst also delivering increases in affordable housing, an exception policy is included in the interim policy.</p> <p>Add exception in interim policy for new build, on pdl, within urban boundary where the affordable housing contributions meets specified requirements - therefore stopping land from coming forward prematurely but not stopping affordable housing developments with limited market housing subsidy.</p>
		Proposed minimum requirement for affordable housing of 45% on sites accommodating 15 or more dwellings could have been set at a much higher	It is accepted that the supply of affordable housing will be limited under the interim policy, and that achieving over a 100 units a year is unmanageable. A plan, led approach	To order to manage the over-supply of housing, whilst also delivering increases in affordable

Ref	Body / Organisation	Representation	Responses	Changes
		<p>minimum rate, to avoid unnecessarily releasing more housing land when the level of existing housing commitment has created a potential over-supply situation.</p> <p>Raising the minimum proportion of affordable housing per site could save land from being developed prematurely.</p>	<p>to affordable housing will be pursued under the LDF, which will set an overall target for the amount of affordable housing to be provided.</p>	<p>housing, an exception policy is included in the interim policy.</p> <p>Add exception in interim policy for new build, on pdl, within urban boundary where the affordable housing contributions meets specified requirements - therefore stopping land from coming forward prematurely but not stopping affordable housing developments with limited market housing subsidy.</p>
PSR / 03	The Theatres Trust	No Comments	None required	None
PSR / 04	Harvest Housing	<p>West View site falls outside the AAP boundaries, however to achieve affordable housing figures as per the HMNA, the site is a key aspect. The site is in a sustainable location, closely linked to the key service centre of Haslingden, the land is brownfield, formerly the site of housing association flats and has been unoccupied for five years. There is the opportunity to gain support from the</p>	See comments on interim policy statement	Exception policy to be included for proposals that are solely affordable housing.

Ref	Body / Organisation	Representation	Responses	Changes
		Housing Corporation in terms of funding for land owned by RSLs'. Policy should make reference to and accept applications for residential schemes of 100% affordable housing which lie outside AAP areas.		
PSR / 05	Hurstwood Group	Many sites within AAP areas have planning permission without any PPS 3 affordable housing. The Valley Centre is to be considered for housing development, but is not intended to include affordable housing on site due to commercial viability issues.	<p>The affordable housing statement has been derived to respond to the challenges created by the fact that many outstanding planning permissions will not provide affordable housing and a continuation of this approach is unacceptable in light of the level of housing need.</p> <p>The affordable housing policy will make it very clear that proposals for residential development will only be acceptable where they make the required contributions towards affordable housing.</p>	Further clarification will be included within the affordable housing policy statement about commercial viability.
	Hurstwood Group	As part of the revised policies exercise there is an obvious need to assess the potential of available sites in the AAP boundary areas to deliver affordable housing in numbers terms (those with permissions and no affordable housing should not be included). In my view this has to be a starting point before considering interim policies and should be considered in detail on a site by site basis in any report to be considered by	<p>PPS states that an overall target for the amount of affordable housing to be provided should be outlined through the Council's LDF. The purpose of this interim policy statement is to increase that delivery of affordable housing in the short term, prior to a comprehensive range of policies in the LDF.</p> <p>It is not the Council's responsibility to assess the economic viability of all available sites within the AAP boundary, but rather devise</p>	None.

Ref	Body / Organisation	Representation	Responses	Changes
		members.	appropriate policies that are sound and clearly justified and will deliver the Council's stated objectives in terms of addressing the lack of affordable housing in the Borough.	
	Hurstwood Group	The Council will need to consider widening its exceptions to the over-supply position to include allowing new build development on sustainable and accessible urban sites outside the AAPs areas. This will ensure that affordable housing need is fully realised in the short timescale in numerical terms.	The Council is seeking to increase the amount of affordable housing being permitted as a proportion of overall housing development. Moreover, this must be achieved against a backdrop of housing over-supply. Therefore the inclusion of new build development on previously developed land, within the main development location would only be accepted where they are deemed to make an essential contribution to affordable housing as interpreted in the policy.	Broaden the scope of the interim policy, and make explicit reference to the expected affordable housing contributions.
	Hurstwood Group	Supports further exceptions to allow conversions in main urban areas up to 4 units, there would be merit in increasing this number up to 20 so that beyond 15, an element of affordable housing can be provided.	The interim policy will broaden the scope of where affordable housing could potentially be provided. Given that PPS 3 states that affordable housing contributions can be made below the indicative threshold of 15, this will be reflected in the revised policy, increasing the opportunities for affordable housing.	Broaden the scope of the interim policy, and make explicit reference to the expected affordable housing contributions.
	Hurstwood Group	If the policy is widened to allow more exceptions and the release of more houses there may be scope to reduce the affordable housing thresholds which are too high (40%) and in most cases will not be achieved given abnormal/ section 106 costs. Not convinced the right balance has been struck between the need to	See interim housing policy comments. The interim policy will include an exception policy for developments that are solely affordable housing. Reduction of the proportion of affordable housing below 40% would not deliver the level of affordable housing that is required to	None.

Ref	Body / Organisation	Representation	Responses	Changes
		allow more residential units to achieve affordable housing need numbers and also to ensure that developers are not forced to invest in other areas where policy restrictions are not as great.	address housing need in the Borough. The interim policies are intended to strike a balance between increasing the supply of affordable housing (whilst accepting that this will require some market housing), within an overall context of managing the release of housing land in accordance with Policy 12 of the Structure Plan. The supplementary text to this policy states that in situations of oversupply proposals should not be approved unless they make an essential contribution to the supply of affordable or special needs housing or regeneration objectives. Allowing more market housing is only seen to satisfy this criteria were the contribution to affordable housing is deemed “an essential contribution”.	
	Hurstwood Group	Supportive of the fact that affordable housing policy is non-specific in terms of tenure and size and the caveat that developers will not need to provide PPS 3 affordable housing on a site if they can justify that a scheme will not work in viability terms.	Support welcomed.	None.
PSR / 06	Lancaster County Council	Paragraph 23 of PPS 3 (Planning Policy Statement) states that the national indicative minimum site size threshold for affordable housing is 15 units. In view of the current situation of housing	Agree that the threshold should be reduced, and that reduction the size threshold for contributions is justifiable in light of existing housing need assessment.	Lower thresholds for contribution below 15 in certain circumstances.

Ref	Body / Organisation	Representation	Responses	Changes
		supply in Rossendale, consideration should be given to reducing the threshold.		
PSR / 07	Turley Associates on behalf on Clifford Developments	Do not feel that the blanket requirement across the Borough for 45% of units on residential developments to be affordable is justified in terms of the 2005 Housing Market and Need Assessment (HMNA).	The interim policies are intended to strike a balance between increasing the supply of affordable housing (whilst accepting that this will require some market housing), within an overall context of managing the release of housing land in accordance with Policy 12 of the Structure Plan. The supplementary text to this policy states that in situations of oversupply proposals should not be approved unless they make an essential contribution to the supply of affordable or special needs housing or regeneration objectives. Allowing more market housing is only seen to satisfy this criteria were the contribution to affordable housing is deemed “an essential contribution”.	None.
		The Housing Position Statement (HPS) states that the six wards with the greatest affordable housing requirements are in the north, west and south of Rossendale. It argues that as the areas are rural, they are not appropriate locations for development, so affordable housing for these wards will have to be provided elsewhere in the Borough.	Agree that the Policy statement should clarify that whilst these areas are not suitable for large scale residential development, exceptions will be made for proposals which include solely affordable and special needs housing. The council will also use off-site contributions for the areas where development is acceptable under the interim policy, to need affordable housing need in the areas where the most affordability issues exist.	Add exception policy to ensure delivery of affordable housing in areas of greatest need. The affordable housing policy statement will clarify the Council’s approach to off-site contributions.

Ref	Body / Organisation	Representation	Responses	Changes
		<p>The statement fails to take into account the 2005 market needs assessment in terms of the types of units that are required to relieve housing pressure in the wards with the greatest need.</p> <p>The provision of affordable units in the more urbanised areas of Rossendale under this position statement may not be the correct type of units to relieve housing pressure in the more rural areas. Thus it is likely that the affordable units would be occupied by residents from wards where affordable housing need was not acute, meaning that the residents from the wards where it is, would not benefit.</p> <p>This need is best tackled by the allocation of rural exception sites as set out in PPS 3 (paragraph 30) and elaborated in the guide "Delivering Affordable Housing".</p>	<p>Agree that the Policy statement should clarify that whilst these areas are not suitable for large scale residential development, exceptions will be made for proposals which include solely affordable and special needs housing.</p> <p>The interim policies are intended to strike a balance between increasing the supply of affordable housing (whilst accepting that this will require some market housing), within an overall context of managing the release of housing land in accordance with Policy 12 of the Structure Plan. The supplementary text to this policy states that in situations of oversupply proposals should not be approved unless they make an essential contribution to the supply of affordable or special needs housing or regeneration objectives. Allowing more market housing is only seen to satisfy this criteria were the contribution to affordable housing is deemed "an essential contribution".</p>	None.
PSR / 08	Natural England	No comment	None required	None.
PSR / 09	Friends, Families and Travellers	Measures in the 2004 Housing Act requires local authorities to include Gypsies and Travellers in the accommodation needs process and have	Policy is designed to elaborate on development plan housing figures contained within the Joint Structure Plan Policy 12. This specifically refers to the number of new	None

Ref	Body / Organisation	Representation	Responses	Changes
		a strategy in place which sets out how any identified needs will be met as part of their wider housing strategies. Wish to see specific mention of the needs of Gypsies and Travellers included in all affordable housing documents and strategies.	dwellings (my emphasis) for new household in the period 2001 – 2016. Travellers site do not fall within the scope of policy 12.	
PSR / 10	National Trust	Notes that the national site size threshold of 15 units for affordable housing as set out in paragraph 29 of PPS 3 is an “indicative minimum”. PPS 3 goes on to state LPAs’ (Local Planning Authority) can set lower minimum thresholds and furthermore the need to deliver low cost market housing is a particular fact to consider. The AHPS (Affordable Housing Position Statement) suggests there is indeed an unmet demand for affordable housing that will not be met by the provision of 45% affordable housing units on developments of more than 15 units. Begs the question whether there is a case to made for requiring some affordable housing provision at 25% or 10% levels on sites of 10 to 14 units?	Given that PPS3 allows local authorities to set lower minimum thresholds (that the indicative minimum of 15) it is acknowledged that this should be reduced further. At the current time there is an over-supply of housing, therefore reduced affordable housing contributions will be acceptable, as this will increase the problem of over-supply with reduced benefits in terms of affordable housing provision.	Reduce threshold below 15 in certain circumstances.
PSR / 11	North West Regional Assembly	Adopted RSS policy UR9 and Submitted Draft RSS policy L5 offer some support towards provision of affordable housing.	The regional policy framework for affordable housing provision is acknowledged.	None.
PSR / 12	Taylor Young on behalf of B	Requiring 45% affordable housing is considered to be excessive. It is noted	Reduction of the proportion of affordable housing below 45% would not deliver the	None.

Ref	Body / Organisation	Representation	Responses	Changes
	& E Boys Ltd	that viability is a consideration and this is very important. It is essential that developers wanting to invest in Rossendale are not deterred by excessive affordable housing requirements.	level of affordable housing that is required to address housing need in the Borough. The emphasis is on applicants to demonstrate where this is not economically viable. It is not the Council's responsibility to assess the economic viability of all available sites within the AAP boundary, but rather devise appropriate policies that are sound and clearly justified and will deliver the Council's stated objectives in terms of addressing the lack of affordable housing in the Borough.	
		It is understood there is a conflict between preferred locations for housing and locations of identified housing need. It seems the only potential location for affordable housing would be within Rawtenstall town centre.	The scope of where affordable housing will be permitted under the interim policy will be broadened, particularly to include proposals that are solely for affordable housing. Therefore Rawtenstall Town Centre is not the only possible location for affordable housing.	None.
		Locations where affordable housing would be required are very unclear. A plan identifying locations where the provision of 45% affordable housing would be required should be provided.	An affordable housing contribution will be required in accordance with the development criteria included in the policy. There is a presumption that this will be provided on site, however it is recognised that if there is no affordable housing need in the area, then contributions would be better used elsewhere, in the nearest geographical area of need as documented in the Housing Needs Assessment.	Provide further clarification in the housing policy statement regarding the findings of the housing needs assessment and the geographical distribution of need.
		It is assumed that 45% affordable housing	Agree that 45% provision of affordable	Remove blanket

Ref	Body / Organisation	Representation	Responses	Changes
		<p>will not be required within the Bacup, Stacksteads and Britannia HMR area, as these locations are considered to be too far away from wards with an identified affordable housing need.</p> <p>To require affordable housing in this location would contradict HMR objectives. Clarification on this matter is required</p>	<p>housing within the HMR area will not always be economically unviable and a reduced contribution will be required where justified with regards to the Housing Needs Assessment.</p> <p>Further clarification and justification for affordable housing contributions (and the housing needs assessment which serves as the evidence base for the document) will be included.</p>	<p>requirement for 45% affordable housing in the HMR areas where development is for 15+ dwellings.</p> <p>Provide further clarification and justification for approach.</p>
PSR / 13	Planning Sense	<p>Joint Lancs. Structure Plan policy 12 offers an exception to the strict control of residential commitments to allow residential development to meet special housing needs wherever there is demand. The provision of special needs housing is established policy of Council's Housing Strategy 2005-2008. The statement would deny the opportunity to deliver such housing for the elderly, for the mobility impaired, for the ethnic community, for young people trying to live outside conventional family circumstances and son on, other than by way of residential conversions of 4 units or less.</p> <p>Should allow for the provision of special</p>	<p>Agreed that the interim policy statement (s) should identify more clearly the expectations regarding special needs housing</p>	<p>Clarify the requirements for special needs housing</p>

Ref	Body / Organisation	Representation	Responses	Changes
		needs housing on sustainably located brownfield sites in the main towns of Rawtenstall, Haslingden and Bacup.		
		<p>Rosendale's Housing Market Needs Assessment 2005 (HMNA) identified a need for 347 affordable homes for the period April 2005 to March 2010, equating to just over 69 per year. The housing market areas with most affordable need are Goodshaw, Greenfield, Eden, Cribden, Helmshore and Longholme. There is no shortage of affordable homes in Bacup, Stacksteads and Britannia. However the statement suggests only residential developments of 15 or more units should make provision for affordable homes and then precludes such developments in the areas of highest need (other than Rawtenstall town centre), perversely directing such developments to Bacup, Stacksteads and Britannia where there is an over-supply of affordable homes.</p> <p>A more appropriate policy would allow for the provision of affordable homes on sustainably located, brownfield sites (including conversions) in Goodshaw, Greenfield, Eden, Cribden, Hekmshore, Longholme and Hareholme wards in</p>	<p>The interim policies are intended to strike a balance between increasing the supply of affordable housing (whilst accepting that this will require some market housing), within an overall context of managing the release of housing land in accordance with Policy 12 of the Structure Plan. The supplementary text to this policy states that in situations of oversupply proposals should not be approved unless they make an essential contribution to the supply of affordable or special needs housing or regeneration objectives. The council will also use off-site contributions for the areas where development is acceptable under the interim policy, to need affordable housing need in the areas where the most affordability issues exist.</p>	None.

Ref	Body / Organisation	Representation	Responses	Changes
		accordance with RSS 13 policy UR9 and JLSP policy 12 and the Councils' Housing Strategy 2005-2008.		
PSR / 14	Artown Planners	No comments	No comments	None

APPENDIX 2 - Rossendale Borough Council Response to Representations from Mr. S Hartley and Mr. D Hartley Concerning the Adoption of the Interim Housing Policy Statement October 2007

1. The Interim Housing Policy Statement October 2007 can only be afforded limited weight as it has not been subject to “meaningful consultation” and contains a different set of criteria for dealing with residential proposals than those contained in the earlier version of the statement. Moreover the Interim Housing Policy Statement October 2007 should be subject to further “meaningful” public consultation.

The Revised Interim Housing Position Statement January 2007 went out to consultation earlier this year. The amended criteria reflect the responses of the representations made via the consultation process. As such, the Interim Housing Policy Statement October 2007 will not be subject to further “meaningful consultation” as the process had been conducted on the earlier Revised Housing Position Statement January 2007. Moreover due to the consultation process undertaken on the previous position statement, it is the Councils’ view that the policy statement can be given significantly more weight than that of its predecessors.

2. There is “ample” evidence that Rossendale is in a position of undersupply and; there is no advantage for the Council to argue otherwise and; “historically” there has only been a completion rate of 9.6% a year for outstanding planning permissions, with no indication that the long term trend will alter.

There is “very ample” and substantiated evidence published by the Council in the Housing Supply Position 2006/2007 and other documents that Rossendale is indeed in a significant position of oversupply. On average since 2001 there have been 181.6 completions per financial year and “there is no evidence that the long term trend will alter”. At this rate, the 1,417 outstanding permissions will be built-out in 7.8 years. Hence by late 2014 Rossendale will have exceeded its 1,920 dwelling allocation completely. In addition several recent appeal decisions have upheld the Councils’ position on oversupply, namely:

- Land rear of 521-531 Helmshore Road, Helmshore, Rossendale
- 4 Daneswood Avenue, Whitworth, OL12 8UY
- Land at Bacup Road, Hareholme, Rossendale BB4 7RJ
- Mill End Mill, Burnely Road East, Waterfoot, Rossendale BB4 9DF

3. The Council must undertake an analysis of residential approvals for their “deliverability” as defined by the Government. Until the results have been collated the Council has “no idea if there is to be a five year land supply” within Rossendale.

On average since 2001 there have been 181.6 completions per financial year and “there is no evidence that the long term trend will alter”. At this rate, the 1,417 outstanding permissions will be built-out in 7.8 years, demonstrating a predicable 5 year land supply. Hence by late 2014 Rossendale will have exceeded its 1,920 dwelling allocation completely. In addition the Council is also undertaking a Housing Land Deliverability study in line with government guidance and has already received responses to the survey. Moreover, the Council is aware of the requirements set out paragraph 55 of PPS 3 and is undertaking the

appropriate monitoring action to ensure it complies with government guidance and would highlight that the Council adhered to such guidance by undertaking a survey resulting in the Housing Land Position Monitoring Report May 2005, which has also been upheld in recent appeals.

4. Housing approvals in the two Area Action Plans are to be regarded as “extra”.

The Council would highlight that only the Rawtenstall Area Action Plan indicates that approvals within the boundary are “in addition”. The housing components of the Rawtenstall Area Action Plan are considered to contribute towards the supply of affordable or special needs housing or form an essential part of the mixed regeneration approach for Rawtenstall as stated in section 5.5. However it is considered that the response to Hurstwood Group Ltd on page 44 (along with any other inconsistencies) within the AAP should be amended to acknowledge that whilst the supply of housing within the Rawtenstall AAP is acceptable where it forms part of a mixed use regeneration scheme it does contribute to housing supply within the borough.

5. “Someone” in the Regional Office states that the Council should not rely on the emerging RSS figures; the Government says otherwise and the Council supported the emerging RSS figures in the recent Panel Inquiry into the plan.

Government Office North West has advised the Council for some considerable time now, that until the emerging RSS is adopted, Rossendale is to continue to use allocations as set out in current adopted policy documents such the Joint Lancashire Structure Plan and adopted (RPG) RSS 13. The Council did support the recent Panel Inquiry into the emerging RSS. Nonetheless the RSS is still subject to changes and until such a time as the document is adopted the Council considers approving applications on un-adopted figures to be misleading and wrong.

6. The Interim Housing Policy Statement October 2007 proposes that sites of less than 20 houses should be permitted in urban areas but must make a contribution to regeneration above and beyond simple redevelopment.

The Council would highlight that proposals for 20 units or less, within the urban boundary of the main development locations on previously developed land and buildings (PDLB) need not contribute to regeneration over and above simple development. Instead, the policy statement will only accept such proposals where they make an essential contribution to the supply of affordable housing as interpreted in appendix A of the statement.

7. The inclusion of the definition of regeneration benefits is completely unnecessary and “unfathomable”, either a site will benefit from development or it will not. The woolly condition should be deleted.

It is the view of the Council that “regeneration benefits” need to be defined in order to appropriately plan, monitor and manage the release of housing land within Rossendale. To argue that a site will benefit from redevelopment does not take into account the wider impacts of the development. In order for Rossendale to achieve the deliverability of a spatial development approach in a climate of oversupply, proposals must be able to demonstrate the development will have regeneration benefits for the wider locality. Such a definition is not a new concept paragraph 6.3.13 of the adopted Joint Lancashire Structure Plan states: **“where there is a**

significant oversupply of housing permissions, planning applications for further residential development may not be approved unless they make an essential contribution to the supply of affordable or special needs housing or form a key element within a mixed use regeneration project. Any such project should be compatible with, and help achieve, the regeneration objectives of the Local Authority’.

This will enable the Council to select by sequential means those proposals which will deliver such benefits and assist with the Councils own regeneration objectives and priorities.

8. There are conflicting thresholds for the provision of affordable housing within the policy statement. The policy statement allows for the conversion of PDLB of up to four residential units, would it not be sensible to permit conversion and change of use up to 20 units in line with criteria e). Paragraph 29 of PPS 3 states that local planning authorities should “*set out the range of circumstances in which affordable housing will be required*”. It also states “*The national indicative minimum site size threshold is 15 dwellings. However Local Planning Authorities can set lower minimum thresholds, where viable and practicable, including in rural areas*”. Rossendale has introduced such a “range”. In order for the borough to meet national targets of 60% of new development to take place on previously developed land and buildings (PDLB) as well as delivering 105 affordable units per year, the Council has introduced criteria in favour of the re-use of PDLB (brownfield land). In order to encourage such developments, the policy statement allows for the conversion or change of use of buildings within the urban boundary where the number of units is four or less, making it more attractive for developers to choose such proposals, by not requiring the deliverability of any affordable units and without greatly affecting the oversupply situation.
9. The policy statement will require applicants to pay for the Council to undertake a viability analysis of proposals where the provision of affordable housing is not commercially viable. Item RA7 of The Improvement Plan for Section 106’s June 2007 (Review) undertaken by an independent specialist, recommends that the Council “***Establish a policy and procedure which requires developers claiming that proposed contributions would make a scheme unviable to produce a site viability appraisal and to pay for the costs of an external specialist to carry out an independent review of the appraisal, for consideration by the Development Team.***” The policy statement is therefore implementing the advice given to the Council to reflect the recommendations within the review.
10. The policy statement makes no reference to rural areas and the many barns which are no longer required for agricultural purposes, what is to become of them.
The Council would highlight that Mr. S Hartley is misguided in his assumptions that the only possible use of redundant agricultural buildings is conversion to residential. The Council considers favourably applications proposing farm diversification within the borough and welcomes such applications which would benefit Rossendale. The Council would also highlight that Annex B of PPS 3 defines previously developed land (brownfield land) as “***land which is or was occupied by a permanent***

structure, including the curtilage of the developed land and any associated fixed surface infrastructure". The definition includes defense buildings but excludes "land that is or has been occupied by agricultural or forestry buildings". Most agricultural buildings including barns are located outside the urban boundary of the main development locations in the countryside on Greenfield land and therefore would be decided in line with PPS 7 and other relevant planning policies. In addition the policy statement does set out criteria to determine such proposals under criteria b) **the proposal can be justified in relation to agricultural and forestry activities.**

11. The reduction of affordable housing provision to 30% within the AAP areas is welcomed however is still too high and should be identified on a ward by ward basis; has the Housing Need and Market Assessment 2005 been updated?

In order for the Council to meet affordable housing targets, a threshold requirement for its provision must be made. The Council has agreed that 30% is adequate and does allow developers the scope to employ (through the Council) an independent specialist to test viability where it is argued that such provision cannot be met. The Housing Need and Market Assessment 2005 is currently being updated but is not yet available for public viewing as it is yet to be finalised. Nonetheless the document will incorporate the key service centres identified in the housing market within the EcoTec study 2005 *Making Housing Count* as used in the preparation of the emerging Regional Spatial Strategy. The final published document will be available to view after adoption.

12. The conversion threshold in urban areas should be increased from 4 – 9 as it will have a greater regeneration impact; will allow applicants to make efficient use of buildings whilst ensuring proposals do not fall into the major planning application category.

It is the Council's view that a conversion threshold of four is adequate to support the regeneration objectives and priorities of the Council whilst encouraging developers to choose such options, by not requiring the deliverability of any affordable units and without greatly affecting the oversupply situation.

13. The policy statement is skewed in favour of demolition.

Circular No: 10/95: Planning Controls Over Demolitions, paragraph 4-1097 sets out the criteria under which demolition of buildings requires planning permission. In short permission has never been required to permit the demolition of buildings unless, they relate to;

- **The demolition of a dwellinghouse (and buildings adjoining them) outside conservation areas; and to gates, fences, walls etc, within conservation areas**

The position has not changed. As always the demolition of buildings not outlined above need not apply for planning permission. However in doing so, a proposal would then be required to provide an essential contribution of affordable housing under criteria e) and would not necessarily be guaranteed approval.

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آپانی یفلی ای لیفلےٹٹیر سار سٹف بڈ ہرفےر آپای، اڈیو کآسےٹے اٹھوا ہنرےجی آڈا انی کون آای پےتے آان آاہلے انؤہرے آرے آامآدےرکے آانآلے آامرا اتآسٹ آوشی منے آار آابصآھ کرآب۔

انؤہرے آرے ۰۱۹۰۶ ۲۱۹۹۹۹ ای نآنآرے اٹھوا کآمیونیکیشن سیکشن، ٹاؤن سنٹر افس، رٹسٹل بی.بی.۸ ۹ ایل.آے.ڈ. ای ٹیکانای آوآاآوآ کران۔

اگر آپ کو اس لیفلٹ کا خلاصہ بڑے حروف میں، آڈیو کیسٹ پر، یا انگریزی کے علاوہ کسی اور زبان میں درکار ہے تو برائے مہربانی ہمیں بتائیں، ہم بخوشی آپ کے لیے اس کا انتظام کریں گے۔

برائے مہربانی 01706217777 پر ٹیلیفون کریں یا پھر کمیونیکیشن سیکشن سے اس پتہ پر رابطہ قائم کریں:

Communications Section, Town Centres, Rawtenstall, BB4 7LZ

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