

**ROSSENDALE LOCAL PLAN
HOUSING TOPIC PAPER**



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Rossendale
BOROUGH COUNCIL

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1. Introduction

1.1 This topic paper explains how the housing need for the Borough has been evidenced and the reasoning behind the identification of the sites allocated for future housing development within the Local Plan. Unless otherwise indicated, the version of the Local Plan referred to in this Topic Paper is that published as part of the Regulation 19 Pre-submission Publication stage (consulted on between August and October 2018) and which will be subject to the Local Plan Examination. This may simply be referred to as the Local Plan or emerging Local Plan.

1.2 This topic paper provides an update on the previous housing paper which was published as part of the consultation at Regulation 19 stage. The update was felt necessary in order to provide additional clarification, for example on how the housing land supply has been identified.

1.3 The strategic and local housing policies in the Local Plan were prepared in line with the National Planning Policy Framework (NPPF) and have been informed by a number of evidence base documents, as follows:

- Strategic Housing Market Assessment (SHMA)¹
- Strategic Housing Land Availability Assessment (SHLAA)
- 5 Year Housing Land Supply
- Green Belt Review
- Strategic Flood Risk Assessment (SFRA)
- Landscape Assessment
- Heritage Impact Assessment
- Self-Build Register
- Brownfield Land Register
- Sustainability Appraisal (SA)
- Habitats Regulation Assessment (HRA)

1.4 This topic paper will first discuss the housing need for the Borough during the Local Plan period (2019-2034), and then explains the reasoning behind the proposed housing site allocations.

1.5 The distribution of housing within the Borough, the proposed Green Belt releases and the need and supply of housing for the Gypsy and Traveller communities are addressed in other topic papers.

Background to the preparation of the Local Plan

1.6 Rossendale Core Strategy was adopted in 2011. This represented “Part 1” of the Development Plan at the time, setting out an overall strategy and associated

¹ The SHMA for the Local Plan was first produced in 2016 and informed the Plan’s housing policies. The SHMA has since been updated (March 2019) and, whilst the update has not been used to amend the Local Plan, it provides further information in support of it. This includes a more detailed breakdown of housing need in terms of the size, type and tenure of housing required. Unless otherwise indicated however, reference to the SHMA throughout the rest of this paper will relate to the 2016 version as this was the evidence in place at the time of the Plan preparation.

policies. At this time, work was also underway on preparing Part 2 of the Plan (Lives and Landscapes) which was to identify site allocations to support Part 1. A large volume of background work was undertaken on this, including developing an evidence base and detailed consultation on the draft Part 2 Plan. However, as this progressed, it became apparent that due to changes in circumstances (for example, new assumptions and methodologies for identifying housing need), that it would no longer be appropriate to produce an allocations documents based on assessed development needs from the Core Strategy. The Part 2 document was therefore formally withdrawn in 2016.

1.7 As a great deal of work had already been undertaken in preparation of Part 1 and 2 of the Core Strategy (and because of the need for a review to take account of new circumstances), it was proposed that a revised Plan should be produced. This would enable the strategy, policies and allocations to be updated, whilst still being able to make use of the evidence and consultation responses from the previous Plan stages which had already considered a number of options.

2. Understanding Rossendale Borough's Housing Need

2.1 Identifying the Housing Market Area (HMA)

2.1.1 To a large extent the Housing Market Area (HMA) for Rossendale can be described as being self-contained, albeit that the level of self-containment at 61% falls below the recognised migratory threshold that 70% of local houses moves are contained, as advocated in Government guidance. Despite a number of alternative scenarios being explored, none of the alternative HMA areas produced a self-containment level that was significantly higher than that using the Borough boundary alone. The SHMA has also recognised that, given that the district has overlapping HMAs with a number of other authorities nearby, it is reasonable and pragmatic to take the administrative boundaries of Rossendale Borough as being a 'best fit' HMA for planning purposes, whilst acknowledging the Borough's Duty to Cooperate with adjoining authorities to ensure that housing needs are met in full at a strategic level.

2.1.2 The results of the SHMA analysis were shared with adjoining authorities (Rochdale, Bury, Burnley, Hyndburn, Blackburn with Darwen and Calderdale) and they have agreed that, for the purposes of meeting housing requirements, the best geography to use for the Rossendale HMA coincided with the Borough boundary.

2.1.3 Nevertheless Rossendale has strong links and high inter-dependency with the adjoining Boroughs. These are particularly apparent with Rochdale and Bury, reducing in order of magnitude starting with Hyndburn and Burnley. This is shown in the map below, taken from the Rossendale SHMA.

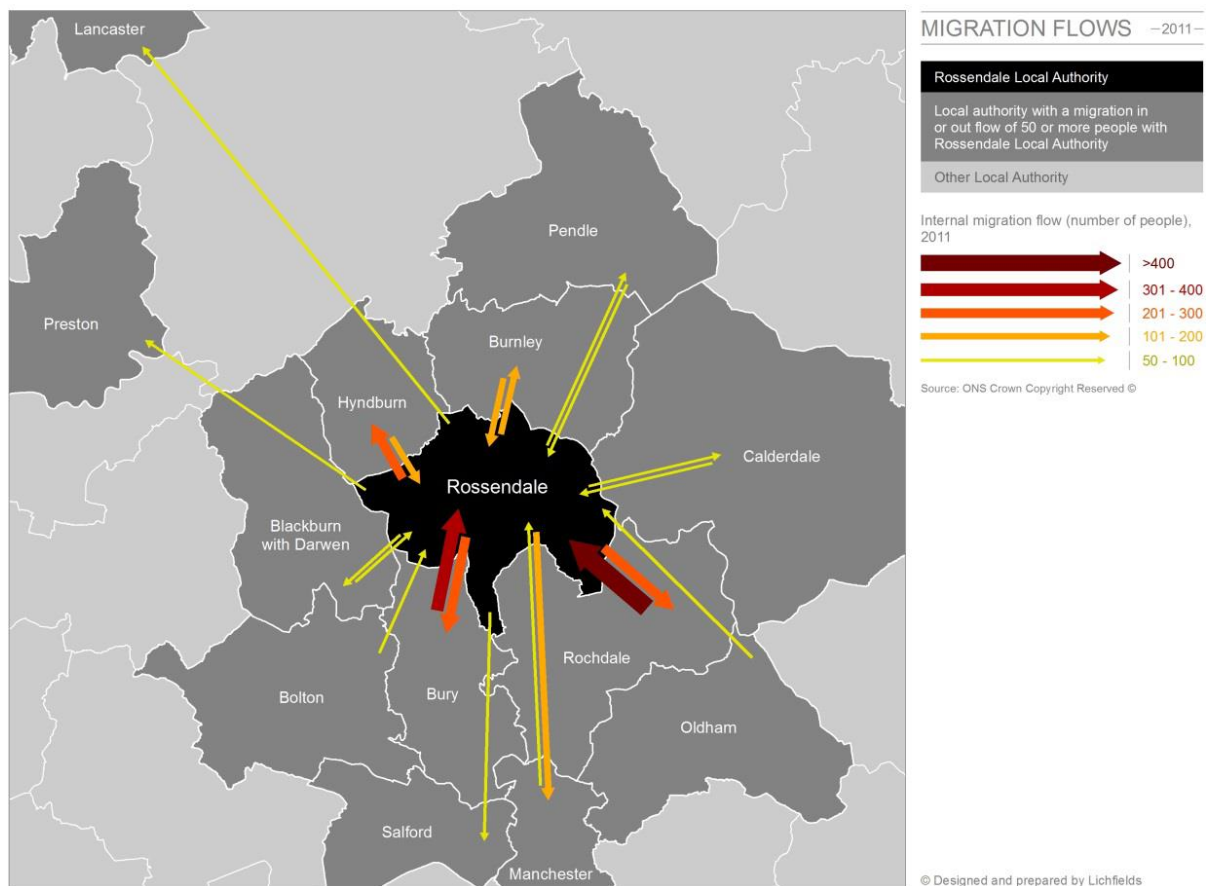


Figure 1 Migration Flows in and out of Rossendale (Extract from Rossendale SHMA)

2.2 Local Housing Need

2.2.1 The revised NPPF was published on 24th July 2018 by the Ministry of Housing, Communities and Local Government (MHCLG) and includes new policies² on how to deliver a sufficient supply of homes.

2.2.2 In order to identify the number of homes needed, the NPPF states that a standard methodology to calculate the local housing need should be used. This standard methodology is set out in national Planning Practice Guidance (PPG) on Housing Need Assessment which has recently been updated. The Local Plan was prepared whilst the revised NPPF and proposed standard methodology was still in draft form but the housing need identified is considered to accord with the confirmed methodology.

² Since the Local Plan housing need was first identified, the Government have confirmed that the 2014-based housing projections should be used as the starting point for the calculation. The figure of 212 calculated for the period 2016-26 is very similar to the figure of 204 dwellings per year which is identified if the methodology is applied from the start of the Local Plan period which is 2019. As the Local Plan target is actually slightly higher than the 2019 figure, this is felt to accord with the Government's preferred approach.

2.2.3 The proposed standard methodology was first set out as part of the consultation on the “Planning for the right homes in the right places” white paper, which ended in November 2017. The methodology used the 2014-based household projections and considered the ten year period from 2016 to 2026. The results showed that a minimum of 212 new homes were needed every year. The details of the calculation are shown in Appendix A.

2.2.4 Based on a need of 212 homes per year, the total local housing need for Rossendale over the Local Plan period (which spans 15 years, from 2019 to 2034) is 3,180 additional dwellings. This local housing need is set out in strategic policy HS1 of the emerging Local Plan.

2.2.5 The housing requirement set out in strategic policy HS1 is different from the housing need that was proposed in the Regulation 18 version of the Plan. The previous housing need was based on the calculation from the Strategic Housing Market Assessment (SHMA) (2016) while the updated housing need (used in the publication version) is based on MHCLG’s standard methodology.

2.2.6 The SHMA (2016) was undertaken prior to the revised NPPF and updated PPG (and associated consultation), so did not consider the standard methodology to identify housing need. However, the SHMA provided further analysis in terms of the need for affordable homes and the need of specific groups within the local community (which is also a requirement of the new NPPF).

2.2.7 The Council has met and corresponded with neighbouring authorities on a broad range of issues including housing. Neighbouring authorities are unable to meet any of the Borough’s housing need. Therefore the Local Plan seeks to meet the need for housing within the Borough itself. More information about the duty to co-operate between authorities can be found in the Duty to Co-operate incorporating the Statement of Common Ground statement.

2.3 Edenfield Community Neighbourhood Forum Housing Need

2.3.1 Edenfield Community Neighbourhood Forum and associated Neighbourhood Area was designated in April 2018. The Forum is now preparing a Neighbourhood Plan for its area.

2.3.2 The NPPF states that the housing need for designated neighbourhood areas should be identified within the strategic policies of the Local Plan. The housing need for the Edenfield Community Neighbourhood Forum area is based on the spatial strategy which is set out in a separate topic paper. As set out in the Local Plan, the housing need for the neighbourhood area is 456 additional homes within the Plan period.

2.4 Housing Need for Different Groups in the Community

2.4.1 The NPPF sets out that the need for housing from different groups within the community (e.g. people requiring affordable housing, families with children, older

people, people with disabilities, travellers, people who rent their homes or wish to build their own homes) should be assessed and defined in the Local Plan policies.

2.4.2 The SHMA (2016) assessed the housing need for different groups in the community including people requiring affordable homes, families with children, older people. The need of the Traveller community has been assessed in the Gypsies and Travellers Accommodation Assessment (2016) and is discussed within the Gypsies and Travellers topic paper.

Affordable Housing

2.4.3 The SHMA considers the current (backlog) need for affordable housing as well as the future arising need for affordable housing. Using data from the Housing Register, the affordable housing need for Rossendale was identified as between 158 to 321 new dwellings per year over 20 years. The different range reflects different assumptions about the proportion of income which could reasonably be spent on housing.

2.4.4. The Viability Study carried out in 2017³ assessed the viability of delivering affordable housing on potential development sites across the Borough. The study divided Rossendale into four zones for the purpose of the study (please see table 1). The report identified that the provision of affordable housing is not viable in Zone 1, but can be viable within the remaining zones depending on the density of the scheme and whether it is on brownfield or greenfield land.

Table 1: Zone based on residential sales prices

Zone	Areas
1	Bacup, Stacksteads and Weir
2	Whitworth and less affluent portions of Rawtenstall
3	Crawshawbooth, Northern Rawtenstall, and portions of Helmshore and Haslingden
4	Affluent parts of Rawtenstall, Haslingden and Helmshore, and Edenfield

2.4.5 In order to increase the number of affordable housing built in the Borough, the Council expects that 30% on-site affordable housing from market housing schemes will be provided subject to site and development considerations (such as viability) for sites of 10 or more houses or sites of 0.35 ha or part thereof. The requirement is set out in the emerging Local Plan policy HS6.

Families with children

2.4.6 The SHMA reveals that the number of families with children is expected to increase and the number of homes with children will stay high. Therefore, an adequate stock of good quality family housing should be provided within the Borough.

³ An updated Viability Study has also been produced which again has not been used to amend the Local Plan but does provide further information.

Older people

2.4.7 The study shows that there is a current lack of supply of specialist housing for older people in the Borough especially regarding Extra Care and Enhanced Sheltered accommodation. Furthermore, there will be a significant growth in the number of older person households in the future which will increase the need for Sheltered Housing, Registered Care, Extra Care and Enhanced Sheltered accommodation. The study concludes that approximately 1,700 units for older people will be needed by 2035.

2.4.8 The proposed policy HS6 requires that sites of 10 or more dwellings should provide affordable housing in line with the latest information on housing needs, including the need for specialist housing for older people.

People with disabilities or health issues

2.4.9 The SHMA survey reports that 15.8% of households in Rossendale have one or more adults with a disability. The study shows that 8.62% of these households consider that their home is unsuitable to meet their needs, compared to 5.25% for the average household in the Borough.

2.4.10 The SHMA also reports that, according to the B-with-Us Housing Register, 27.6% of all those on the register have a disability. This is three times higher than might be expected given the proportion identified as being in need of suitable accommodation in the general survey. This indicates that people with a disability are finding it more difficult to access suitable social housing than other households. This implies a lack of housing for people with disability which will need to be planned for.

2.4.11 Policy HS8 requires that at least 20% of new houses should be tailored to meet the needs of elderly and disabled people, or be easily adaptable in line with the guidance set out in the Optional Technical Housing Standards or Building for Life 12.

Minority and hard to reach households

2.4.12 The majority of the people in Rossendale (93.9%) classify themselves as 'white British', leaving a small percentage of other ethnic groups. Amongst those people from an ethnic minority group in the survey, one of the main issues that was identified in relation to housing need was that the size of their house was too small to meet their needs. The SHMA highlights that ethnic groups might choose to extend their homes to meet the need of their growing household rather than change home.

Rural Communities

2.4.13 The SHMA reveals that residents seeking social housing and who wish to remain living in rural areas of the Borough are less likely to apply for a place on the Council's Housing Register due to the lack of supply in these areas. However, it

points out that there is a strong demand for housing in rural areas. Pressures on the housing market and a lack of supply are issues that were highlighted in Edenfield in particular.

2.4.14 Policy HS6 sets out that 100% on-site affordable housing will be required on rural exception sites. Policy HS3 for the housing site allocation in Edenfield also requires on-site affordable housing.

First time buyers and young people

2.4.15 The SHMA shows that the number of households headed by a resident aged 24 or under is very low and is not projected to increase. The private rented sector is the key tenure enabling young people to live independently, but the percentage of stock in Rossendale is slightly lower than the regional and national average. The main issue is the availability of mortgage finance and setting aside a deposit to access home ownership.

Key workers

2.4.16 The SHMA reveals no issues regarding Key Workers' ability to access market or social housing within the Borough.

3. The Borough's Housing Land Supply

3.1 National policy

3.1.1 The Plan-making chapter of the NPPF (2018) sets out in paragraph 23 that strategic policies in a Local Plan should "provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development".

3.1.2 The NPPF also states that a policy-making authority should have a clear understanding of the land supply for housing within its area. This can be achieved by producing a strategic housing land availability assessment (SHLAA). Based on this assessment the planning policies should identify:

- "a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

3.1.3 The Council has prepared a SHLAA which, together with the other evidence base studies (e.g. the Green Belt Review, SFRA, the Landscape Assessment, the Heritage Impact Assessment, the SA and the HRA), has informed the housing site allocations.

3.2 Evidence Base

3.2.1 The following section provides a summary of the findings of the SHLAA and the sites that were assessed through it. The remaining sections of the chapter will then show the evolution of the site selection process, setting out how the Local Plan allocations were identified.

Strategic Housing Land Availability Assessment (SHLAA)

3.2.2 The SHLAA 2018 looked at a total of 425 sites. 64 of these were excluded at stage 1 of the assessment whilst the rest progressed to stage 2 of the assessment. Amongst those 361 sites, 7 have now been built out for housing, so they are not included in the land supply.

3.2.3 Amongst the remaining 354 sites, 92 sites were considered “deliverable”⁴ and could provide approximately 1,750 units over a five year period (for the SHLAA this was identified as 2018/19 to 2022/23). Approximately 160 dwellings within these sites (mainly on the large sites) were expected to be completed within 6 to 10 years (2023/24 to 2027/28). The SHLAA also identified 138 “developable”⁵ sites that could provide up to 4,900 houses within 6 years to 15 years (2023/24 to 2032/33). It was identified that approximately 100 units could be delivered sooner if certain constraints could be overcome. For example, for sites in multiple ownerships, some landowners were more willing than others to develop their land but if agreement could be reached between them, the site may be able to come forward sooner than suggested in the SHLAA.

3.2.4 The SHLAA is considered to be an optimistic indication of land supply as it includes sites outside of the Urban Boundary including sites on land designated as Green Belt⁶. The housing supply provided by the SHLAA has been refined using other evidence base studies including the Green Belt Review, the Heritage Impact Assessment, the Landscape Assessment, the SFRA and the Employment Land Review to identify housing site allocations within the publication version of the Local Plan. For example, a site identified as suitable for housing might also be suitable for employment use or might not be considered suitable for Green Belt release. Furthermore the SHLAA assessed each site in isolation, whilst the site allocations within the Local Plan considered the cumulative impact of development.

Five Year Housing Land Supply

3.2.5 This section provides a summary of the latest published Five Year Housing Land Supply (5YHLS) report, which has a base date of 1st April 2018. It is important

⁴ To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years (NPPF definition).

⁵ To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged (NPPF definition).

⁶ This is because a “policy-off” approach to the SHLAA was adopted. A review of the methodology used for the SHLAA was undertaken by ARUP and further information on this is included in the Evidence Base (see “Critical Friend Review of Rossendale SHLAA”)

to recognise that, as the 5YHLS is regularly updated, the housing land supply figures identified in the latest report may not exactly match those previously projected for the Plan period in the Local Plan. This is inevitable as sites will continue to come forward for development Local Plans are being prepared.

3.2.6 It should also be noted that the Local Plan period begins at 2019/20 whilst the current 5YHLS report is based on the five year period from 2018/19. Additionally, the 2018 5YHLS report does not include proposed Local Plan allocations unless they already had planning permission as of 1st April 2018. The Council will carry on monitoring the progress and status of housing sites and the next 5YHLS report will be prepared as soon as possible after the 1st April 2019 to demonstrate the latest housing land supply position.

Previous housing delivery

3.2.7 NPPF states that “policies should identify a supply of specific, deliverable sites for years one to five for the plan period”. Also, “where there has been a significant under delivery over the previous three years” a 20% buffer is required. This will be identified through the Housing Delivery Test (HDT) results which are due to be published in November each year. In future years, the HDT will measure housing completions against the lowest of either an adopted housing requirement or the minimum Local Housing Need, as calculated using the Standard Methodology. Further updates on this will be provided through future 5YHLS reports.

3.2.8 The 2018 5YHLS report was produced whilst the Core Strategy 2011 remains the adopted Plan for the Borough. It therefore still assesses housing performance against the previous Core Strategy housing targets and these are reproduced here to demonstrate housing completion activity in recent years. The most recent HDT results also show completion rates.

3.2.9 Between 1st April 2017 and 31st March 2018, 149 additional dwellings were built within the Borough. This figure is lower than the annual target of 247 dwellings per year set out in the Core Strategy.

3.2.10 Table 2 below shows the housing delivery in previous years against the housing delivery target set out in the adopted Core Strategy.

Table 2: Number of houses built in previous years

Year	Completions		Core Strategy Housing Need Average (247 homes per annum)		Core Strategy Housing Trajectory	
	Actual Completions	Cumulative Completions since 2011	Annual Average of 247 houses	Cumulative annual average of 247 houses	Core Strategy Housing Trajectory	Cumulative Housing Trajectory
2011/2012	119	119	247	247	100	100
2012/2013	135	254	247	494	170	270
2013/2014	265	519	247	741	221	491
2014/2015	224	743	247	988	270	761
2015/2016	122	865	247	1235	270	1031
2016/2017	192	1057	247	1482	275	1306
2017/2018	149	1206	247	1729	275	1581

3.2.11 The housing completions figures for Rossendale within the previous three years show an under delivery of housing and therefore the Council should apply a 20% buffer to “improve the prospect of achieving the planned supply” as explained in the NPPF. This has also been identified in the latest HDT results.

3.2.12 As discussed earlier in section 2 of this topic paper, the local housing need for Rossendale in the Local Plan is 212 additional dwellings per year. This amounts to 1,060 dwellings for year one to five of the Plan period. Adding a 20% buffer, the minimum number of dwellings to be provided within the first five years of the plan becomes 1,272 dwellings.

Planning Commitments

3.2.13 As of 1st April 2018, 77 housing sites were under construction within the Borough, with a total of 433 new homes expected to be built on these sites (417 within the next five years). In the same period, 62 sites had either an extant (current) full or outline planning permission, reserved matters approval or a certificate of lawfulness for residential use. This amounted to a total of 365 additional dwellings, with 291 of these expected to be delivered in five years. In addition, one site was granted approval for 100 dwellings, subject to the signing of a legal agreement. It is expected that 80 of these dwellings can be delivered within the next five years.

3.2.14 Therefore the total number of homes likely to be delivered within the next five years based on sites under construction that are currently active, sites with planning permissions and a site where the permission is subject to the signing of a legal agreement amounts to 898 dwellings. Of these, 824 are expected to be delivered between 2018/19 and 2022/23.

Small sites allowance

3.2.15 The SHLAA only includes sites of five or more dwellings within the assessment. This is in line with national guidance as it is recognised that it is difficult

and resource intensive to specifically identify and assess the future potential of such small sites. Any small sites that have actually come forward in the past however have been monitored and an assessment can be made of past completion rates on these sites. This can be used to identify the amount of housing that could be delivered on such sites in future as part of a small sites allowance. The previous delivery on these small sites is shown in Table 8.

Table 3: Dwellings completed on small sites

Year	Total number of houses completed on small sites (1 to 4 dwellings)	Number of houses completed on small sites (1 to 4 dwellings) excluding private garden	Total number of dwellings completed within the Borough	% of completion on small sites (1 to 4 dwellings) excluding private garden
2010/2011	5	5	74	7
2011/2012	10	8	119	7
2012/2013	12	11	135	8
2013/2014	48	46	265	17
2014/2015	19	16	224	7
2015/2016	12	11	122	9
2016/2017	23	20	192	10
2017/2018	27	26	149	18
Total	156	143	1280	
Average	20	18	160	11%

3.2.16 On average, around 11% of the dwellings delivered in the Borough are built on small sites (between 1 and 4 dwellings) excluding developments in private gardens. Small sites have contributed an average of 18 dwellings per year over this analysis period.

3.2.17 The Council assumes that the delivery on small sites will continue in the future but this is not currently captured within the land supply assessed in the SHLAA nor in sites proposed to be allocated in the Local Plan. Some small sites already have planning permission and are identified in the five year supply. As these are likely to be delivered in the next 3 years, the small site windfall allowance should only be applied to the last 2 years of the five year housing land supply (and on an annual basis thereafter). This will avoid duplication and double counting within the early Plan period. Table 9 below shows the small site allowance considered within different periods.

Table 4: Dwellings expected to be delivered between April 2018 and March 2023 on sites with planning commitments and considering a small site windfall allowance

Dwellings to be delivered in the next five years (2018/19 to 2022/23)	Number of dwellings
Sites under construction	417
Sites with planning permission	291
Site granted permission subject to the signing of a legal agreement	80
Small site windfall allowance (18 per year)	36
Total	824

3.2.18 In conclusion, the number of new homes to be delivered in the five year period set out in the latest 5YHLS report (1st April 2018 – 31st March 2023) including the number of dwellings remaining to be built on sites under construction, sites with planning permission, sites granted permission subject to signing of local agreement and dwellings expected to be built on small sites based on previous delivery, amounts to 824.

3.2.19 The current supply of land is below the target of 1,272 when assessed against an annual housing requirement of 212 houses and a 20% buffer.

3.2.20 The following section will discuss how sites were identified for housing allocation in the various stages during the preparation of the Local Plan, including any changes which were made as a result of consultation. This should be read in conjunction with the site selection explanation set out in Annex 1.

4 Comments received during the draft Local Plan consultation and changes made to site allocations

4.1 Draft Local Plan previous Site Allocations

4.1.1 The draft Local Plan (Regulation 18) identified 137 sites as housing allocations. This included sites which already had planning permission and identified a supply of 3,622 houses.

4.1.2 Amongst those allocations 22% of the units (786 dwellings) were proposed on sites with a current Green Belt status, while 38% (1,388 dwellings) were proposed on sites currently within the countryside. The remaining 40% (1,448 dwellings) were proposed on sites currently within the urban area.

4.1.3 Furthermore, 16% of the number of units (583 dwellings) proposed were on brownfield sites, 15% (532 dwellings) on mixed (brownfield and greenfield) sites and 69% (2,507 dwellings) on greenfield sites. Table 5 below provides a summary of the previous housing site allocations at Regulation 18 stage.

Table 5: Summary of the draft Local Plan housing site allocations at regulation 18 (including mixed sites)

Previous Housing Site Allocations (Regulation 18)	Total	Urban area	Countryside	Green Belt	Brownfield Sites	Mixed Sites	Greenfield Sites
Number of dwellings	3622	1448	1388	786	583	532	2507
% of dwellings	100%	40%	38%	22%	16%	15%	69%

Feedback from the consultation

4.1.4 Following the consultation, a number of issues and constraints were identified for some of the sites by statutory consultants, landowners and residents. This resulted in a number of sites being withdrawn and two other previous allocations have been merged into one. The list of sites withdrawn is presented in Appendix B.

4.1.5 The comments received were published on the Council’s website. A summary of the key issues raised and the Council’s response is set out in the Statement of Consultation report.

4.1.6 During and after the consultation, additional sites for development were proposed. These sites have been assessed in the SHLAA 2018 update. Four of these additional sites were then proposed for allocation in the publication version of the Local Plan and two now form extensions to previous allocations.

Update on sites with planning permissions being built out for housing

4.1.7 Seven sites previously proposed in the draft local Plan have now been completed, or are likely to be completed before the adoption of the Local Plan, and were therefore removed from the site allocations.

4.2 Pre-submission Publication version of the Local Plan (Regulation 19)

Housing allocations in the Pre-submission Publication version

4.2.1 74 sites are proposed for housing allocations in the Local Plan, together with 3 mixed-use sites which include some residential units - leading to a total of 77 sites. Another mixed-use site is proposed to include a Gypsies and Travellers transit site.

4.2.2 The sites proposed for housing allocation are presented in Appendix C. The site area, number of dwellings and density have been updated since the Regulation 18 consultation based on comments received during the consultation, also to take account of new sites proposed during and after the consultation, as well as updated

information on planning applications and consideration of increasing the density on brownfield sites.

4.2.3 It should also be noted that the site boundaries shown for each site do not necessarily reflect the developable area of the site. For example, a proportion of any site may need to accommodate open space, landscaping or other amenity areas, there may be a need for land to be left aside to act as a buffer between new housing and existing adjacent land uses, to protect the setting of heritage assets or parts may remain undeveloped to avoid any flood risk. Wherever possible, however, the actual number of units on each site has been calculated following identification of the net developable area which is why the density may appear relatively low on some sites.

4.2.4 The Council’s approach to housing site allocations was to focus first on brownfield sites or mixed sites and then to allocate greenfield sites. Development within the urban area was also prioritised. However, due to the lack of sites that were identified as available, suitable and achievable for housing, it has been necessary to allocate sites within the countryside and the Green Belt to meet the housing needs of the Borough. The Policies Map therefore shows proposed changes to the Urban Boundary and the Green Belt to allow future development. The topic papers on the overall strategy and the Green Belt release provide further information on this matter.

4.2.5 The 77 housing and mixed use sites are proposed to deliver 2,853 additional homes within the Plan period (2019 to 2034). This number is based on the estimated yield of the number of dwellings identified in the Local Plan. Some of the allocated sites have planning permission and are already accounted for in the five year housing land supply (if the permission remains extant). In some cases, the planning permission may only be on part of the site and the new allocation includes it within a larger area. Others may support a higher number of dwellings than the permission states if a new proposal was to come forward on the site. The list of allocated housing sites which had planning permission for housing at the time of the Local Plan preparation are listed in Table 6 below.

Table 6: Housing allocations with planning permission for housing

Housing Allocation Ref.	Site name	No. of units proposed in the Local Plan	Delivery Timescale	Allocation	Number of dwellings with planning permission or left to be built as of 1 st April 2019
Rawtenstall, Crawshawbooth, Goodshaw and Loveclough					
H2	Magistrates Court, Rawtenstall	11	Years 1-5	Housing	11
H9	Land off Oaklands and Lower Cribden Avenue	31	Years 1-5	Housing	31
H11	The Hollins, Hollin Way	70	Years 1-15	Housing	57
H12	Reedsholme Works, Rawtenstall	110	Years 1-5	Housing	107

H13	Loveclough Working Mens Club and land at rear and extension	95	Years 1-5	Housing	10
H19	Land off Lower Clowes Road, New Hall Hey	7	Years 6-10	Housing	6
cup, Stacksteads, Britannia and Weir					
H22	Former Bacup Health Centre	22	Years 1-5	Housing (Special needs)	22
H23	Glen Mill, 640 Newchurch Road, Stacksteads	9	Years 1-5	Housing	9
H24	The Former Commercial Hotel, 318A, 316B and 316C Newchurch Road	7	Years 1-5	Housing	7
H26	Land off Greensnook Lane, Bacup	26	Years 1-5	Housing	33
H36	Hare and Hounds Garage, Newchurch Road, Stacksteads	9	Years 6-10	Housing	9
H38	Land off Burnley Road and Meadows Avenue, Bacup	6	Years 6-10	Housing	6
H44	Irwell Springs, Weir	46	Years 1-5	Housing	46
Haslingden and Rising Bridge					
H45	Former Haslingden Police Station, Manchester Road	8	Years 1-5	Housing	8
Waterfoot, Lumb, Cowpe and Water					
H53	Waterfoot Primary School	21	Years 1-5	Housing (Special needs)	20
H54	Land at Ashworth Road, Water	6	Years 1-5	Housing	6
H59	Land Adjacent Dark Lane Football Ground	80	Years 1-5	Housing	100
Whitworth, Facit and Shawforth					
H65	Albert Mill, Whitworth	49	Years 1-5	Housing	49
H67	Land Behind Buxton Street	28	Years 1-5	Housing (Special needs)	28
H68	Former Spring Mill (land off eastgate and westgate)	111	Years 1-10	Housing	45
Mixed-use including residential					
M2	Spinning Point, Rawtenstall	28	Years 1-5	Mixed-use	28
	TOTAL	780			638

4.2.6 Table 7 sets out how many dwellings are to be delivered on both allocated and other committed sites as of 1st April 2018.

Table 7 No. of dwellings in the housing land supply

		No. of dwellings
A	No. of dwellings on allocations with planning permission (actual no. of dwellings granted permission)	638
B	No. of dwellings on allocations with planning permission (based on estimated yield in Local Plan)	780
C	No. of dwellings on allocations without planning permission (based on estimated yield in Local Plan)	2073
D	No. of dwellings on other committed sites*	260
E	Total no. of dwellings in the overall housing land supply on sites with planning permission (allocated and not allocated) and other allocated sites A+C+D	2971
F	Total No. of dwellings in the overall housing land supply on allocated sites (based on estimated yield in the Local Plan) and other committed sites B+C+D	3113

*Remaining capacity on sites under construction or with planning permission that are not allocated in the Local Plan

Brownfield and Mixed Sites

4.2.7 Due to the constraints associated with developing brownfield sites, which include viability, flood risk and land contamination, the proportion of allocated brownfield sites for housing is relatively low at 30%. 10% of the sites allocated are 'mixed', meaning 60% of the sites proposed for housing allocation are on undeveloped (greenfield) sites.

Table 8: Summary of the proposed housing allocations on brownfield, mixed and greenfield sites

Housing Site Allocations (Regulation 19)	Total	Brownfield Sites	Mixed Sites	Greenfield Sites
Number of allocation sites	77	23	8	46
% of sites	100%	30%	10%	60%

4.2.8 The density of development on brownfield sites has been maximised as much as possible to reduce the need to allocate greenfield sites. The average density of development on the 23 proposed brownfield sites allocations is approximately 100 dwellings per hectare. This is higher than the average density of the brownfield sites proposed in the Regulation 18 version of the Plan, which was approximately 90 dwellings per hectare. The density on the following sites has been increased: Reedsholme Works in Rawtenstall and Greenbridge Mill in Rawtenstall.

4.2.9 The same number of mixed greenfield/brownfield sites is proposed as in the previous version of the Local Plan (8 sites). Again, the density has been maximised wherever possible and especially if the site is close to good public transport connections. The average density of development on these sites has slightly increased from 29 to 34 dwellings per hectare, since the draft version of the Local Plan.

Urban Boundary, Countryside and Green Belt

4.2.10 Sites situated within the Urban Boundary were prioritised for housing allocations. However the number of sites identified as being deliverable or developable for housing based on the SHLAA and other studies such as the SFRA, Landscape Assessment, Heritage Impact Assessment, Green Belt Review and Viability Study was not enough to meet the local housing need for the Borough. Therefore, housing allocations are proposed for sites currently within the countryside and the Green Belt with changes proposed to the Urban Boundary and the Green Belt to allow for future development.

4.2.11 68% of the sites proposed for housing allocation are currently situated within the Urban Boundary. 26% of the sites are currently situated within the countryside but it is proposed to change the Urban Boundary as shown on the Policies Map, so that these sites will be incorporated in the settlement boundary. 6% of the sites are currently situated within the Green Belt and it is proposed to release those sites from the Green Belt as shown on the Policies Map. Amongst the 5 Green Belt sites, 4 are brownfield or mixed sites (H69 Cowm Water Treatment Works, H70 Irwell Vale Mill, H71 Land east of Market Street, Edenfield and H73 Edenwood Mill) and one is

greenfield (H72 Land west of Market Street). In terms of the proportion of allocations on this amounts to around 18% of dwellings on allocated sites on Green Belt.

Table 9: Summary of housing allocations within the Urban Boundary, countryside and Green Belt

Housing Site Allocations (Regulation 19)	Total	Urban Boundary	Countryside	Green Belt
Number of allocation sites	77	52	20	5
% of sites	100%	68%	26%	6%

4.3 Other Considerations

Timescale of delivery

4.3.1 The Local Plan provides a housing trajectory within Appendix 4 showing the estimated number of dwellings to be delivered within the Plan period on allocated sites. This shows that 1,640 dwellings are likely to be delivered between year one and year five of the plan period (2019 to 2024). Therefore, even without taking account of other sites in the housing land supply that have permission, the Local Plan is allocating enough sites to provide a healthy housing land supply for the first five years.

Allocation of Smaller Sites

4.3.2 The NPPF states that the Local Plan should allocate at least 10% of the housing requirement on sites that are no larger than one hectare. There are 48 allocated sites that are one hectare or below. This makes up approximately 62% of the total number of sites (or 18% of the net developable area of housing land proposed). In relation to the number of dwellings, this equates to 24% of dwellings on allocated housing land being proposed on sites of one hectare or less.

5. Conclusion

5.1 This topic paper discussed the housing need for the Borough and the land supply identified to meet this need within the Local Plan period.

5.2 The local housing need for the Borough is 212 dwellings per annum or 3,180 dwellings over the 15 years plan period (2019 to 2034). Also, housing need for specific groups within the community has been identified, including elderly people, people with disabilities and rural communities. Further detail on the specific breakdown of housing need will be provided as the Plan progresses and will be provided in subsequent updates.

5.3 To address the housing need, the Local Plan proposes to allocate 2,853 dwellings on allocated sites. This will be supplemented by additional supply from other sources. The other sources include new homes from sites that are not specifically allocated such as: the remaining capacity on sites that are already under construction, planning permissions on sites providing less than 5 dwellings and any new planning permissions on sites that haven't previously been anticipated/identified as being available for housing. Such land may include, for example, conversion or changes of use from other uses or sites where previously identified constraints can be overcome.

5.4 The Local Plan policies sets a target of 30% of on-site affordable housing for sites of 10 dwellings or more, subject to the site's viability, as well as 20% of new homes to be made accessible for elderly or people with disabilities. Furthermore, the Local Plan requests 100% of affordable housing on rural exception sites, as well as affordable housing as part of the large site allocation in Edenfield, to seek to meet the needs of rural communities in accessing affordable homes.

ANNEX 1 – SITE SELECTION PROCESS FOR LOCAL PLAN HOUSING ALLOCATIONS

1. Introduction

1.1 This Annex will set out more detail on the approach the Council has taken to the designation of housing allocations (including mixed-use sites which have an element of housing) within the Local Plan. The designation of sites for Gypsies and Travellers is discussed in the Gypsy and Traveller Topic Paper. Further detail on site selection can also be found in the Flood Risk and Sequential Test Topic Paper.

1.2 The proposed allocations shown on the draft Policies Map aim to provide a supply of land to meet the housing and employment need within the Local Plan period. Development within the Borough is heavily constrained by the topography, flood risk within the valley and a road network operating close to capacity. It is also estimated that almost a quarter of the Borough is designated as Green Belt.

2. Housing Site selection for the Local Plan

Site selection for Regulation 18 version of the draft Local Plan

2.1 The site selection process for this Local Plan started in 2016. To a large extent it used as a starting point, the work undertaken for the now withdrawn Part 2 document which had sought to allocate sites in accordance with the 2011 Core Strategy. The new review considered land availability, specific site characteristics and the overall strategy for Rossendale. The housing site allocations proposed in the Regulation 18 version of the draft Local Plan were informed by using the following Evidence Base studies and other supporting documents:.

- Environmental Network Study (2017)
- Green Belt Review (2016)
- Habitat Regulations Assessment (HRA) of the draft Local Plan (Regulation 18)
- Heritage Impact Assessment of Housing Sites (2017)
- Lancashire County Council Highways Department - information obtained from
- Landscape Study (2015)
- Local Plan Viability Study (2015)
- Playing Pitch Strategy (2016)
- Strategic Flood Risk Assessment (SFRA) 2016
- Strategic Housing Land Availability Assessment (SHLAA) 2017
- Sustainability Appraisal (SA) of the Rossendale Local Plan – Reasonable Alternatives (2017)

2.2 The SHLAA provides an understanding of the land supply for potential housing within the Borough. It incorporates information from the SFRA, the Viability

Study and the Landscape Study. The SHLAA identifies “deliverable” (e.g. sites that could be delivered in the next five years) or “developable” sites (e.g. sites that could be developed at a certain point in time, in this case 6 to 15 years). Those deliverable and developable sites formed the starting point to select the most suitable sites for allocation within the local plan.

The approach taken to the identification of sites for the SHLAA was on a “policy-off” basis. Sites were then considered with regard to the Spatial Strategy and by reference to the Sustainability Appraisal and other Evidence Base work.

2.3 Based on an assessment of sites with no planning permissions at the time the SHLAA was carried out (March 2017), the overall supply of land including brownfield and greenfield sites situated in the Urban Boundary, Countryside or Green Belt is shown in Table 1:

Table 1: Land supply from sites with no planning permission as of March 2017 identified in the SHLAA (2017)

SHLAA Sites with no planning permission as of March 2017	Number of sites	Dwellings expected to be completed in years 1 to 5 (2018 to 2022)	Dwellings expected to be completed in years 6 to 15 (2023 to 2032)
Land supply from deliverable and developable sites without planning permission as of March 2017	302	1,266	5,156

2.4 It is important to note that as set out in the Housing and Economic Land Availability Assessment guidance that “not all the sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable)”.

2.5 Sites with planning permission were not considered as part of the SHLAA (2017) to avoid double counting with sites included in the 5 Year Housing Land Supply report (2017). Additionally these sites have already been assessed through the planning application process and, assuming the permission is relatively recent, are deemed to be suitable for housing by virtue of the grant of planning permission.

2.6 In effect, the total land supply is composed of sites assessed as being suitable, available and achievable (i.e. SHLAA sites without permission) and from other sites included the 5 Year Housing Land Supply (with permission). The housing allocations are comprised of a combination of these. The 5 Year Housing Land Supply does include land that will deliver fewer than 5 dwellings. Small sites such as this have

not been allocated specifically in the Local Plan but do form part of the overall housing land supply.

2.7 According to the SHLAA, only approximately 1,200 dwellings could be delivered on sites within the Urban Boundary. The remaining dwellings would be provided on sites within the countryside or Green Belt. Table 2 provides further information.

Table 2: Location of sites without planning permissions as of March 2017 assessed in the SHLAA (2017)

Dwellings expected from SHLAA Sites with no planning permission as of March 2017	Urban Boundary	Countryside adjoining the Urban Boundary	Countryside not adjoining the Urban Boundary	Green Belt adjoining the Urban Boundary	Green Belt not adjoining the Urban Boundary	Total
Deliverable sites	665	384	68	105	44	1,266
Developable sites	578	2,148	316	1,810	304	5,156
Land supply from deliverable and developable sites without planning permission as of March 2017	1,243	2,532	384	1,915	348	6,422

2.8 Furthermore, the SHLAA showed that almost 5,000 dwellings could be provided on greenfield sites, compared with fewer than 400 on brownfield sites and just over 1,000 on mixed sites. Table 3 below shows the distribution of the dwellings.

Table 3: Status of sites (e.g. Brownfield, Greenfield or Mixed) without planning permissions as of March 2017 assessed in the SHLAA (2017)

Dwellings expected from SHLAA Sites with no planning permission as of March 2017	Greenfield	Brownfield	Mixed	Total
Deliverable sites	887	248	131	1,266
Developable sites	4,109	143	904	5,156
Land supply from deliverable and developable sites without planning permission as of March 2017	4,996	391	1,035	6,422

Sites within the existing Urban Boundary

2.9 The number of units that could be delivered on sites within the Urban Boundary was not enough to accommodate the housing need of the Borough during the plan period and therefore sites within the countryside had to be considered.

2.10 It is important to note that not all the sites situated within the Urban Boundary were considered for allocation for a range of reasons. For example, this may have been because the site was in use or protected for employment, development of the site could have significant impact on heritage assets (or it was considered that the site should remain as a community green space).

Sites within the countryside

2.11 Sites situated within the countryside but not adjoining the Urban Boundary were not considered to be within a sustainable location as they would often be situated far away from local services and public transport. These were therefore discounted and countryside sites adjoining the Urban Boundary were considered the more suitable sites to consider for allocation within the Local Plan.

2.12 The Landscape Assessment study was an important consideration when selecting sites for potential allocation within the countryside. Indeed, due to the nature of the valley such sites are often situated in locations within or close to the moorland fringe. In some cases sites were proposed for allocation despite being identified as having potential landscape impact as it was thought that this could be satisfactorily addressed. For example, by reducing the density of the site and/or providing additional landscaping within the site.

2.13 Certain sites within the countryside but adjoining the Urban Boundary have not been proposed for allocation due to constraints such as:

- vehicular access issues;
- landscape impact;
- willingness of the landowners to develop the site;
- deliverability issues based on the constraints identified;
- assessment from the Sustainability Appraisal;
- environmental impacts based on the location of the Ecological Networks and the information from the Environmental Network Study.

2.14 The number of sites situated in the countryside adjoining the Urban Boundary (but not designated as Green Belt) that were identified as being suitable and available still did not provide a sufficient amount of dwellings to meet the housing need for the Borough within the Local Plan period. Therefore, Green Belt sites had to be considered for potential housing allocations.

Sites within Green Belt

2.15 Previously developed sites situated within the Green Belt were considered first, such as Edenwood Mill and Irwell Vale Mill. It is to be noted that Irwell Vale Mill was assessed as not developable within the SHLAA, as it is partly situated within flood zone 3. However, after further discussion with the Environment Agency it was considered that there is a possibility to develop the site without increasing the risk of flooding at the site and further downstream. Therefore, the site was proposed as a potential housing allocation.

2.16 The next stages was to look at sites identified within the Green Belt review as potential sites for release from the Green Belt. The Green Belt Topic Paper discusses the exceptional circumstances in respect of changes to the Green Belt.

2.17 After inclusion of Green Belt sites, the housing site allocations proposed within the Regulation 18 version of the draft Local Plan could deliver 3,622 dwellings during the local plan period (2019 to 2034).

Changes made to the site allocations for the Pre-Submission Publication Version (Regulation 19) published in August 2018

2.18 During the consultation on the draft local Plan (Regulation 18 consultation), over 3,000 comments were received from more than 1,700 individuals and organisations. Based on the information received, changes to the site allocations have been made.

2.19 The changes to the proposed site allocations are discussed in the Statement of Consultation as well as main body of the Housing Topic Paper.

2.20 It is to be noted that the evidence base and supporting documents have been updated to inform the site allocations as proposed in the Pre-Submission Publication version of the Local Plan including:

- Strategic Housing Land Availability Assessment (2018)
- Sustainability Appraisal of the Pre-Submission Publication version of the Local Plan (2018)
- Habitats Regulation Assessment of the Pre-Submission version of the Local Plan (2018)

2.21 The Local Plan currently identifies 74 housing site allocations and 3 mixed-use sites with an element of residential use that could deliver 2,853 dwellings during the Local Plan period. These housing site allocations within the Local Plan are expected to deliver 2,853 dwellings during the Local Plan period. After considering the planning commitments which have not been allocated and a small sites windfall allowance (18 dwellings per year), the Council is able to demonstrate that the land supply can meet the need for housing during the local plan period.

APPENDIX A - LOCAL HOUSING NEED CALCULATIONS

The following provides a step by step breakdown of the calculation used in the Government's Standard Methodology for identifying housing need. It demonstrates how the Local Plan housing need figure was identified, using the proposed methodology available when the Local Plan was being prepared. As set out in Section 2, this is still considered to accord with the latest guidance on calculating housing need.

Step 1 – Setting the baseline

The household projections to be used are the 2014- based figures published on the www.gov.uk website (table 406).

Rossendale's household projections are:

- Number of households in 2016: 30,115
- Number of households in 2026: 31,984

The total number of new households is 1,869 over the ten year period, equivalent to 186.9 household growth per year.

Step 2 –An adjustment to take account of market signals

The ratio of median house price to median gross annual workplace –based earnings for Rossendale in 2016 is 6.14.

The adjustment factor is calculated below:

$$\text{Adjustment factor} = \frac{(\text{Local affordability ratio} - 4)}{4} * 0.25 = \frac{(6.14 - 4)}{4} * 0.25 = 0.13375$$

The adjustment factor is 0.13375 and is used to calculate the local housing need as shown below:

Local housing need = (1+ adjustment factor) * projected household growth

Local housing need = (1+0.13375) * 186.9 = 211.89

Local housing need for Rossendale between 2016 and 2026, based on 2016 affordability ratio (6.14) is 211.89 rounded at 212 houses per year.

Step 3 – Capping the level of any increase

The cap does not limit the minimum annual local housing need figure for Rossendale. The Council adopted the Core Strategy in 2011, more than 5 years ago, and have not reviewed the housing requirement figure since then.

- The average annual housing requirement figure in the existing Core Strategy is 247 a year
- The average annual household growth over ten years is 186.9 (as per step 1)
- The minimum annual local housing need figure is 211.89 (as per step 2)
- The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:

$$\text{Cap} = 247 + (40\% * 247) = 247 + 98.8 = 345.8$$

The capped figure is greater than the minimum annual local housing need figure and therefore the minimum figure for Rossendale is 211.89 or rounded as 212 houses per year.

APPENDIX B – SITES FROM THE DRAFT LOCAL PLAN (REGULATION 18) NOT GOING FORWARD

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
HS2.2	Land near Greensnook Farm	0.11	0.11	7	Year 1-5	Brownfield	UB	Housing	Site not going forward	Yes			Under construction. Dwellings to be completed by the end of 2018 or beginning 2019
HS2.11	Land at Huttock Farm, Bacup	0.74		22	Years 6-15	Mixed	CS	Housing	Site not going forward	No			Concerns from Lancashire County Council regarding highways
HS2.12	Huttock Top, Bacup	1		30	Years 6-15	Greenfield	UB	Housing	Site not going forward	No			Concerns from Lancashire County Council regarding highways
HS2.13	Land south of Huttock Top Farm, Bacup	1.34		40	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Concerns from Lancashire County Council regarding highways
HS2.20	Land off Douglas Road, Bacup	1.09		27	Years 1-5	Greenfield	UB	Housing	Site not going forward	Completed			Now completed
HS2.27	Land adj 83 Booth Road, Tunstead	0.14		5	Years 1-5	Mixed	GB	Housing	Site not going forward	2017/0423			Outline (2017/0423) for a single dwelling - below the Local Plan threshold for allocation
HS2.29	Land west of Sow Clough, Stacksteads	1.21	1.08	32	Years 6-15	Greenfield	CS	Housing	Site not going forward	No	464	300m	Lancashire County Council highways objection and landowner intentions unknown
HS2.32	Land off Newchurch Old Road	1.57		47	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Concerns from Lancashire County Council regarding highways
HS2.34	Land Rear of Highfield Nursing Home	0.25		2	Years 1-5	Greenfield	UB	Self-Build	Site not going forward	Yes for 2 dwellings			Potential land contamination, historic landfill (EA). Existing permission for 2 dwellings, below the Local Plan threshold for allocation.

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
HS2.39	Land at Holme Lane, Haslingden	0.18	0.18	5	Years 6-15	Greenfield	GB	Housing	Decision not yet taken	No	X41 and 464	300m	Green Belt not identified for release in the Green Belt Review.
HS2.44	Land at Hollin Lane, Rawtenstall	2.59		51	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Access issue via Hollin Lane which is a narrow single lane with no possibility of widening
HS2.54	Land Between Newchurch Road and Bacup Road and to the west of Dobbin Lane	5.63	1.83	82	Years 1-5	Greenfield	UB	Housing	Site not going forward	No			LCC: could not accommodate 55 houses. Badger setts present on site. Objection from Valley Heritage, Rossendale Valley Gateway Club. Highways England state should be assessed within Highways Capacity Study. Potential land instability.
HS2.56	Land at Hurst Platt, Waingate Road	0.15		8	Years 1-5	Greenfield	UB/CS	Housing	Site not going forward	Under construction			Half complete. 4 houses remaining which is below Local Plan threshold for allocation
HS2.57	Land at Conway Road	0.25	0.16	5	Years 1-5	Greenfield	CS	Self-Build	Site not going forward	No			Assessment identified the site would not accommodate 5 units therefore below Local Plan threshold for allocation.
HS2.58	Land At Higher Cloughfold	0.25		7	Years 6-15	Greenfield	CS	Self-Build	Site not going forward	No			Likely to be too small to deliver 5 or more houses. Vehicle access issues.
HS2.59	Land to the north side of Hall Carr Road	0.3		5	Years 1-5	Mixed	UB	Self-Build	Site not going forward	No			Site too small to deliver 5 or more dwellings. Interest for 1 self-build home.
HS2.60	Haslam Farm, north	1.63	0.71	21	Years 1-5	Greenfield	GB	Housing	Site not going forward	No			Stepping stone habitat. Landowner

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
	of Duckworth Lane								forward				wants expansion to south. Objection from ELR Ltd. Strong objection from Residents and Friends of Townsend Fold (petition). Significant underground infrastructure limiting development. Green Belt
HS2.62	Former Hospital, Haslingden Road	1.87		41	Years 1-5	Brownfield	GB	Housing	Site not going forward	Almost completed			Site already completed
HS2.64	Land at Oakenhead Wood, Rawtenstall	0.75		22	Years 1-5	Greenfield	CS	Housing	Site not going forward	No			LCC objection due to unsuitable vehicle access
HS2.66	Land behind no. 173 to 187 Haslingden Old Road	0.45		13	Years 1-5	Greenfield	CS	Housing	Site not going forward	No			LCC objection due to unsuitable vehicle access
HS2.68	Land east of Lower Clowes Road	0.19	0.19	5	Years 6-15	Brownfield	CS	Housing	Site not going forward	No			Willing landowner (call from agent regarding planning application). Delivery can move to 1 to 5 years, but could deliver less than 5 dwellings. Keep UB change to allow windfall development
HS2.71 (part)	Land to the west of Moorland View	2.63	2.63	45	Years 6-15	Greenfield	GB	Housing	Site not going forward				Not identified as a Green Belt release; issues over multiple land ownership
HS2.72	Croft End, Stubbins	0.8	0.8	11	Years 1-5	Brownfield	UB	Housing	Site not going forward	Yes (2016/0228)	X41	300m	Likely to be completed before the adoption of the Local Plan
HS2.75	Wavell House	0.25		32	Years 1-5	Brownfield	UB	Housing	Site not going forward	Under constructio			Near completion (30 dwellings built)

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
										n			
HS2.76	Land at Snig Hole, Helmshore	0.25		7	Years 1-5	Greenfield	GB	Housing	Site not going forward	No			One landowner requests withdrawal of site. Objection from Helmshore Local History Society and 77 resident objections.
HS2.77	Land Off Curven Edge	0.18		5	Years 1-5	Greenfield	UB	Housing	Site not going forward	No			Land contamination (EA). Recreational use. 58 resident objections
HS2.79	Rosendale Golf Club, Haslingden	0.58	0.52	15	Years 6-15	Greenfield	GB	Housing	Housing	No	X41	300m	Not identified for GB release.
HS2.84	Land behind Myrtle Grove Mill, Waterfoot	3.57	1.35	40	Years 6-15	Greenfield	CS	Housing	Site not going forward	No	464	300m	Landowner intentions unknown. 2 resident objections. Access issues
HS2.86	Land by St Peter's School	0.32	0.32	9	Years 6-15	Mixed	CS	Housing	Site not going forward	No			Willing landowner. Objection from Valley Heritage due to landscape impact and access and 5 resident objections. Western boundary of the site should be along the track (conservation officer). Not going ahead with UB change.
HS2.88	Former Kearns Mill	1.01		14	Years 1-5	Brownfield	CS	Housing	Site not going forward	Under construction			Near completion
HS2.91	Park Road Garage Site	0.36		11	Years 1-5	Mixed	UB	Housing	Site not going forward	No			Drainage issues, culvert, garage colony in use. 2 resident objections

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
HS2.92	Field at Scout Road, Whitewell Bottom	0.17	0.17	5	Years 1-5	Mixed	CS	Housing	Site not going forward	No			Willing landowner. EA: flood zone 2. Too small to deliver 5 or more dwellings, keep small scale UB change for windfall development.
HS2.98	Land south of Shawclough Road, Scout Bottom	1.08		32	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			EA: main river, flood zone 3 and 2. some willing landowners
HS2.99	Land South of Isle of Man Mill	2.12	1.58	47	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Intentions of landowner unknown. Landscape impact.
HS2.10 1	Waterhouse, Cowpe	0.09	0.07	5	Years 6-15	Brownfield	CS	Housing	Site not going forward	No			Willing landowner. EA: main river, flood zone 3 and 2. Too small to deliver 5 houses. Keep boundary change to facilitate windfall development.
HS2.10 4	Land south of Quarry Street, Shawforth	0.53	0.53	16	Years 6-15	Mixed	GB	Housing	Decision not yet taken	No	464	300m	25% owned by LCC remaining (intentions unknown) part in unknown ownership. Strong objection from residents (63) and drainage issues. Objection from Whitworth Action Group. Identified for GB release.
HS2.10 6	Land to the east of Tonacliffe School	3.14	2.27	68	Years 6-15	Greenfield	GB	Housing	Housing	No	464	300m	Willing landowner and developer. Strong community objection. Not identified for GB release.
HS2.10 9	Site of Horsefield Avenue, Tonacliffe	2.42	1.75	52	Years 6-15	Greenfield	GB	Housing	Housing	No	464	300m	Willing landowner and developer. Strong community objection. Not identified for GB release.

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Public Transport Route number or Hub name	Public Transport Buffer (crow fly)	Notes and Reasons for Not Taking Site Forward to Regulation 19
Total		41.19	31.87	891									

APPENDIX C – PROPOSED HOUSING SITE ALLOCATIONS FOR THE PUBLICATION (PRE-SUBMISSION) VERSION OF THE LOCAL PLAN

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
Rawtenstall, Crawshawbooth, Goodshaw and Loveclough										
H1	Greenbridge Mill (Hall Carr Mill) Lambert Haworth	1.28	64	50	Years 1-5	Brownfield	Housing	HS2	HS2.81	SHLAA16176
H2	Magistrates Court, Rawtenstall	0.02	11	550	Years 1-5	Brownfield	Housing	HS2	HS2.63	SHLAA16373
H3	Land at former Oakenhead Resource Centre	0.69	19	28	Years 1-5	Brownfield	Housing	HS2	N/A	SHLAA18422
H4	Turton Hollow, Goodshaw	1	30	30	Years 1-5	Mixed but largely greenfield	Housing	HS2	HS2.50	SHLAA16220
H5	Swinshaw Hall, Loveclough	1.72	47	27	Years 1-5	Greenfield	Housing	HS2	HS2.47	SHLAA16203; SHLAA16205 and SHLAA16207
H6	Land south of 1293 Burnley Road, Loveclough	0.19	5	26	Years 1-5	Greenfield	Housing (Self Build)	HS18	HS2.48	SHLAA16209
H7	Land Adjacent Laburnum Cottages, Goodshaw	0.31	10	32	Years 1-5	Greenfield	Housing	HS2	HS2.51	SHLAA16197
H8	Oak Mount Garden, Rawtenstall	0.29	9	31	Years 1-5	Greenfield	Housing	HS2	HS2.60	SHLAA16317
H9	Land off Oaklands and Lower Cribden Avenue	1.57	31	20	Years 1-5	Greenfield	Housing	HS2	HS2.61	SHLAA16362
H10	Land at Bury Road, Rawtenstall	0.25	7	28	Years 1-5	Greenfield	Housing	HS2	HS2.65	SHLAA16404

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H11	The Hollins, Hollin Way	2.62	70	27	Years 1-15	Greenfield	Housing	HS2	HS2.42	SHLAA16188; SHLAA16361; SHLAA16360 and part of SHLAA16363
H12	Reedsholme Works, Rawtenstall	2.19	110	50	Years 1-5	Brownfield	Housing	HS2	HS2.43	SHLAA16190 and SHLAA16191
H13	Lovecough Working Mens Club and land at rear and extension	3.2	95	30	Years 1-5	Mixed	Housing	HS2	HS2.49	SHLAA16367 and SHLAA18213
H14	Hall Carr Farm, off Yarraville Street	1.07	26	24	Years 1-5	Greenfield	Housing	HS2	HS2.70	SHLAA16236
H15	Willow Avenue off Lime Tree Grove	0.35	10	29	Years 6-15	Greenfield	Housing	HS2	HS2.45	SHLAA16187
H16	Land East of Acrefield Drive	0.61	18	30	Years 6-15	Greenfield	Housing	HS2	HS2.46	SHLAA16189
H17	Land south of Goodshaw Fold Road	0.23	7	30	Years 6-15	Greenfield	Housing	HS2	HS2.52	SHLAA16219
H18	Carr Barn and Carr Farm	1.24	25	20	Years 6-15	Greenfield	Housing	HS2	HS2.67	SHLAA16240 and SHLAA16383
H19	Land off Lower Clowes Road, New Hall Hey	0.27	7	26	Years 6-15	Greenfield	Housing	HS2	HS2.69	SHLAA16244
Bacup, Stacksteads, Britannia and Weir										
H20	Old Market Hall, Bacup	0.16	16	100	Years 1-5	Brownfield	Housing	HS2	N/A	SHLAA18428
H21	Reed Street, Bacup	0.42	13	31	Years 1-5	Brownfield	Housing	HS2	HS2.18	SHLAA16060

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H22	Former Bacup Health Centre	0.2	22	110	Years 1-5	Brownfield	Housing (Special needs)	HS17	HS2.19	SHLAA16063
H23	Glen Mill, 640 Newchurch Road, Stacksteads	0.17	9	53	Years 1-5	Brownfield	Housing	HS2	HS2.25	SHLAA16112
H24	The Former Commercial Hotel, 318A, 316B and 316C Newchurch Road	0.04	7	175	Years 1-5	Brownfield	Housing	HS2	HS2.26	SHLAA16357
H25	Land at Blackwood Road, Stacksteads	1.37	41	30	Years 1-5	Mixed	Housing	HS2	HS2.24	SHLAA16109 and part of SHLAA16107
H26	Land off Greensnook Lane, Bacup	1.43	26	18	Years 1-5	Greenfield	Housing	HS2	HS2.1	SHLAA16053
H27	Land off Fernhill Drive, Bacup	0.15	5	33	Years 1-5	Greenfield	Housing	HS2	HS2.5	SHLAA16083
H28	Sheephouse Reservoir, Britannia	2.1	63	30	Years 1-5	Greenfield	Housing	HS2	HS2.15	SHLAA16040
H29	Land off Pennine Road, Bacup	2.8	84	30	Years 1-5	Greenfield	Housing	HS2	HS2.16	SHLAA16042 and SHLAA16043
H30	Tong Farm, Bacup	1.7	51	30	Years 1-5	Greenfield	Housing	HS2	HS2.17	SHLAA16047 and SHLAA16045
H31	Lower Stack Farm	0.32	10	31	Years 1-5	Greenfield	Housing	HS2	HS2.21	SHLAA16038
H32	Booth Road/Woodland Mount, Brandwood	0.35	10	29	Years 1-5	Greenfield	Housing	HS2	HS2.28	SHLAA16098
H33	Land off Rockcliffe Road and Moorlands Terrace, Bacup	3.22	63	20	Years 1-5	Greenfield	Housing	HS2	HS2.4	SHLAA16080 and SHLAA16081
H34	Land at Higher Cross Row, Bacup	0.53	17	32	Years 1-5	Greenfield	Housing	HS2	HS2.3	Part of SHLAA16065

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H35	Shadlock Skip, Stacksteads	0.72	22	31	Years 6-15	Brownfield	Housing	HS2	HS2.30	SHLAA16110
H36	Hare and Hounds Garage, Newchurch Road, Stacksteads	0.15	9	60	Years 6-15	Brownfield	Housing	HS2	HS2.31	SHLAA16353
H37	Land off Gladstone Street, Bacup	2.1	63	30	Years 6-15	Mixed	Housing	HS2	HS2.23	part of SHLAA16066
H38	Land off Burnley Road and Meadows Avenue, Bacup	0.13	6	46	Years 6-15	Greenfield	Housing	HS2	HS2.14	SHLAA16359
H39	Land off Cowtoot Lane, Bacup	5.93	151	25	Years 6-15	Greenfield	Housing	HS2	HS2.7	SHLAA18067
H40	Land off Todmorden Road, Bacup	2.98	53	18	Years 6-15	Greenfield	Housing	HS2	HS2.6	SHLAA16051; SHLAA16052 and SHLAA18419
H41	Thorn Bank, Bacup	1.55	46	30	Years 6-15	Greenfield	Housing	HS2	HS2.22	SHLAA16058
H42	Land south of The Weir Public House	1.77	52	29	Years 6-15	Greenfield	Housing	HS2	HS2.8	SHLAA16070
H43	Land west of Burnley Road, Weir	0.46	10	22	Years 6-15	Greenfield	Housing	HS2	HS2.9	SHLAA16071
H44	Irwell Springs, Weir	2.48	46	19	Years 6-15	Greenfield	Housing	HS2	HS2.10	SHLAA16073
Haslingden and Rising Bridge										
H45	Former Haslingden Police Station, Manchester Road	0.12	8	67	Years 1-5	Brownfield	Housing	HS2	HS2.36	SHLAA16329
H46	1 Laburnum Street	0.04	8	200	Years 1-5	Brownfield	Housing	HS2	HS2.41	SHLAA16374
H47	Land at Kirkhill Avenue, Haslingden	0.74	22	30	Years 1-5	Greenfield	Housing	HS2	HS2.33	SHLAA16319
H48	Land Off Highfield Street	0.45	13	29	Years 1-5	Greenfield	Housing	HS2	HS2.35	SHLAA16325
H49	Land adjacent 53 Grane Road	0.15	5	33	Years 1-5	Greenfield	Housing	HS2	HS2.40	SHLAA16388

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H50	Land Adjacent Park Avenue/Cricceth Close	1	30	30	Years 1-5	Greenfield	Housing	HS2	HS2.37	SHLAA16308
H51	Land to side and rear of Petrol Station, Manchester Road	0.16	6	38	Years 6-15	Brownfield	Housing	HS2	HS2.38	SHLAA16323
H52	Land to the rear of Haslingden Cricket Club	0.74	30	41	Years 6-15	Greenfield	Housing	HS2	N/A	SHLAA16284
Waterfoot, Lumb, Cowpe and Water										
H53	Waterfoot Primary School	0.4	21	53	Years 1-5	Brownfield	Housing (Special needs)	HS17	HS2.90	SHLAA16128
H54	Land at Ashworth Road, Water	0.06	6	100	Years 1-5	Brownfield	Housing	HS2	HS2.95	SHLAA16390
H55	Carr Mill and Bolton Mill, Cowpe	0.07	11	157	Years 1-5	Brownfield	Housing	HS2	HS2.87 and HS2.96	SHLAA16116 and SHLAA16117
H56	Knott Mill Works, Pilling Street and Orchard Works, Miller Barn Lane	0.06	5	83	Years 1-5	Brownfield	Housing	HS2	HS2.89	SHLAA16127
H57	Foxhill Drive	0.22	7	32	Years 1-5	Greenfield	Housing	HS2	HS2.94	SHLAA16147
H58	Land off Lea Bank	0.31	9	29	Years 1-5	Greenfield	Housing (Self Build)	HS18	HS2.80	SHLAA16166
H59	Land Adjacent Dark Lane Football Ground	1.95	80	41	Years 1-5	Mixed	Housing	HS2	HS2.82	SHLAA16159
H60	Johnny Barn Farm and land to the east, Cloughfold	4.55	80	18	Years 6-15	Greenfield	Housing	HS2	HS2.53	SHLAA16171 and part of SHLAA16393
H61	Hareholme, Staghill	0.33	9	27	Years 6-15	Greenfield	Housing (Self Build)	HS18	HS2.83	Part of SHLAA16161
H62	Land off Peel Street, Cloughfld	0.28	8	29	Years 6-15	Greenfield	Housing	HS2	HS2.85	SHLAA16168

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H63	Hollin Farm, Waterfoot	0.18	5	28	Years 6-15	Greenfield	Housing	HS2	HS2.93	SHLAA16146
H64	Hargreaves Fold Lane, Chapel Bridge, Lumb	0.75	23	31	Years 6-15	Greenfield	Housing	HS2	HS2.100	SHLAA16149 and SHLAA16150
Whitworth, Facit and Shawforth										
H65	Albert Mill, Whitworth	1.14	49	43	Years 1-5	Brownfield	Housing	HS2	HS2.105	SHLAA16006
H66	Land North Of King Street	0.17	5	29	Years 1-5	Greenfield	Housing	HS2	HS2.102	SHLAA16019
H67	Land Behind Buxton Street	0.41	28	68	Years 1-5	Greenfield	Housing (Special needs)	HS17	HS2.103	SHLAA16021
H68	Former Spring Mill (land off eastgate and westgate)	3.7	111	30	Years 1-15	Brownfield	Housing	HS2	HS2.107	SHLAA16005
H69	Cowm water treatment works, Whitworth	0.68	20	29	Years 6-15	Mixed	Housing	HS2	HS2.108	SHLAA16016
Edenfield, Helmshore, Irwell Vale and Ewood Bridge										
H70	Irwell Vale Mill	1.43	45	31	Years 1-5	Mixed	Housing	HS2	HS2.110	SHLAA16278
H71	Land East of Market Street, Edenfield	0.31	9	29	Years 1-5	Brownfield	Housing	HS2	HS2.74	SHLAA16259
H72	Land west of Market Street, Edenfield	15.25	400	26	Years 6-15	Mixed but largely greenfield	Housing	HS3	HS2.71	SHLAA16358; SHLAA16256; SHLAA16262 and SHLAA16263
H73	Edenwood Mill, Edenfield	0.94	47	50	Years 6-15	Mixed	Housing	HS2	HS2.73	SHLAA16271 and SHLAA16270

Housing Allocation Ref.	Site name	Net developable area (ha)	No. of units proposed	Density (dwellings per hectare)	Delivery Timescale	Greenfield/Brownfield	Allocation	Policy	Reg 18 Ref.	SHLAA Ref.
H74	Grane Village, Helmshore	4	174	44	Years 6-15	Mixed but largely greenfield	Housing	HS2	HS2.78	SHLAA16304 and SHLAA16402
Mixed-use including residential										
M1	Waterside Mill, Bacup	0.09	39	433	Years 6-15	Brownfield	Mixed-use	EMP2	N/A	SHLAA16069
M2	Spinning Point, Rawtenstall	1.56	28	18	Years 1-5	Brownfield	Mixed-use	EMP2	HS2.55	SHLAA16238
M3	Isle of Man Mill, Water	0.54	16	30	Years 6-15	Mixed	Mixed-use	EMP2	HS2.97	SHLAA16397
	Total area, total number of dwellings and average density	95.11	2853	53						