



Edenfield Community Neighbourhood Forum Rossendale Local Plan Examination

30th August 2019

Matter 20 – Plan viability and monitoring

Issue - Does the Plan identify an effective monitoring framework and is development proposed in the Local Plan viable?

Questions

- a) **How will the Local Plan be monitored? Would the housing, employment, retail, leisure and environmental indicators proposed provide an effective monitoring framework? How will performance be measured? What actions would be taken if the Local Plan is not being delivered as envisaged?**

Response:

The Edenfield Community Neighbourhood Forum (ECNF) cannot ascertain how the Local Plan will be monitored, nor how performance will be measured. On a single page (page 114), the submission Plan simply lists a series of questions relating to housing, employment, retail and leisure, and 'environmental'. No further details are provided in the Council's [Strategy Topic Paper](#).

While it is clear from the evidence base that Rossendale Borough Council does monitor housing delivery (and this process encapsulates the use of employment land for residential development), it is otherwise uncertain that the monitoring of policy outcomes relating to the adopted Rossendale Core Strategy (2011) currently leads to performance measurement that in turn has been reflected in the emerging policies of the submission Plan. The [Authority Monitoring Report for 2017/18](#) provides confirmation of this approach; on page 21, it is of interest to note the comment that with housing figures below target, *'there is a need to work with key partners to ensure that significantly more new housing units are built within the urban boundary'*.

For the submission Plan to be found sound, and for it to be consistent with the National Planning Policy Framework and national Planning Practice Guidance, a very different approach to monitoring, and measuring performance, is needed. ECNF suggests that the Plan should include a monitoring framework that would provide an effective means of monitoring plan implementation and policy outcomes and that would be reported through the Authority Monitoring Report (AMR). The housing trajectory graph in Appendix 4 of the Plan should be supported by a detailed trajectory table of sites, updated during the examination, to reflect any updated information regarding (for example) lead-in times and delivery rates. This housing trajectory should be published and monitored through the AMR; a *'Rossendale Five Year Deliverable Housing Land Supply Report'* should also be published annually.

The recently adopted [Barnsley Local Plan](#) includes a detailed chapter on *'monitoring and indicators'*. Individual policies in the Plan are to be monitored against indicators/ targets, aims, and delivery/ implementation. A Table sets out Local Plan policies under separate headings for the Local Plan

objective that they are to achieve; the objectives relate to the Plan's Vision. The intention is that monitoring in this way will allow the Council to assess policy effectiveness and identify any changes required in future reviews of the Local Plan.

But as currently written, the Rossendale Local Plan cannot be monitored in this way, because it has no Vision, or set of objectives that could have been derived from one.

b) Is the Local Plan Economic Viability Assessment (2019) robust? Does it demonstrate the Local Plan is viable? Is it based on reasonable assumptions? Has the cost of the full range of expected requirements on new development been taken into account including those arising through Policies in the Plan? Does it demonstrate each of the proposed land allocations is financially viable?

Response:

ECNF is not in a position to challenge the details of the [Local Plan Viability Assessment](#) (VA, 2019). The comments below have to be placed in the wider context of the conclusion of all of ECNF's submissions in response to the MIQs relating to housing and employment – made in the context of proposed Green Belt releases - that the Plan is unsound due principally to the absence of a clear strategy and an unreliable, inaccurate evidence base on which policies are founded.

As with all such assessments, the VA provides a 'high level' overview of development types that are likely to come forward in the plan period, together with reference to the Plan's differing and contradictory policy requirements for affordable housing and s106 obligations.

One fundamental failing of the VA is that it is not consistent with national policy and the PPG with regard to it having focussed on development type and site-by-site analyses, and not having provided evidence that the total cumulative cost of all relevant policies contained in the Plan will not undermine its deliverability. Despite citing national policy and guidance, the VA has 'stopped' at the point of concluding that almost all of the residential allocations are viable; the viability of housing sites is primarily affected by their distribution within different housing sub-markets across the Borough.

ECNF would point out that for the Zone 4 land allocations – including land west of Market Street in Edenfield (in Zone 4) that was specifically tested - it was concluded that at a density of 26 homes per ha, they would '*be able to support a S106 contribution of £1,000 per dwelling and the policy compliant level of affordable housing*'. It is this £1,000 s106 contribution per dwelling that is used to test residential development viability (VA, Table 3.16: Viability Considerations for Local Plan Policies); there is no separate costing of major off-site infrastructure that may not be fundable by individual s106 contributions.

ECNF otherwise is not aware that viability has explicitly informed the site selection process for removing prospective housing and employment sites from the Green Belt. And it is noted that to date, there are no proposed policy changes that have resulted from the VA's conclusions on plan viability and delivery.

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ECNF would suggest that if they are to be retained, Policies SD3: Planning Obligations and HS2 to 6 should be revised to reflect the VA-confirmed housing site/ development viability, hence ensuring that on application, developers are aware of the payments and other obligations that will be expected of them. This would be a sensible, locally applicable interpretation of the NPPF and PPG, as regards whole plan viability testing and the limited scope subsequently for alternative assessments to be submitted on application.

Yours sincerely,

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