



# **HEARING STATEMENT – MATTER 8 APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE**

## **ROSSENDALE LOCAL PLAN EXAMINATION**

### **TAYLOR WIMPEY (UK) LTD**

Date: August 2019

Pegasus Reference: (KW/GL/MAN.0299/R010)

**Pegasus Group**

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## APPENDIX 1 – FIVE YEAR HOUSING LAND SUPPLY ANALYSIS

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## 1. INTRODUCTION

1.1 Pegasus Group have been instructed on behalf of their client, Taylor Wimpey (UK) Ltd, to prepare Hearing Statements to the Rossendale Local Plan Examination (EiP) in support of their land interests in the Borough. This relates to the following sites, which are both allocated in the submitted plan:

- Land west of Market Street, Edenfield (within Housing Allocation H72); and
- Grane Village, Helmsore (within Housing Allocation H74).

1.2 This Statement deals with Matter 8 'Approach to site allocations and Green Belt release' which addresses the following issue:

**Issue- Is the Plan's approach to identifying site allocations (housing, employment and mixed use) and Green Belt releases soundly based and in line with national policy? Do the allocation policies provide a clear and effective framework for growth?**

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**2. MATTER 8: QUESTION A – IDENTIFICATION OF SITE OPTIONS**

**[Policy HS2, Policy EMP2]**

**Site Assessment**

**a) How were potential site options identified as part of the preparation of the Plan?**

- 2.1 The Council set out the site selection process in Annex 1 of the 2019 Housing Topic Paper **(EB006)**. The report confirms how sites were identified from a number of evidence base documents, as well as the results of the SHLAA which was initially on a 'policy off' basis. Sites were then considered with regards to the Spatial Strategy and the evidence base. A staged process was undertaken in terms of the consideration of brownfield sites first, in line with national planning policy (notably paragraphs 118 and 137).

**3. MATTER 8: QUESTION B – USES OF SITES?**

**b) What uses were the sites assessed for? Was mixed-use development routinely considered?**

3.1 No comment. This is for the Council to clarify.

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#### 4. MATTER 8: QUESTION C – SITE ASSESSMENT METHODOLOGY

**c) Is the site assessment methodology robust and based on an appropriate set of criteria? How have results from the Sustainability Appraisal, Green Belt Review and other studies been factored into the site selection process?**

- 4.1 The site assessment methodology is sufficiently robust, which in turn ensures that the plan is appropriately justified based on proportionate evidence and is also effective (paragraph 35 NPPF).
- 4.2 As a starting point, it is important to take note of paragraph 23 of the NPPF, which relates to strategic policies and allocations. It states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area. It is notable that national policy does not provide guidance in terms of what can be considered as an appropriate set of criteria for site assessment, or what methodology should be followed in the site allocation process. The onus is more on the need for allocated sites to meet the overarching, strategic policies of the Local Plan and in line with the presumption in favour of sustainable development.
- 4.3 However, the PPG provides some useful guidance on what factors need to be considered when assessing the suitability, availability and achievability of a site when Council's prepare housing and economic land availability assessments. Whilst the guidance relates more specifically to SHLAAs, all three matters are key components which allow for the identification of allocated sites which help to deliver the strategic priorities of the area (as per paragraph 23 of the NPPF).
- 4.4 When discussing suitability, the PPG notes<sup>1</sup> how a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. When considering constraints, plan-makers may wish to consider matters such as the appropriateness and likely market attractiveness, and potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation. As evident in examination documents **EL1.002e(ii), (iii), (iv) and EL1.002h (ii), (iii), (iv)** (which comprise responses to the Inspectors initial questions) which show how allocated and non-allocated sites have been assessed, the Council's assessment methodology has contained all of the above, including the findings of the Council's heritage and landscape assessments.
- 4.5 Turning to assessing availability, the PPG notes<sup>2</sup> how a site can be considered available for development when there is confidence there are no legal or ownership impediments to development. This includes land controlled by a developer or landowner who has expressed an intention to develop a site. The site assessment methodology factors this matter appropriately,

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<sup>1</sup> Paragraph: 018 Reference ID: 3-018-20190722

<sup>2</sup> Paragraph: 019 Reference ID: 3-019-20190722

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with **EL1.002e(ii), (iii), (iv) and EL1.002h (ii), (iii), (iv)** containing the findings of the SHLAA which explored availability.

- 4.6 Finally, in respect of achievability, the PPG notes<sup>3</sup> how this is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. Again, the Council's evidence base documents which assesses sites contains this information, under the findings of the SHLAA category.
- 4.7 The Council's site assessment methodology also appropriately factors in the findings of the Green Belt Review and the Sustainability Appraisal (SA). It is evident that the Council's assessment methodology has outlined the objective findings of the SA, Green Belt Review, and other evidence base documents, which have then been factored into the Council's overall conclusion as to whether a site should be allocated or not. This is essentially a planning judgement which weighs up the pros and cons of a site overall, and whether it is in line with paragraph 23 of the NPPF. Namely, whether an allocated site is in line with the presumption in favour of sustainable development and can contribute towards the Council allocating sufficient sites to deliver the strategic priorities of the area.
- 4.8 Therefore, the Council's site assessment methodology is robust, contains an appropriate set of criteria and adequately factors in the SA and Green Belt Review into the final conclusions.

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3 Paragraph: 020 Reference ID: 3-020-20190722

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**5. MATTER 8: QUESTION D – REASONS FOR SITE SELECTION/ REJECTION**

**d) Are the reasons for selecting site options, and rejecting others, clearly set out and justified?**

- 5.1 At the request of the Inspector, the Council have provided an assessment overview of all accepted and rejected sites within Examination Documents: **EL1.002e (i), (ii), (iii), (iv) and EL1.002h (ii), (iii), (iv)**.
- 5.2 We do not have any particular comments on this matter, other than that the assessment criteria are consistently applied across the sites. As explained above we are supportive of the assessment criteria.



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**6. MATTER 8: QUESTION E – FLOOD RISK SEQUENTIAL TEST**

**e) Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk on potential development sites? Is this adequately evidenced? Are there any outstanding concerns from the Environment Agency?**

6.1 Taylor Wimpey do not have any comments on this matter. This is for the Council to clarify.

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**7. MATTER 8: QUESTION F – CHANGES TO ALLOCATIONS THROUGH PLAN PROCESS**

**f) Are changes made to the list of proposed allocations between Regulation 18 and Regulation 19 Plan justified and supported by appropriate evidence? Are all de-selected sites unsuitable for development or not available?**

7.1 Taylor Wimpey do not wish to comment on any de-selected sites at this time, albeit reserve the right to do so at a later date.

**8. MATTER 8: QUESTION G – NON GREEN BELT CAPACITY**

**Green Belt**

**g) Has a comprehensive assessment of capacity within built-up areas been undertaken? Have all potential options on non-Green Belt land in the countryside been assessed?**

8.1 Paragraph 137 of the revised NPPF introduces an additional test for Green Belt release matters. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local planning authorities should be able to demonstrate that they have examined fully all other reasonable options for meeting its identified need for development. This includes making as much use as possible of suitable brownfield sites.

8.2 Our accompanying **Matter 19 Statement** provides some commentary on housing capacity within the built-up area. However, it is notable that the Council fully accept that there is insufficient brownfield land within the urban area to meet the emerging housing requirements alone. Indeed, both the 2019 Housing Topic Paper (**EB006**) and Green Belt Topic Paper (**EB023**) confirm that considerable effort was put in to identifying suitable brownfield sites within built-up areas. Document **EB006** confirms the following at paragraph 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."*

8.3 Table 9 of document later confirms that the Council have still very much focused delivery within the urban boundary, but there is simply insufficient land available and therefore a necessity for Green Belt release.

**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
<b>Number of allocation sites</b>	77	52	20	5
<b>% of sites</b>	100%	68%	26%	6%

8.4 Therefore, as further explained in our accompanying Hearing Statement for Matter 19, there is insufficient land capacity within the built-up area. The Council have fully explored all options, in accordance with paragraph 137 of the NPPF.

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**9. MATTER 8: QUESTION H – NON GREEN BELT CAPACITY / DENSITIES**

**h) Have all opportunities to maximise capacity on non-Green Belt sites been taken, including increasing densities?**

- 9.1 Yes, in addition to our comments above, the Council have also appropriately considered increased densities as per the requirement of paragraph 137 of the NPPF.
- 9.2 Paragraph 4.2.8 of **EB006** confirms that the density of development on brownfield sites has been maximised as much as possible to reduce the need to allocate greenfield sites. It confirms that the average density of development on the 23 proposed brownfield site allocations is approximately 100 dwellings per hectare, which the Council already uplifted from the previous Regulation 18 consultation which had an average density of 90 dwellings per hectare.
- 9.3 Despite maximising densities on brownfield site allocations, there is still insufficient land within the urban areas to deliver emerging housing requirements. As we come onto shortly, this presents as an exceptional circumstance to alter existing Green Belt boundaries and allocate Green Belt sites.

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**10. MATTER 8: QUESTION I – CAPACITY OF NEIGHBOURING AUTHORITIES**

**i) Have discussions taken place with neighbouring authorities about whether they could accommodate some of the identified housing need?**

- 10.1 Part C of paragraph 137 of the NPPF confirms how when reviewing Green Belt boundaries, the strategy must be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- 10.2 The Council have submitted a duty to co-operate and draft statement of common ground **(SD008)**. Paragraph 44 confirms that all adjoining authorities have been asked if they could consider taking any of Rossendale’s housing requirement, or if they were expecting Rossendale to meet their housing needs. No authority has offered to meet any of Rossendale’s needs, and this applies to both housing and employment land.
- 10.3 The test to demonstrate that all other reasonable options for meeting identified development needs have been explored, as per paragraph 137 of the NPPF, has therefore been satisfied.

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## 11. MATTER 8: QUESTION J – GREEN BELT REVIEW METHODOLOGY

**J) What methodology has been applied in the Green Belt Review (2016), and is it soundly based? Does the assessment process give sufficient recognition to the strategic role that some sites play in preventing the unrestricted sprawl of Manchester (purpose 1a and 1b)? Is the framework for assessing harm, based on the existence of one 'strong' score (rather than the number of strong/medium scores), robust and appropriate?**

- 11.1 The Council will provide clarity on this matter; however, we note that the Assessment was prepared by an independent consultant (LUC) to provide as much objectivity as possible. LUC have prepared Green Belt reviews for a number of other authorities, most notably for the Greater Manchester Combined Authority (GMCA).
- 11.2 Neither the NPPF or national Planning Practice Guidance (PPG) provides guidance on how to undertake Green Belt reviews. There is therefore no set formula in terms of what methodology should be applied when undertaking a Green Belt review.
- 11.3 A recent Planning Advisory Service (PAS) Advice Note<sup>4</sup> does provide some guidance on Green Belt Reviews. This includes advice such as that in relation to purpose 5 (recycling urban land), the value of various land parcels is unlikely to be distinguishable. It also confirms that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and should not consider other planning considerations, like landscape, which should be considered in their own right. We note that the LUC methodology accords with this guidance, and the Council have not muddled this methodology, as a discrete landscape assessment document has been produced and factored into the site selection process separately.
- 11.4 Whilst there is no set formula, LUC clearly apply a consistent methodology which they have used in other local authorities, and also apply their methodology consistently when assessing all of the land parcels within the Rossendale context.

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<sup>4</sup> Planning on the Doorstep: The Big Issues – Green Belt, Peter Brett for Planning Advisory Service (February 2015).

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**12. MATTER 8: QUESTION K – GREEN BELT REVIEW INFORMING PLAN**

**k) How have the conclusions of the Green Belt Review informed the Local Plan? Have decisions on Green Belt release taken account of the need to promote sustainable patterns of development, and given priority to Green Belt sites which are previously developed and/or well served by public transport (in line with the National Planning Policy Framework)? Where is this evidenced?**

- 12.1 This is for the Council to clarify, albeit we note that their conclusions in their allocated site overview document (**EL.1.002e.ii**) refer to sustainable location and previously developed land matters. This therefore accords with the requirement outlined at paragraph 138 of the NPPF.

### 13. MATTER 8: QUESTION L – EXCEPTIONAL CIRCUMSTANCES

**I) Do exceptional circumstances exist in principle to alter Green Belt boundaries in Rossendale for housing and employment development? If so, what are they? How many hectares of allocated housing and allocated employment/mixed-use sites are proposed on current Green Belt land?**

13.1 Yes, there is a strong case for exceptional circumstances to amend Green Belt boundaries in Rossendale. As per paragraph 136 of the NPPF, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

13.2 The Council fully acknowledge that exceptional circumstances do exist, as outlined in **EB023**. Further to the Council's case for exceptional circumstances, we summarise our case below.

#### ***Housing Need***

13.3 The principal exceptional circumstance relating to the release of Green Belt land in Rossendale is directly tied to the need to accommodate the Borough's projected needs over the new plan period up to 2034, which will also require them to consider growth patterns in the adjacent GMSF area. As explained in our Hearing Statement to **Matter 3**, it is our view that the Council should be pursuing an economic growth led housing figure of at least **253 dpa**, or **3,795** over the Plan Period. However, even if the Council do pursue the currently suggested figure of 212 dwellings per annum, the Council are still unable to demonstrate a 5-year supply of deliverable sites going forward; and have consistently failed to deliver against their Core Strategy target in the past. For this very reason, the Council must apply a 20% buffer to their housing land supply (as per paragraph 73 of the NPPF), because they have fallen below the 85% housing delivery target<sup>5</sup>.

13.4 There will be significant and negative consequences if the Local Plan did not release sufficient land from the Green Belt. Namely, harm will occur from failing to meet the identified needs in the Borough; such as slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice.

#### ***Insufficient Land Supply***

13.5 Our housing land supply analysis, attached at **Appendix 1**, indicates that without the proposed allocations within the Local Plan, Rossendale could only demonstrate **1.96 years** supply at April 2018 (as per **EB010**) based on the 212 dpa figure and their existing supply.

13.6 The Council have updated their evidence for the EiP to an April 2019 base date (**EL1.002j.i**) to include proposed allocations, which gives them a supply of **6.7 - 7.4 years**; although if historic shortfall is fully accounted for this figure would drop below 5 years.

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<sup>5</sup> Government's Housing Delivery Test Results (February 2019)



- 13.7 This confirms that there is an acute 5-year housing land supply shortfall at present in Rossendale, and that this position could still be marginal when the plan is adopted, if historic under delivery is accounted for (albeit it is not currently required to under the 2019 NPPF and therefore does not directly compromise the soundness of the plan as submitted).
- 13.8 The Council acknowledge that land opportunities within the urban area are very limited and indeed have already been exhausted. Paragraph 53 of the submission Local Plan confirms this:
- "Previous developed (brownfield land) has been identified wherever possible, but the supply of sites without significant constraints within the urban boundary is limited".*
- 13.9 The major constraint in Rossendale is topography, as the Borough is characterised by a series of interlocking valleys where settlements have developed along valley floors, and therefore the majority of undeveloped land is on steep valley slopes or moorland tops. Poor ground conditions and flood risk are also significant issues. There are also significant areas of Green Belt in the south of the Borough, to separate Rossendale's settlements from the Greater Manchester conurbation, which is a further constraint.
- 13.10 Therefore, it is clear that there is not enough land within Rossendale's urban areas to meet the future development requirements of the emerging Local Plan, which necessitates the need for Green Belt release.

#### ***Affordable Housing Need and Viability***

- 13.11 The March 2019 SHMA Update (**EB002**) confirms there is a chronic lack of affordable homes within the Borough and suggests a net need of between 102-170 affordable homes per annum between 2019-2034. This presents as a significant proportion of the currently suggested overall housing requirement figure of 212 dwellings per annum. EB002 confirms that the average affordable housing completion rate between 1996/97 and 2017/18 was 43 dwellings per annum, which is clearly insufficient and will only have compounded affordability issues.
- 13.12 It is clear that the delivery of large Green Belt release sites such as Market Street, Edenfield (H72), which are viable, deliverable and available, will make a significant contribution to affordable needs within the Borough.
- 13.13 Indeed, if the Council are to meet their affordable housing requirement, viability is a key matter which must be considered. The Council acknowledge this in their Green Belt Topic Paper (EB023), where the following is stated in relation to viability (our emphasis):

*"Values for residential development in Edenfield and the south west of Rossendale where there is the largest amount of Green Belt are approximately £210 m<sup>2</sup> (2016 prices). This is the highest in the Borough....This indicates that the ability to deliver housing in Green Belt areas is likely to be very substantial as developers will be able to sell properties at a premium price. The high values achievable also mean that there is sufficient value in developments to fund affordable housing and also necessary infrastructure which may include extra school*

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*capacity...There are willing landowners involved in each of the housing sites proposed for release from the Green Belt so the dwellings proposed would be deliverable."*

13.14 The release of Green Belt land, in viable areas such as Edenfield, is therefore a crucial element of delivering emerging affordable housing requirements and constitutes as an exceptional circumstance.

13.15 On a final note, all of the above exceptional circumstances have been acknowledged by the Council and specifically listed as exceptional circumstances in relation to the H72 Edenfield allocation. Namely, in the conclusion section for the H72 allocation in **EL1.002e.ii** the following is stated:

*"The importance of having a balanced housing and employment supply in a District with challenging geography and viability issues in the east of the Borough has influenced the approach to release of Green Belt land..."*

*It is considered that this site plays an important role in contributing to a balanced housing supply in the following ways:*

- *It is located in the popular south west of the Borough where there is high demand.*
- *Given the substantial number of houses proposed in the East of the Borough the site helps to ensure a balanced supply between the east and west of the Borough*
- *The site is large enough to ensure a mix of housing types and sizes, including affordable provision in an area of the Borough where affordability ratios are highest. The site is in a viable location with willing landowners.*

13.16 Overall, it can be concluded that there is a strong case for exceptional circumstances to justify the amendments of existing Green Belt boundaries in Rossendale, and particularly for the H72 Edenfield allocation.

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**14. MATTER 8: QUESTION M – OTHER GREEN BELT BOUNDARY CHANGES**

**Are the other (non-allocation site) changes to Green Belt boundaries, as set out in document EL1.002d, justified? Have exceptional circumstances been broadly demonstrated?**

14.1 No comment.

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**15. MATTER 8: QUESTION N – POLICY SD2 - IMPACT ON OPENNESS**

**n) Is the requirement for development on Green Belt release sites to minimise the impact on openness, as set out in Policy SD2, justified and consistent with national policy?**

- 15.1 This matter is not specifically referred to in national policy and once a site is released from the Green Belt, it does not need to meet the purposes of the Green Belt (including consideration of openness matters) because it is no longer Green Belt.
- 15.2 However, we note that paragraph 133 of the NPPF confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. We therefore do not have any issues with the wording of this policy and the drive to protect the openness of the remaining Green Belt land which surrounds the Green Belt release sites.
- 15.1 We make more site specific comments on this issue in respect of Edenfield within our **Matter 8 Statement**.

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**16. MATTER 8: QUESTION O – POLICY SD2 - COMPENSATORY IMPROVEMENTS**

**o) Is the requirement for development on Green Belt release sites to contribute to compensatory improvements to land elsewhere in the Green Belt, as set out in Policies SD2, justified and deliverable? Does the policy provide sufficient guidance on the scope/form of developer contributions? Would this affect scheme viability? How would off-site improvements be co-ordinated, facilitated and delivered in Rossendale? Does the Council intend to use additional funding sources or delivery methods, and to bring forward an overall strategy?**

- 16.1 We express concerns about the deliverability of compensatory improvements to land elsewhere in the Green Belt. NPPF Paragraph 138 is clear that the onus is on strategic policy-making authorities to set out what these compensatory measures could be and not on private landowners or developers. These details are yet to be provided, therefore at this stage we object to this policy as currently worded.
- 16.2 If the Council are to provide such compensatory measures in the form of off-site contributions, this would be subject to the Council having control of third-party land, which again makes it unclear how financial contributions such as Section 106 Agreements could be used to implement such initiatives. Until this is clarified, we express concerns regarding viability, and this is a matter which must be explored in greater detail and factored into viability considerations.
- 16.3 We make more site specific comments on this issue in respect of Edenfield within our **Matter 8 Statement**.

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**17. MATTER 8: QUESTION P – SAFEGUARDED LAND**

**p) Did the Council consider whether to designate safeguarded land in the Plan? Should it be identified?**

17.1 No comment.

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**18. MATTER 8: QUESTION Q – POLICIES HS2 & EMP2 - LOCATION OF ALLOCATIONS**

**Allocation Policies**

**q) Do Policies HS2 and EMP2 provide sufficient clarity regarding the location of the proposed site allocations?**

18.1 No comment.

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**19. MATTER 8: QUESTION R – DENSITIES IN ALLOCATIONS**

**r) Are the housing density figures in Table 1 in the Plan based on the gross or net site area?**

19.1 This for the Council to clarify, albeit it is our understanding they are net site area figures.



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**20. MATTER 8: QUESTION 5 – SITE SPECIFIC REQUIREMENTS**

**s) Does the Plan provide sufficient detail on site-specific requirements, constraints and mitigation measures relating to housing, employment and mixed-use allocations in order to effectively guide development? Is it clear what developers are expected to provide and when? Why are detailed site allocation policies only provided for sites H72, H13, H5, M4 and NE4?**

- 20.1 Taylor Wimpey do not wish to comment on site-specific requirements, constraints and mitigation measures for sites other than those under their control (H72- Edenfield and H74 - Grane Village).
- 20.2 For the H72 allocation, we have previously expressed concerns regarding the requirement in Policy HS3 to provide a Design Code. We are of the view that Policy HS3 already provides sufficient detail on the mitigation and site-specific requirements required to bring the site forward, without the need for Design Code, particularly since the Council are expecting completions to begin in the year 2021/2022 (and we provide more detail within question a of our **Matter 16 Statement**).
- 20.3 Design Codes add an additional administrative burden leading to delays in housing delivery. This is particularly relevant in Rossendale, given the Council's history under-delivery, and the lack of staffing resources, and the Council will be under pressure to have this requirement secured upon adoption of the Plan. Necessitating a Design Code for the site is therefore likely to push back delivery rates.
- 20.4 If the Council are to proceed with keeping a need for a Design Code in the HS3 policy, the process should involve early engagement with Developers on Masterplan concepts. Frontloading such work will save delays later down the line and provide a high-quality design framework which both the Council and Developer are happy with. Taylor Wimpey have already undertaken such engagement with the Council on the development proposals for the H72 allocation, and an illustrative masterplan has already been submitted (See Appendices 1 and 2 of **our Matter 14 Statement**).
- 20.5 For the Edenfield allocation, we agree that some form of design framework is necessary given the size of the site, albeit it is possible this could be secured through a detailed masterplan and could be controlled through a policy in the Local Plan rather than necessitating a separate document/Design Code to be prepared and adopted by the Local Authority post adoption of the Local Plan.
- 20.6 We do not have any comments on this question in relation to the Grane Village allocation (H74).

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**21. MATTER 8: QUESTION T – POLICY HS2 - MASTERPLAN THRESHOLD**

**t) Is the proposed Masterplan threshold of 50 dwellings for housing site allocations, as set out in Policy HS2, justified and reasonable?**

- 21.1 We reiterate our concerns above in relation to the proposed Masterplan threshold of 50 dwellings. Agreeing Masterplans on every site greater than 50 dwellings will be a lengthy process and would certainly elongate timescales, again in light of the Council's limited staff resources.
- 21.2 We raise concerns that this will lead to delays in housing delivery, in the context of a Borough with historic issues of failing to meet housing delivery targets.
- 21.3 We therefore recommend that this threshold be removed, as this blanket approach is not reasonable nor justified and will likely lead to delays in housing delivery.

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**22. MATTER 8: QUESTION U – POLICY EMP2 - MASTERPLANNING**

**Are the masterplanning/development brief requirements for employment allocations, as set out in Policy EMP2, adequately defined and justified?**

- 22.1 Taylor Wimpey do not wish to comment on this matter, albeit reiterate our aforementioned concerns about delays to delivering development.

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**23. MATTER 8: QUESTION V – POLICY EMP2 - B CLASS USES**

**Are the identified B Use Classes on the employment allocations (as set out in Policy EMP2) justified and supported by robust evidence? How does the Council intend to deal with office proposals outside identified centres?**

23.1 No comment.

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**24. MATTER 8: QUESTION W – POLICY EMP2 - USE CLASSES IN MIXED USE ALLOCATIONS**

**Are the identified Use Classes on the mixed-use allocations (as set out in Policy EMP2) justified and supported by robust evidence? Should Policy EMP2 clarify the proportion of uses on each site and the amount of housing permitted?**

24.1 No comment.

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**25. MATTER 8: QUESTION X – SITE SPECIFIC VIABILITY WORK**

**What site-specific viability work has been undertaken in support of the proposed site allocations?**

- 25.1 The Council have provided a viability report **(EB019)** which assesses all of the allocated sites, including Taylor Wimpey's H72 and H74 allocations, which Savills provide a critique of at Appendix 1 of our **Matter 20 Statement**.

## APPENDIX 1 – FIVE YEAR HOUSING LAND SUPPLY ANALYSIS

### Last published position - 2018 Analysis excluding allocations

- 25.2 In March 2019, Rossendale published an updated 5-Year Supply Statement for the period 2018-2023, with a base date of 31<sup>st</sup> March 2018 (**EB010**), which gives their existing position without the inclusion of Local Plan allocations.
- 25.3 They claim a supply of **2.1 – 3.2 years** based on three requirement scenarios and their existing supply (excluding proposed allocations) with a 20% buffer, which can be summarised as follows:
- Core Strategy Annual Rate (247 dpa) = 2.1 years
  - Core Strategy Trajectory Rate (averages at 264 dpa) = 2.1 years
  - Standard Method rate (212 dpa) = 3.2 years
- 25.4 These scenarios are included in the table below (labelled 'scen 1-3'), along with some additional requirement and supply scenarios, with those in blue including the anticipated supply from allocations in the submission Local Plan, to give an indication how the position will change when the plan is adopted.

*Fig 25.1 – Pegasus Five Year Housing Land Supply (2018 base date – excluding allocations)*

	Standard Method (Council Scen 3)	Standard Method inc CS backlog	CS target (Council Scen 1)	CS trajectory (Council Scen 2)	Peg proposed minimum target (based on SHMA)
Annual Requirement	212	212	247	264	265
5 Year Requirement	1,060	1,060	1,235	1,320	1,325
Completions 2011-2018	1,206				
Requirement 2011-2018	0	1,729	1,729	1,581	1,855
Shortfall	0	523	523	375	649
5 Year Req't + Shortfall	1,060	1,583	1,758	1,695	1,974
<i>Council's method (5 Year Req't + Buffer + Shortfall)</i>	<i>1,272</i>	<i>1,795</i>	<i>2,005</i>	<i>1,959</i>	<i>2,239</i>
5 Year Req't + Shortfall + 20% Buffer	1,272	1,900	2,110	2,034	2,369
Council existing supply	824				
Peg existing Supply	745				
<i>Council method</i>	<i>3.24</i>		<i>2.05</i>	<i>2.10</i>	
Peg method Council existing supply	<b>3.24</b>	2.17	<b>1.95</b>	<b>2.03</b>	1.74
Peg method and existing supply	<b>2.93</b>	<b>1.96</b>	1.77	1.83	<b>1.57</b>

- 25.5 Within this analysis, we note the following:

- Rossendale’s Housing Delivery Test score was 75% which confirms that the 20% buffer is applicable to all scenarios.
- The Council have incorrectly added the buffer before adding the shortfall, when it should be added to the requirement and shortfall, so this has been corrected.
- The Council’s Core Strategy trajectory (Scenario 2) requirement is elevated for the next 5 years, but gives a similar overall position to Scenario 1, as the requirement was lower in the earlier years of the period, so the accumulated shortfall is less (hence the similar result in scenarios 1 and 2).
- In terms of supply, Table 6 suggests an existing 5-year supply of **824** for the period 2018-2023 with a small-sites allowance of 16 included in years 4 and 5 – which is evidenced and seems reasonable.
- This table also suggests that the Council’s total supply is just **898**, so they have capacity of just 74 dwellings beyond 2023 and will therefore be heavily reliant on allocations to meet their supply going forward.

25.6 Therefore, our analysis suggests that at 31<sup>st</sup> March 2018 supply was between **1.57 years**, based on the 265 dpa employment led housing requirement advocated in the Council’s own SHMA and our supply estimate; and **1.96 years**, based on standard method but including historic shortfall and our supply estimate.

25.7 This confirms that there is an acute 5 year housing land supply shortfall at present, before taking account of the Submitted Local Plan allocations.

#### **Current Position - 2019 Analysis including allocations**

25.8 In July 2019, the Council updated their position to support the EIP, in response to the Inspectors Initial Question 13 (**EL1.002j.i**), using an 31<sup>st</sup> March 2019 base date and including allocated sites within the supply as per their Housing trajectory.

25.9 They claim a supply of **7.4– 8.8 years** depending on whether the 20% or 5% buffers (respectively) are used, and we set out our analysis of this below using a similar approach to our 2018 analysis:



*Fig 25.2 – Pegasus Five Year Housing Land Supply (2018 base date – excluding allocations)*

	Standard Method	Standard Method inc CS backlog	Peg proposed minimum target (based on SHMA)
Annual Requirement	212	212	253
5 Year Requirement	1,060	1,060	1,325
Completions 2011-2019	1,340		
Requirement 2011-2019	0	1,976	1,976
Shortfall	0	636	636
5 Year Req't + Shortfall	1,060	1,696	1,961
5 Year Req't + Shortfall + 20% Buffer	1,272	2,035	2,353
Council existing supply	1,883		
Peg existing Supply	1,698		
Peg method w Council existing supply	<b>7.40</b>	<b>4.63</b>	4.00
Peg method and existing supply	6.67	<b>4.17</b>	<b>3.61</b>

25.10 Within this analysis, we note the following:

- HDT confirms that 20% buffer is applicable.
- The Council have not taken account of the shortfall accumulated since 2011, which they are not technically required to do under the 2019 NPPF, however this does not mean this shortfall/ unmet need goes away and as such we have included this, which generates a figure of between **4.17** and **4.63 years** (depending on whether a lapse rate is applied to the supply).
- If the OAN figure of 253 dpa is used, which is the level of housing growth required to meet the job growth aspirations of the plan, this would reduce again to **3.61 - 4 years**.

25.11 This demonstrates that even upon adoption of the plan the supply position within Rossendale is likely to be marginal if historic shortfall is accounted for.