



ROSSENDALE
BOROUGH
COUNCIL



AFFORDABLE HOUSING

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



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Introduction

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

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

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

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

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

The Forward Planning Team

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

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

Kind Regards

Lindsay

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

National Highways | [REDACTED]
[REDACTED]

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

[REDACTED]



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

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

Date: 10 October 2024
Our ref: 489039



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

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

BY EMAIL ONLY

T [REDACTED]

Dear Sir/Madam

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

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

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

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

Open Space, Playing Pitch and Indoor Sports Facilities SPD

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

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

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

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

Affordable Housing SPD

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

Should the proposal change, please consult us again.

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

Yours sincerely

Nicholas Armstrong
Sustainable Development Higher Officer



The Coal
Authority

[Redacted]

W: www.gov.uk/coalauthority

For the attention of: Forward Planning Team

Rossendale Borough Council

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

14th October 2024

Dear Forward Planning Team

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

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

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

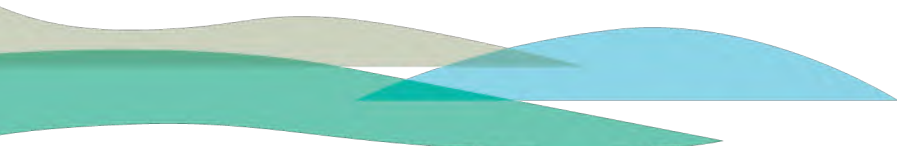
Our records indicate that within the Rossendale area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

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

Yours faithfully

[Redacted Signature]

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





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



Our ref: PL00797037

16 October 2024

Dear Sir/Madam

Rossendale Council - Affordable Housing SPD

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

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

Yours sincerely,

Emily Hrycan
Historic Environment Planning Adviser (North West)



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



HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Affordable Housing SPD Consultation

Response

Please provide your contact details:

First name and Surname

Megan
Eastwood

Address or Postcode

Futures
Park

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

-

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

I confirm that I have read and understood the privacy notice

Please select the statement that best applies to you:

Statutory Consultee

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

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

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

Yes

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

No Response

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

No Response

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

Yes

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

No Response

Q7. Do you agree with this methodology?

Yes

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

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

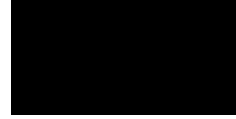
Response 2

Please provide your contact details:

First name and Surname

Olivia Birks

Address or Postcode



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

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

I confirm that I have read and understood the privacy notice

Please select the statement that best applies to you:

Statutory Consultee

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

N/A

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

Comment:
N/A

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

N/A

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

N/A

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

Comment:
N/A

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

N/A

Q7. Do you agree with this methodology?

Comment:
N/A

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

5.12 Specialist Housing/Older Persons Housing

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

H19 – Former Bacup Health Centre

H48 – Former Waterfoot Primary School

H61 – Land behind Buxton Street, Whitworth

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

6.3 Vacant Building Credit

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

Vacant Building Credit should then be applied which is equivalent to the gross amount of floorspace brought back into use or created via a new building.

6.3.3 For example:

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

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

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

Good day.

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

Regards

Ian Francis

[REDACTED]

[REDACTED]

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Sent with GMX Mail app

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

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

22nd October 2024

BY EMAIL ONLY

RE: Consultation on Rossendale Draft Affordable Housing Supplementary Planning Document

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

NHS Property Services

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

Draft Affordable Housing Supplementary Planning Document

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

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

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

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

Conclusion

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

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

Yours faithfully,

Daniel Fleet
Town Planner

E: [REDACTED]

For and on behalf of NHS Property Services Ltd

Responses received after the consultation concluded

Emailed to: forwardplanning@rossendalebc.gov.uk

22nd October 2024

www.cprelancashire.org.uk

Dear Rossendale Planning Department

Group President

Nick Thompson

Group Chair

AFFORDABLE HOUSING SPD CONSULTATION

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

(1) Local Democracy and Community Engagement

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

(2) Affordable Housing and Developer Contributions

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

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

(3) Climate and Sustainable Development

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

(4) Biodiversity and Nature's Recovery

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

(5) Beauty and Heritage

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

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

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

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

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

Yours sincerely



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