

Planning Policy  
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SENT BY EMAIL

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15/06/2021

Dear Forward Planning Team,

### **ROSSENDALE LOCAL PLAN: ADDITIONAL EVIDENCE**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Additional Evidence produced as part of the Examination into the Rossendale Local Plan.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

### **Housing Update (May 2021)**

3. The Housing Update has been prepared to address the housing requirement figure in light of the fact that more than two years has passed since the Local Plan had been submitted. As the PPG<sup>1</sup> states that the local housing need calculated using the standard method may be relied upon for a period of 2 years from the time a plan is submitted to the Planning Inspectorate for examination.
4. The Council have calculated the LHN using the standard method as 185 dwellings per annum (dpa). The Council does not consider that there are any circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Therefore, the Council considers that the revised LHN is appropriate and provides a sustainable and achievable housing growth figure for the Borough.
5. The Council do, however, note that it may be appropriate for the Inspectors to consider extending the Plan period from 2034 to 2036 to ensure that there is 15-year period from the date of adoption.
6. The HBF considers that it is appropriate for the Council to update the LHN calculation as set out by the PPG. The HBF considers that the Council have undertaken the calculation

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<sup>1</sup> ID: 2a-008-20190220



following the standard method and that the 185dpa is the correct figure. The HBF is however, concerned that the Council has not included an uplift to address the affordable housing need or in relation to the evidence provided by Lichfield's in their ELR/SHMA Analysis (April 2021).

7. The 2019 SHMA identified an affordable housing need of between 102 and 170dpa, the HBF is concerned that the currently proposed housing requirement of 185dpa will not address this housing need and will lead to an increase in housing need in the Borough. PPG states that *'an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'*. Therefore, the HBF recommends that the Council look to increase their housing requirement to ensure that this affordable housing need can be addressed.
8. The Lichfield's ELR/SHMA Analysis (April 2021) report considers the 2018 Experian job growth projections using PopGroup. The jobs growth is identified as 1,400 jobs and using this a housing need of 242dpa is identified, which rises to 268dpa where a partial catch up in relation to headship rates is included. The HBF are concerned that this is another element of evidence that has not been considered appropriately by the Council, and that highlights the potential need for an increase in the housing requirement to ensure an appropriate balance between employment and housing.
9. In conclusion, the HBF considers that the housing requirement should be increased from the 185dpa identified by the standard method, to contribute to meeting the affordable housing need and to ensure an appropriate balance between employment and housing.
10. The HBF considers that it would be appropriate to extend the plan period to ensure that the Plan will cover a 15-year period from adoption.

### **Future Engagement**

11. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
12. The HBF would like to participate at any further examination of this local plan, to ensure we are able to debate the comments made within our representation in greater detail as required and to ensure we are able to respond to any additional evidence provided by the Council or others following submission of the plan.

Yours sincerely,



**Joanne Harding**

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