

Planning Policy  
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14/10/2021

Dear Planning Policy Team,

### **ROSSENDALE LOCAL PLAN: MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Rossendale Local Plan Main Modifications consultation.
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.

#### **MM06: Policy HS1**

3. This policy is to be amended to extend the Plan period to 2036 and to increase the overall housing requirement to 3,191 dwellings. However, this is a reduction in the annual housing requirement from 212 dwellings per annum (dpa) to 208dpa for the period 2019/20 to 2020/21 and 185dpa for the period 2021/22 to 2035/36.
4. The HBF considers that it is appropriate to extend the plan period to 2036 to ensure that the strategic policies look ahead over a minimum 15-year period from the adoption of the plan.
5. The HBF does not consider that the proposed housing requirement is sound. The annual requirement of 208dpa followed by 185dpa is not considered to be sound. This is not considered to be consistent with national policy which looks to support the Government's objective of significantly boosting the supply of homes. The HBF is also concerned that this figure will not address the local affordable housing need and will not create an appropriate balance between economic development and housing.

#### **MM013: Policy HS3**

6. The Council propose to amend this policy to refer to sites of 0.5ha, the HBF considers that this amendment is appropriate and is line with national policy.
7. The Council also proposes to amend the policy to refer to the 10% affordable home ownership product. The HBF considers that the Council are right to make this change to



make sure that it is clear that the 10% refers to the overall housing number and not as a proportion of the affordable housing requirement.

**MM014: Policy HS4**

8. The Council are proposing to amend this policy to include reference to densities of at least 40 dwellings per hectare within town and districts centres. The HBF considers that the Council should amend this policy further to ensure that it is appropriately flexible.

**MM015: Policy HS5**

9. The Council proposes to amend this policy to apply to only developments of five or more dwellings. The HBF considers that this is an improvement on the previous policy.
10. The Council also proposes to include reference to Optional Standard M4(2) whilst the HBF still has some concerns in relation to the evidence to support this requirement and the viability of the requirement the HBF considers that the clarity of the policy has been improved.

**MM025: Policy HS16**

11. The Council proposes to amend this policy in relation to self-build and custom-built houses to state that the policy will be subject to the Council's self-build register and site viability. The HBF continues to consider that the Council's approach is restrictive rather than permissive by encouraging the inclusion of such housing on sites of 50 or more dwellings and does not consider that it is in line with Government objectives to boost housing supply. However, if the policy is to be retained the HBF considers that the inclusion of reference to the self-build register and the viability of the site are useful inclusions.

**MM043: Policy ENV4**

12. The Council are proposing to amend this policy to delete reference to 'with a net gain for biodiversity demonstrated' and this instead has been replaced to 'all development proposals should seek to protect and enhance biodiversity, and will be requested to quantify any net gains'. They are also proposing to delete the reference to the provision of SANGS. The HBF generally considers that these are improvements to the policy.

**MM045: Policy ENV6**

13. The Council proposes to amend this policy to delete the requirement for electric vehicle charging points on all new housing developments. This is to avoid duplication with Policy TR4. The HBF considers that this deletion is appropriate.

**MM053: Policy TR4**

14. The Council proposes to amend this policy to seek the incorporation of EV Charging Points, it looks for residential developments to include one charger per new house and one charger for every five apartments. The policy also states that exceptions will only be considered if it can be demonstrated that they are not technically feasible or they are prohibitively expensive. The HBF continues to consider that this policy would benefit from further flexibility and should be clear that it will only apply on a per house basis where off-street parking is being provided for the dwelling. However, given Government's

consultation on including EV Charging points as part of Building Regulations, it is possible that this policy will be superseded with a nationally defined standard.

### **Future Engagement**

15. 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.
  
16. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harding', written in a cursive style.

**Joanne Harding**  
**Planning Manager – Local Plan (North)**  
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