

Housing Delivery Test Action Plan

Local Authority: Rossendale Borough Council

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Contents

1. Introduction	1
Background	2
2. HDT results for Rossendale (2019)	3
3. Relationship to other plans/strategies and council activities	4
4. Current Local Plan status and housing requirement	5
Adopted Plan	5
Emerging Local Plan and new housing requirement	5
5. General Housing Delivery Issues	6
Development costs, values and viability	6
Infrastructure planning, funding and delivery	6
Economic Development	6
Council-owned land	6
Strategic Housing	7
Accelerated Construction	7
6. Housing under-delivery: root-cause analysis	8
7. Key Actions & Responses	11
8. Project management and monitoring arrangements	17

1. Introduction

1.1 The purpose of this Housing Action Plan (HAP) is to demonstrate the measures Rossendale Borough Council (RBC) are taking in boosting housing delivery and to provide an analysis of some of the potential reasons for not fully delivering the Borough's identified housing requirement.

1.2 RBC recognise that delivering housing growth is complex. Whilst a number of the actions identified in the HAP are within the remit of the Council, it is recognised that, to successfully respond to the challenge of increasing and maintaining housing delivery, the Council will also need the support and co-operation of others who are involved in delivering homes. Therefore the HAP is intended to be a useful tool for developers, house builders, investors and landowners, Council Members and for other parties with an interest in contributing to the actions identified.

1.3 This is the first HAP the Council has produced and it is intended that its main purpose at this stage is to identify key issues, highlight what is already being done and offer potential solutions, rather than provide a detailed action plan with specific timelines. The Council's emerging Local Plan (2019-34) is currently at Examination stage and much of the evidence prepared for the Local Plan, as well as information provided as part of the pre-hearing process, will be highly relevant to this HAP. Where appropriate, links to separate documents will be provided, rather than reproducing them in this HAP. The next HAP will be able to provide a greater level of detail once the Local Plan is adopted. This will include further information on the five year and overall housing land supply as well as the spatial distribution of housing growth throughout the Borough.

Background

1.4 The Government is committed to the improved delivery of more new homes nationally through their economic and housing growth agendas. To this end, they have introduced a number of measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local planning authorities (LPAs) have been tasked with being more proactive in increasing the speed and quantity of housing supply to meet the identified housing needs of their local area.

1.5 Part of this agenda has been the introduction of the Housing Delivery Test (HDT) which has been developed by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures net additional dwellings provided in a local authority area against the homes required (over the previous three years). For the purposes of the HDT, the housing requirement is taken as the lower of either: the latest adopted housing requirement or the minimum annual local housing need (LHN) figure (generated using the Government's Standard Methodology). Where the adopted housing requirement is more than five years old, the minimum annual local housing need figure will apply.

1.6 The methodology for calculating the HDT measurement is set out in the HDT Measurement Rule Book, and the Ministry of Housing, Communities and Local Government (MHCLG) will publish the HDT result for each local planning authority in England on an annual basis. The consequences of failing the HDT are set out in the revised National Planning Policy Framework (NPPF). These consequences will apply until subsequent HDT results demonstrate that delivery exceeds the required rate in the following year. Should delivery exceed 95%, no consequences will apply. Where a new housing requirement is adopted, the HDT calculation will be run using these new targets and any consequences for under-delivery will be applied.

1.7 The first set of results were published in February 2019, based on delivery between 2015/16 to 2017/18 and these were followed a year later with the 2018/19 results. The Government has been late in publishing these initial results but thereafter the intention is that they will be produced every November. The HDT is used to determine the buffer to apply in housing supply assessments and whether the presumption in favour of sustainable development should apply. Under the HDT:

- Where housing delivery over the previous three years has been less than 95% of the housing requirement, Local Planning Authorities (LPAs) should prepare an action plan setting out the causes of under delivery and the intended actions to increase delivery;
- Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment;
- Where delivery has been less than 75% of the housing requirement, the NPPF's presumption in favour of sustainable development will apply¹.

¹ A three year transitional period will operate from November 2018. In 2018 the threshold will be delivery below 25% of the housing required over the previous three years, rising in 2019 to 45% and then 75% in 2020. For further information see Annex 1 of NPPF: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

2. HDT results for Rossendale (2019)

2.1 As the adopted housing requirement in Rossendale (based on the Core Strategy adopted in 2011) was more than five years old at the time the results were published, the HDT has been assessed against the minimum local housing need figure from the three previous test years. Against the 2019 HDT results, RBC's average delivery rate for the years 2016/17 to 2018/19 was 77% and, as such, RBC is required to produce an Action Plan. A full breakdown of the results for Rossendale can be seen in Table 1 below:

Table 1: Housing Delivery Test Results 2019 for Rossendale Borough Council

Number of homes required			Total homes required	Number of homes delivered			Total homes delivered	HDT : 2019 measurement	HDT : 2019 consequence
2016/17	2017/18	2018/19	2016/17 to 2018/19	2016/17	2017/18	2018/19	2016/17 to 2018/19		
217	185	208	610	195	149	123	466 ²	77%	Action Plan and Buffer

2.2 Furthermore, as the HDT measurement shows that delivery was less than 85%, the Council is required to apply a 20% buffer to the supply of deliverable sites. In practice, this is applied to the five year housing land supply so the buffer equates to the provision of an additional one years' supply of land. The Council must therefore demonstrate that it has sufficient deliverable land to accommodate six years' worth of housing (as measured against the annual housing requirement). More information on this can be found in the [Five Year Housing Land Supply report](#), which is produced annually.

2.3 The Council recognise that, regardless of the HDT result, the continued monitoring of potential barriers to housing growth and the identification of practical measures to address this are hugely important. The Council therefore consider the production of a housing delivery plan to be a matter of good practice, even once housing delivery is back on track.

² This is the figure shown in the published HDT results as some of the previous years' housing figures were rounded up or down

3. Relationship to other plans/strategies and council activities

3.1 The Action Plan complements existing Council plans, policies and strategies which provide a framework for the delivery of the council's housing priorities. The following section provides a brief overview of relevant objectives from other plans and strategies produced by or involving RBC:

Rossendale Borough Council Corporate Plan 2017-2021

- Reduce the number of empty dwellings across the Borough
- Increase the standard and availability of affordable housing, making sure our residents have decent housing they can afford and enjoy living in

Rossendale Borough Council's Corporate Strategy 2017-21 Refresh

A light refresh of the Corporate Strategy's objectives was undertaken in 2018. The refreshed Strategy includes three overarching priorities, with the third of these 'a proud, healthy and vibrant Rossendale' having objectives which most directly relate to housing delivery. These objectives aim to:

- Protect our more vulnerable residents by working to prevent and relieve homelessness, and providing adaptations to assist people to live independently in their own homes;
- Meet the housing needs of the borough by increasing the delivery of affordable homes and reducing the number of empty dwellings across the Borough.

Economic Development Strategy for Rossendale 2018-2033

Relevant objectives from this Strategy include the intention to:

- Investigate establishing a local authority-led housing company to deliver affordable housing and address local housing need across tenures;
- Develop a Vacant Property Plan;
- Investigate commencing the Compulsory Purchase Order (CPO) of Waterside Mill, Bacup and other targeted development opportunities.

The Prevention of Homelessness Strategy and Review 2018-21

The most relevant priority within the Strategy for the Housing Action Plan is "Priority 3: *Ensure that housing supply best meets housing need*". This involves working with Private Registered Providers (PRPs) regarding the allocation of existing stock, as well as the facilitation and the determination of new social housing which reflects the needs of the borough, including bespoke solutions where necessary.

Pennine Lancashire Housing Strategy 2009-2029 (PLHS)

This Strategy outlines the key housing issues the area is facing and identifies and responds to the housing threats and opportunities in the context of the key factors that affect the housing market. It reflects the challenges faced by housing authorities and other stakeholders, highlighting the approaches that are being developed to address specific housing issues. It serves to set out a long term direction whilst providing a strong initial strategic framework for the relationship between market intervention, renewal and growth that will improve the ability of Pennine Lancashire's housing market to respond to both its social and economic opportunities. This strategy will sit above the strategies and action plans of the individual housing authorities.

4. Current Local Plan status and housing requirement

Adopted Plan

4.1 The current adopted Local Plan for the Borough is the [2011 Core Strategy](#). This forms Part 1 and contains a development strategy, including Area Visions and Development Management policies. The Core Strategy's housing target was based on the then Regional Spatial Strategy (RSS) housing requirement of 247 dwellings per annum. After the Core Strategy was adopted, work was begun on Part 2 of the Plan, which involved the preparation of an initial (Regulation 18) draft of a Site Allocations and Policies Plan to identify sites to meet the Core Strategy's development requirements. However, after the adoption of the Core Strategy, the RSS was revoked and it was decided that Part 2 should be withdrawn in favour of undertaking a comprehensive review of the whole Local Plan. This was in recognition of the need to review the housing and employment land targets in the Core Strategy and Rossendale's updated development requirements.

Emerging Local Plan and new housing requirement

4.2 The Rossendale Local Plan (2019-34) was submitted to the Planning Inspectorate in March 2019 and the Examination Hearings took place at the end of September 2019. This followed two rounds of public consultation at Regulation 18 (consulted on between July and October 2017) and Regulation 19 (August to October 2018) stages. More information can be found here:

<https://www.rossendale.gov.uk/localplan>

4.3 The Local Plan seeks to promote sustainable housing and employment growth while protecting the special valley and moorland setting of the Borough. The Plan will provide the statutory planning framework for the Borough and be used to guide decisions on planning applications and areas where investment should be prioritised. Once adopted, it will replace the Core Strategy 2011. As the Core Strategy is more than five years old, the housing requirement of 247 dwellings pa within it is now considered to be in need of review.

4.4 The emerging Local Plan has a housing requirement of 212 dwellings per year or a total of 3,180 dwellings over the 15 year Plan period covered by the Plan (2019-2034). As the requirement set out in the new Local Plan has not yet been adopted, the HDT will continue to use the Local Housing Need generated by the application of the Standard Method at the time of the results being produced.

5. General Housing Delivery Issues

Development costs, values and viability

5.1 The Local Plan recognises that development in Rossendale is constrained by the topography of the area. This means that the supply of flat, available land is limited and there are also other physical constraints, notably flood risk. The plan also notes that Brownfield sites, where available, often have issues that require resolution before the site can come forward for development. As a result large, easy to develop sites are in short supply. Green Belt also covers over 20% of the Borough while there are also extensive areas of Moorland, some within the buffer zone of the South Pennines Special Protection Area (SPA) and/or designated as Sites of Special Scientific Interest (SSSI).

5.2 A [Viability Assessment](#) was carried out in 2019 to inform the emerging Local Plan and provides some general observations about the financial viability of housing development. Viability assessment in planning is concerned with whether the value generated by a development is more than the cost of the developing it. The 2019 Assessment states that viability and hence the level of planning obligations (financial contributions that developers are expected to provide) that can be supported varies across the Borough. The results suggest that development on brownfield sites in the lowest value zone (identified as Bacup and Stacksteads) have the most significant viability issues (although greenfield sites in the area fare better) and this could be exacerbated if additional financial contributions are required. Development in the highest value zone (identified as Helmshore, Edenfield, parts of West Rawtenstall and Haslingden) is generally seen as the most viable and where a higher level of developer contributions can be supported.

5.3 Viability clearly has an effect on housing delivery although it is also recognised that development can and does take place even in those zones shown as being unviable.

Infrastructure planning, funding and delivery

5.4 The emerging Local Plan allocates a large amount of land for new housing and employment development. It is supported by an [Infrastructure Delivery Plan](#) (IDP) and associated policies setting out how new infrastructure associated with new development is to be delivered.

5.5 The IDP concludes that, in relation to infrastructure provision, the Local Plan is expected to be able to realistically deliver its housing targets within the early phases of the plan without large scale investment but action must be taken now to address any funding gaps for delivery in later stages. Securing money for strategic level infrastructure will require the Council to work with Lancashire County Council (LCC) and other partners to develop a more detailed intervention programme to use as a basis for funding bids.

Economic Development

5.6 The Council is currently working on the Bacup and Haslingden 2040 Visions and masterplans. These include plans to contract the core retail offer in these areas and repurpose vacant and derelict buildings into new uses, which will include new residential uses in the town centres, as well as leisure, community or overnight accommodation uses.

Council-owned land

5.7 In relation to the disposal of council assets, it is recognised that more needs to be done to identify and promote council owned land for prospective development. Currently most land being released is small scale and is often only attractive to those seeking to extend existing gardens. However, these sites could also provide opportunities for self-build within the

Borough and more could be done to encourage this, for example through more active promotion of the Council's Custom and Self-build Register.

5.8 There is also a need to maximise the potential for “re-purposing” council-owned town centre sites and buildings for housing (see above). There have already been some positive examples of conversion of previously commercial uses to residential in Rawtenstall. There is also a recognition of the need to encourage change of use to residential in other areas as a means of ensuring continued viable use, such as Lower Deardengate, Haslingden which is no longer considered to be attractive to commercial users.

Strategic Housing

5.9 The following provides a brief commentary on current strategic housing priorities for the Council. These largely focus on affordable and social housing issues:

Supported Housing

5.10 Although need is increasing for Supported Housing, funding for this has been significantly cut in recent years and is currently not regarded as a growth area. Aside from offering guidance and support to The Council is approached in relation to the provision of supported housing, it is able to provide useful contacts and data but is not able to help with the building or acquisition of stock. However, the Council recognise that this type of housing does not necessarily need to be purpose built, as it is more about the support provided rather than the actual housing stock. It is increasingly likely that care groups and general needs housing with no support will fill the gap in provision.

General housing needs

5.11 From the Council's strategic housing perspective, it is considered that there is a lack of 3 bedroom+ social housing, particularly in the west of the Borough and a lack of smaller properties suitable for single people under 35 who may struggle to afford market rents. The suitability and location of existing older people's housing is also an issue, for example, bungalows which are located on steep roads or in flood-risk areas.

Social housing providers

5.12 An issue has been identified in relation to the number and diversity of providers, with around 84% of social housing stock in the Borough being under the control of a single provider. This monopoly of provision may cause problems for past tenants wishing to be rehoused. The development of new forms of social housing and working with a wider range of Private Registered Providers (PRPs) would help to mitigate these problems.

Accelerated Construction

5.13 The Accelerated Construction programme is a Government initiative designed to help local authorities make the best use of surplus public sector land, providing support and funding to those who wish to bring such land forward for housing development. This includes help with site preparation and construction costs. The approach is seen to offer a number of advantages which helps to speed up the rate at which at which homes are delivered.

5.14 The Council is currently working with Homes England to assess the suitability of land in the Council's ownership for inclusion within the programme.

6. Housing under-delivery: root-cause analysis

6.1 The following section provides a summary of specific key issues that have emerged in relation to housing delivery, using policy monitoring data, evidence prepared for the emerging Local Plan and following discussions with the Council's Housing Action Plan working group. This comprises of officers from Forward Planning, Development Management, Strategic Housing and Economic Development. Further detail on potential causes and solutions are set out in section 7.

Local Plan Position / Housing Land Supply

6.2 The Core Strategy was adopted in November 2011 and contains a housing requirement of 247 dwellings per year. As the adopted Plan is over five years old, the housing requirement within it (and associated housing policy) are now considered out of date in relation to future housing delivery assessment. The proposed site allocation document (Part 2 of the Core Strategy) did not proceed as anticipated and therefore there are no up to date housing allocations currently identified in an adopted Plan.

6.3 In recent years, the Council has not been able to demonstrate a five year housing land supply (5YHLS). This effectively renders any housing policy in a Plan out of date and means the NPPF's "presumption in favour of sustainable development" will come into effect.

6.4 In essence, the presumption means that any development which accords with an up to date development plan should be approved without delay. Development should also be approved if relevant policies are absent or out of date (as the housing policies would be if there is no 5YHLS). This is unless it can be demonstrated that the impact of the development would significantly outweigh the benefits, when assessed against the NPPF or where the NPPF indicates that this type of development should be restricted. In practice, this means that development could be approved on less preferable sites.

6.5 Whilst in theory the presumption in favour of sustainable development increases the opportunities for sites to come forward, i.e. development is less constrained by location / policy restrictions, it can also create uncertainty. The ideal situation for both local communities and developers is to be able to plan effectively for growth and identify future sites in the most appropriate locations, where development has been anticipated, rather than allow development on an ad hoc basis.

6.6 The emerging Local Plan is at Examination stage. This contains a number of housing allocations and a suite of up to date policies including policies seeking to make the most efficient use of land by ensuring densities are increased where appropriate. Once adopted, the Local Plan (and other identified sources of housing land) should provide sufficient land to meet housing targets over the Plan period of 2019 to 2034.

6.7 It could be argued that, in future, the amount of housing land available will not be a barrier to housing delivery as there will be a supply of a variety of sites in a number of locations. However, it is acknowledged that the Council must continue to work proactively with landowners, developers and housebuilders to bring sites forward for development and improve infrastructure, as well as explore ways of maximising the potential of the Council's own land portfolio.

Location of Housing Development

6.8 In recent years, the majority of larger applications for housing have been located within countryside locations adjacent to the urban boundary. This is due to the lack of, or difficulties with, suitable sites within the urban boundary. The granting of planning permissions in these

locations is largely reliant on the fact that the Council does not currently have a five year housing land supply or up to date development allocations.

6.9 In relation to the viability of housing development, there is a perception that the west of the borough is most attractive to developers but planning application data shows that a number of large schemes have in fact come forward in the east, albeit with the recognition that viability remains a concern in this area. In practice, there can be some disparity between the Council's view on viability and the viability assessments carried out by applicants.

Development Management

6.10 The Council's Development Management service considers applications for a variety of development proposals, such as major housing, employment and regeneration schemes, changes of use of land and buildings, householder applications, works to listed buildings, planning appeals and enforcement. According to the latest Authority Monitoring Report (AMR), the Council dealt with 780 planning applications in 2017/18 for a whole range of different types of development and planning consents. Pre-Application enquiry applications amounted for nearly 11% of all applications received.

6.11 Of these, nearly 90 applications were received for new dwellings in 2017/18, ranging from individual houses to major schemes. Emerging data from 2018/19 suggests that around 255 dwellings were granted full or outline permission in this financial year (with a further 100 dwellings on a site where this is a resolution to grant planning permission).

6.12 The authority has approved a relatively large amount of housing in recent years (especially in proportion to the size of the Borough) and therefore the granting of permission is not identified as a significant barrier to housing delivery. However, it is acknowledged that there may be issues in relation to the time taken to validate applications, in the determination of applications and in the implementation of permissions i.e. the time taken to commence development once permission has been granted.

6.13 Whilst it is not seen as a major cause of delay, an issue has been identified with the validation process where it may be necessary to return to applicants more than once in order to make an application valid. Applicants may provide incorrect or incomplete information in the first instance and the application is not validated as quickly as it could be.

6.14 [Planning performance statistics](#) from April 2017 to March 2019 indicate that the Council has a very good track record in determining applications within agreed time limits, with over 94% of major applications and over 96% of non-major applications being determined within these limits. However, it is acknowledged that, whilst applications rarely go out of time, it may be that time extensions have been negotiated on some major applications and that the actual time taken to determine applications can be lengthy. Reasons for this are considered to include:

- lack of take-up of the pre-application service, where potential constraints and issues can be identified and addressed early in the process – avoiding delays once an application has been submitted;
- failure to respond to pre-application advice even when this has been sought;
- lack of information and delays in providing information when requested;
- delays in agreeing legal agreements;
- lengthy consideration of viability;
- lack of use of Planning Performance Agreements;
- staff resources.

6.15 Another particular issue relates to pre-commencement conditions attached to some approvals. This may include, for example, conditions on sites where contamination has been identified as a potential risk and which require the monitoring of contamination levels over a

period of time before any development is allowed to take place. It has been found that such conditions tend to be routinely imposed whether necessarily taking account of individual circumstances and the level of monitoring required is therefore often disproportionate to the scale of development. This can lead to lengthy delays in commencement on sites which would otherwise be relatively straightforward to develop.

6.16 This is seen as a particular issue in Rossendale as other Lancashire authorities use a different consultation process. It also has a particular effect here as many housing schemes in the Borough are classed as minor development (i.e. under ten homes). For major development, consultation with the Environment Agency (EA) is carried out which, although this may generate a similar condition, they tend to be easier to discharge and cause fewer delays. As EA will not comment on minor development, the issue remains for smaller schemes.

6.17 The negotiation of section 106 agreements can also cause delays. For example, Heads of Terms should be available before applications are determined but, in practice, these are sometimes drawn up after permission has been granted due to uncertainty about the eventual outcome i.e. the legal section wish to avoid spending a lot of time preparing detailed agreements before permission has been granted, just in case it is refused.

Past delivery of affordable housing

6.18 Affordable dwellings do not require to be marketed and sold in the same way as open market properties so they are often viewed as a faster and less risky way of delivering housing, especially where a reliable funding source is available. In recent years, however, there has been a reduction in affordable housing delivery. Whilst it is no longer considered that these will create a significant barrier in future, the following commentary from the Council's Strategic Housing section provides a helpful explanation of how issues with affordable housing provision have affected overall housing delivery:

- The 1% a year rent reduction between 2016-2020: this has affected both grant-funded sites and those with section 106 agreements (developer contributions) in place for affordable housing. As well as Registered Providers (RPs) losing income due to this, the uncertainty surrounding future rent levels meant detailed site viability appraisals were unable to be carried out. Since 2017, it has been known that post-2020 rents will increase but it will take two to three years for the impact of this to take effect. This may affect the projected viability of grant funded units which are currently in the pipeline.
- The Affordable Housing Programme for England initially excluded rented tenures and focused on shared ownership properties. However, this was undersubscribed as there tends to be less demand for Shared Ownership in Rossendale and this can create greater risk for RPs who need to sell them. There is typically a dip in affordable housing delivery at the end of every grant funding cycle, and the policy to concentrate on Shared Ownership at the start of a new cycle is likely to have set RPs back 12-18 months. There has now been a change in national policy
- Starter Homes – the starter home policy was first introduced in 2014 and the Housing and Planning Act 2016 provides the statutory framework for this type of housing³. At the time, Starter Homes were intended to be one of the main drivers for housing delivery and developers were keen on the concept as it meant they would not need to provide the same level of discount as would be required for traditional affordable homes. The delay in publishing associated legislation affected housing delivery as developers were holding off until the Act came into effect before they committed to

³ The Act defines starter homes as new homes costing up to £250,000 (£450,000 in London), to be available at a minimum 20% discount on market value to eligible first-time buyers.

providing affordable housing on any proposed schemes. However, little further guidance has emerged since from the Government and these are not currently considered to offer a significant contribution to housing delivery in this area.

7. Key Actions & Responses

7.1 Table 2 below summarises the potential barriers to housing delivery, notes actions which are already being taken by the Council and presents a range of possible solutions and future actions.

Table 2: Housing Delivery - Summary of Causes of Under-delivery and Key Actions

Issue	Possible causes of under-delivery	What is currently being done	Key Actions / Responses
Lack of housing land supply, including Five Year Housing Land Supply (5YHLS)	<ul style="list-style-type: none"> • Out of date or no Local Plan housing allocations; • Out of date housing policies; • Potential sites not being identified or promoted; • Failure to engage with / lack of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees); • Detailed data needed on individual site performance as well as usual trajectory etc., improvements to data needed; • Over-optimistic housing trajectory 	<ul style="list-style-type: none"> • Local Plan review – Local Plan at Examination in Sept/Oct 2019 – this allocates land for over 2,800 new homes and includes up to date policies relating to housing and developer contributions; • All sites have been assessed for their deliverability through the Strategic Housing Land Availability Assessment (SHLAA); • The Plan recognises the current shortfall in suitable land within the urban boundary / countryside and the need for strategic Green Belt release to provide necessary additional sites– this has helped to significantly increase the housing land supply; • A self-build register is maintained and published and a register of all suitable brownfield sites is updated annually, in line with Government requirements; • Accelerated Construction programme 	<ul style="list-style-type: none"> • Adopt Local Plan once been through Examination with 2,853 potential new homes allocated • Increase use of Developer forum events • Greater promotion / use of Self and custom build register • Greater promotion / use of Brownfield Register; • Increase engagement with Stakeholders to identify more land and encourage the increase of pace of delivery; • Improve evidence base relating to deliverability, e.g. engaging regularly with key stakeholders to obtain up-to-date information on build-out of current sites, identify any barriers, and discuss how these can be addressed. • Greater engagement with landowners / developers to demonstrate that sites are effective and deliverable; • More stakeholder engagement in developing housing trajectory – spread of site sizes; • Regularly revise and update the Strategic Housing Land Availability Assessment (SHLAA) • Considering compulsory purchase powers to unlock suitable housing sites; • Continue place marketing & promotion to actively promote the area/specific areas to stimulate market interest • Make greater use of self and custom build and Brownfield Registers as a promotional tool to stimulate development • Explore Permission in Principle • Working with LCC and other agencies to improve infrastructure e.g. highways improvements, education capacity
Large proportion of housing growth concentrated in relatively few sites	<ul style="list-style-type: none"> • Risk that if one or two large scale sites do not come forward, this will have a significant effect on overall delivery 	<ul style="list-style-type: none"> • Working with landowners / developers of key allocations inc. H72 in Edenfield; • Promotion of masterplanning approach on large sites over 50 to ensure potential issues are 	<ul style="list-style-type: none"> • Continue to work with landowners / developers through planning application process • Implementation of masterplanning requirements in Policy HS2

Issue	Possible causes of under-delivery	What is currently being done	Key Actions / Responses
		<p>identified and addressed upfront in a co-ordinated manner</p> <ul style="list-style-type: none"> • Allocation of a range of site sizes in Local Plan 	
Land ownership	<ul style="list-style-type: none"> • Unmotivated owners / lack of willingness to release land • Complexity of land ownerships and 'ransom' situations 	<ul style="list-style-type: none"> • Call for Sites process for Local Plan; • Landowners and developers have been invited to submit land for consideration and have been contacted to provide further information on development intentions; 	<ul style="list-style-type: none"> • Consider on-going Call for Sites process • Increase use of Developer forum events • Greater engagement with landowners / developers to demonstrate that sites are effective and deliverable including regular contact re. future intentions
External factors	<ul style="list-style-type: none"> • Lack of Strategic infrastructure funding • Weak housing demand • Development viability 	<ul style="list-style-type: none"> • An independent viability consultant has been engaged to assist the Council and viability training is scheduled to take place in August 2019 • The Local Plan has a balanced approach to housing distribution, allocating a proportionate amount of housing land between east and west of the Borough – it is hoped that this will promote additional housing in the east which has previously been considered to be less viable for development 	<ul style="list-style-type: none"> • Continued Viability training • Adoption of a range of allocated housing sites throughout the Borough • Working with LCC and other agencies to improve infrastructure e.g. highways improvements, education capacity
Engagement with the community	<ul style="list-style-type: none"> • Local opposition 	<ul style="list-style-type: none"> • The Local Plan has been through two rounds of public consultation • Once the Local Plan is adopted, there will be greater certainty over where future development is to be located 	<ul style="list-style-type: none"> • Continue to provide regular updates on Local Plan progress via website and direct communication • Encourage more pre-application consultation between developers and local communities • Continue supporting Neighbourhood Plan Forums

Issue	Possible causes of under-delivery	What is currently being done	Key Actions / Responses
Perceived lack of available land	<ul style="list-style-type: none"> •Lack of communication about availability of land / interest from landowners / developers expressing intentions to bring sites forward; •Lack of site promotion 	<ul style="list-style-type: none"> •New Local Plan site allocations; •Recently undertook a site marketing exercise 	<ul style="list-style-type: none"> • Adopt new Local Plan housing allocations; • Place marketing & promotion – Prepare a prospectus of available land promote and advertise land for housing and provide information; • Ensure housing delivery and site promotion is a Corporate priority; • Increase use of developer forums, bringing together planning, economic development, strategic housing and developers to share information
Physical constraints	<ul style="list-style-type: none"> •Site specific constraints including land contamination •Poor access arrangements / highway capacity issues •Legal constraints (e.g. covenants) •Brownfield sites with low values and constraints in portfolio •Limited number of developers in the area / limited housing type offer 	<ul style="list-style-type: none"> •Working with statutory agencies to identify solutions •Infrastructure Delivery Plan •Brownfield Land Register •Self/Custom Build Register •Provide a range of sites / locations for housing in Local Plan to attract more diverse range of housing providers / developers 	<ul style="list-style-type: none"> • Adopt Local Plan housing allocations • Continue to work with statutory agencies, including on strategic infrastructure projects • Make greater use of self and custom build and Brownfield Registers as a promotional tool to stimulate development
Delays in granting planning permission	<ul style="list-style-type: none"> •Whether enough planning permission being granted, and within statutory time limits; •Delay caused by consultation responses and addressing issues raised e.g. Environment Agency; •Whether proactive pre app discussions are taking place to speed up determination periods 	<ul style="list-style-type: none"> •All recent major applications have been approved; •Pre-application service offered and actively encouraged; •Duty Officer service – offers guidance and encourages pre-application submissions 	<ul style="list-style-type: none"> • Greater promotion of pre-application service to ensure issues are resolved early in the process and reduce delays later on; • Review validation checklist to ensure it is up to date; • Improve / tighten validation process – ensure issues have been identified and considered earlier in the process; • Stricter requirements on applicants to conform with validation process - could be part of pre-application service; • Greater use of Planning Performance Agreements
Delays in implementation of planning permission	<ul style="list-style-type: none"> •Barriers to commencement of development after grant of permission, and whether sites are delivered within allotted time •Pre-commencement 	<ul style="list-style-type: none"> •Pre-application service in place and well used 	<ul style="list-style-type: none"> • Review current pre-application service to identify if this can be promoted more effectively and if the procedure can be improved; • Have to consult / adopt a precautionary approach but could use different type of condition; • Applicants and developers could be encouraged to use their own consultants / commission their own contamination studies to identify

Issue	Possible causes of under-delivery	What is currently being done	Key Actions / Responses
	<p>conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)</p> <ul style="list-style-type: none"> • Onerous conditions 		<p>solutions early in the process and have them ready for agreement;</p> <ul style="list-style-type: none"> • Encourage applicants / developers to carry out own studies and identify mitigation / monitoring measures up front; • Opportunities for delivery of alternative forms of housing – rural exception, community led, resource and advice hub for community led housing; <p>Explore possibility of:</p> <ul style="list-style-type: none"> • Prioritising certain applications • Simplifying conditions • Phasing condition discharge • reviewing standard conditions • Streamlining S106 agreements
Lack of development	<ul style="list-style-type: none"> • Whether site mix is proving effective in achieving anticipated delivery rates 		<ul style="list-style-type: none"> • Adopt Local Plan policy on housing mix / type; • Require masterplans for larger sites over 50 homes; • Working with developers on the number of houses on site, including whether sites can be subdivided.
	<ul style="list-style-type: none"> • Permission lapsing / Development becoming stalled 		<ul style="list-style-type: none"> • Where lapse is about to occur, contact landowner / applicant and investigate why • Exploration of alternative delivery arrangements on stalled sites e.g. sites being considered where Council will purchase completed housing
Affordable Housing Delivery	<ul style="list-style-type: none"> • Increasing need for supported housing; • Lack of 3+ bed social housing; • Lack of 1 bed social housing suitable for younger, single people; • Lack of older people's housing in suitable locations; • Increasingly unaffordable Private Rented Sector; • Monopoly of single social housing provider managing majority of stock 		<ul style="list-style-type: none"> • Continue to offer assistance to supported housing providers in relation to advice, identifying suitable sites and buildings, adoption and implementation of Local Plan policy HS19 Specialist Housing; • Continue to work with Social housing developers to deliver new stock including adoption and implementation of Local Plan policy HS6 which requires all developments over 10 dwellings to provide 30% on-site affordable housing; • Allocate a range of housing sites across the Borough, including those of a sufficient size that will provide opportunities for social and supported housing provision; • Encourage a range of providers to operate in the Borough to diversify the market; • Adoption and implementation of HS19 Specialist Housing and HS8 Housing Standards which seeks to ensure new housing development

Issue	Possible causes of under-delivery	What is currently being done	Key Actions / Responses
			considers the needs of elderly or disabled residents or be easily adaptable e.g. in relation to site topography, vulnerability to flooding
Council-owned land and assets	Limited promotion of suitable council owned land, not responding to demand	<ul style="list-style-type: none"> • Accelerated Construction programme • Purchase, Lease or Rent (PLR) process • Restructure of Property Services team 	<ul style="list-style-type: none"> • Identify programme of site release and improve process relating to marketing and sale of council owned land; • Review internal consultation process when land is identified for potential sale e.g. set up procedure to identify relevant officers to provide comments within a specified timeframe • Explore putting Council owned brownfield sites on Part 2 of the Brownfield Register / grant Permission in Principle • Develop a site portfolio, promoting suitable available land

8. Project management and monitoring arrangements

8.1 As identified in the Introduction, this is the first HAP that the Council has produced and at this stage it has focussed more on the identification of key issues and potential solutions, rather than providing a detailed and committed set of actions. It is expected that housing delivery in the Borough may continue to fall below expected targets in the next few years and further reviews will build upon this initial HAP.

8.2 Once the Local Plan is adopted in 2020, a range of housing allocations will be in place which will provide greater certainty and choice for developers and members of the community and will lead to an increase in housing delivery. Even once delivery has improved, the Council will continue to work on actions which help to maintain the supply of dwellings being built as a point of good practice and in recognition of its importance.

8.3 The provision of a sufficient range and diversity of housing is recognised as a fundamental priority for the Borough and actions relating to boosting housing supply and delivery will be monitored closely. Further information on monitoring will be set out in the Local Plan.

Table 6: Key dates and future timetable

Feb 2020	HDT results for 2016/17 to 2018/19
Feb 2020	Housing Delivery Test Action Plan published
June/July 2020	Local Plan Main Modifications consultation
Nov 2020	HDT results for 2017/18 to 2019/20 (if on time)
Dec 2020	Adoption of the Local Plan
May 2021	Publication of updated Housing Delivery Test Action Plan if 2019/20 housing delivery falls below 95% of expected requirement and as good practice