



Broxtowe
Borough
COUNCIL

Broxtowe Borough Council

Housing Delivery Test Action Plan 2022

June 2022

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2021 Housing Delivery Test Results

In January 2022, the Government published the 2021 Housing Delivery Test results for all Local Authorities across England. This set of results noted that Broxtowe Borough Council achieved 85% (804 out of a target of 948, as calculated by the Standard Methodology) of its required delivery of homes – an increase of 2% in delivery since the previous test year. A result of 85% means that Broxtowe is required by the Government to produce a Housing Delivery Action Plan to establish ways in which the Council will support and encourage delivery over the next year, with a view to improving test results.

The Housing Delivery Test

The Housing Delivery Test was introduced by Central Government in 2018 for Local Authorities to use when calculating their housing delivery need over a 3-year period. The test also determines whether targets have been met and establishes a set of implications on Councils for when targets are not met and these are explained below.

Table One:

Delivery rate (%)	Penalty
<95%	Action Plan The Council must produce an Action Plan to identify the causes of under delivery and the necessary actions to address it.
<85%	Buffer As well as producing an Action Plan, the Council must add a 20% buffer of additional deliverable sites for development.

Delivery rate (%)	Penalty
<75%	<p style="text-align: center;">Presumption</p> <p style="text-align: center;">As well as producing an Action Plan and adding a 20% buffer, the Council would also be subject to the presumption. In determining Planning Applications, the Council must apply the presumption in favour of sustainable development, meaning that planning permission should be granted unless the site is protected under the NPPF or the adverse impacts significantly and demonstrably outweigh the benefits.</p>

As a result of these sanctions, it is crucial that Broxtowe does not underestimate the importance of achieving housing delivery targets, or indeed, the implications of the penalties which the Government has established, which could as an end result, impact upon the Council's ability to refuse some planning applications (or make it more difficult for the Council to defend some refusals at appeal).

Prior to the introduction of this method, Councils assessed their housing delivery through a variety of individual and often untested measures, which produced an inconsistent set of results across the UK. Using the Housing Delivery Test going forward (unless they have evidenced an exceptional and justified reason to do otherwise) will mean that local authorities will be generating standardised data and irregularities should be ironed out, hopefully meaning that more accurate and aligned housing delivery figures will be produced nationally.

Assistance on implementing the test has been provided by the Ministry of Housing, Communities and Local Government (now the Department for Levelling up, Housing and Communities) which comes in the form of the 'Housing Delivery Test measurement rulebook' and the 'Housing Delivery Test: 2021 Measurement Technical Note'. In the latter of these two documents, the below calculation is given for Local Planning Authorities to apply their figures to, in order to determine their individual housing delivery and generate delivery percentage.

$$\begin{aligned}
 &\textbf{Housing Delivery Test (\%)} = \\
 &\quad \textbf{Total net homes delivered over a 3-year period} \\
 &\quad \textbf{Divided by} \\
 &\quad \textbf{Total number of homes required over 2-year 7 month period*}
 \end{aligned}$$

*The government website notes that for the 2021/22 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a 3-year period, but an 8-month period has been used for the

2021/22 monitoring year. This is to account for the considerable variations in levels of housing delivery as local planning authorities and the construction industry faced disruption on a national, regional, and local level due to the pandemic. Additionally, an 11-month period has been used for the 2019/20 monitoring year. This was to account for disruption to housing delivery and monitoring caused by the first national lockdown in March 2020.

Purpose, Objectives and Status

As always, Broxtowe Borough Council continues to take a positive, proactive and pragmatic approach to the delivery of housing within the area. This Action Plan will detail the key issues and measures which the Council has and will continue to take in order to boost delivery of housing within the Borough. In preparing this document, the Council has analysed and included data from the latest available Strategic Housing Land Availability Assessment (SHLAA) alongside reference to other documents including the Part 2 Local Plan. The Council will consider any barriers which may be preventing housing from being built and will demonstrate actions which may assist with delivery.

Review of the last year

Before determining any future actions to boost delivery, it is important to evaluate the latest housing delivery data available since the publication of the previous Housing Delivery Test Action Plan.

An improvement in the latest Housing Delivery Test results (a 2% increase) has meant that, unlike last year, Broxtowe Borough Council is not subject to the sanction of adding a 20% buffer of additional deliverable sites for development. In spite of Broxtowe not being required to include a buffer, to ensure a robust 5-year housing land supply, the Council implements the buffer regardless.

Housing Delivery Analysis

This section of the document demonstrates the on-going housing delivery challenges faced by the Council and outlines the steps that the Council has already and will continue to take in order to address the challenges.

Lead-in times and build-out rates have a significant impact upon housing delivery within the Borough. In the majority of cases for large sites, anticipated lead-in times (the time between the date when the site was granted planning permission until the start of construction) and build-out rates (the speed at which houses are delivered

once construction on site has started) are provided by the developer/agent/landowner. Where this information has not been provided, or as a check to ensure that the timescales are realistic, the following lead-in and build-out assumptions are applied:

Table Two:

Type of Development	Lead-in time
New build	Two years for sites with outline permission; One year for sites with full or reserved matters permission
Conversion	Six months for all sites
Change of Use	One year for all sites

Where construction has not started within the above timescales, a year will be added to the assumption (from present) until the permission has lapsed.

Table Three:

Type of Site	Number of new homes built per year
Small sites (1 - 9 dwellings)	Deliverable within 5 years. As to where in the 5 years, a judgement will be made based upon the date of permission granted, and other factors such as discharge of conditions.
Medium sites (10 – 49 dwellings)	Deliverable within 5 years. As to where in the 5 years, a judgement will be made based upon the date of permission granted, and other factors such as discharge of conditions.
Large sites (50+ dwellings)	A judgement will be made based upon the date of permission granted, and other factors such as discharge of conditions. In the absence of other information, 27 homes per year.

The below table, taken from the latest SHLAA, shows the build rates of sites with 50 or more dwellings. It demonstrates that on average sites of over 50 (where the whole site is complete) were delivering 41 dwellings a year. Even in weak housing markets such as Eastwood, developers were averaging 30 dwellings per year, however in the strong housing markets of the Main Built-up Area the average build rate for developers was 45 dwellings a year. Given that this should be treated as a minimum (for the reasons set out previously) this is broadly consistent with the advice from the development industry who stated that 1 dwelling a week (i.e. 52 dwellings a year) was their expected build rate and was considered deliverable. Indeed, this acts as evidence of the Borough's consistent delivery of houses.

Table Four:

Site Address	Settlement	Total Dwellings	Number of years site took to build out	Average Build Rate Per Year
Halls Lane Giltbrook	Eastwood	88	3	29
Giltbrook Dyers & Cleaners Giltbrook	Eastwood	59	2	30
Smithurst Road Giltbrook	Eastwood	91	3	30
Chetwynd Barracks Chilwell	MBA	383	5	77
Bilborough Road Trowell	MBA	194	3	65
Queens Road Beeston	MBA	146	4	37
Alderman White School Chilwell	MBA	56	3	19
Long Eaton Textiles Beeston	MBA	85	3	28
Hassocks Lane, Beeston	MBA	130	4	33
Total		1232	30	41

Housing Challenges

Housing Challenge One – Meeting the Housing Requirement

Meeting the Borough’s housing requirement is the key and overarching challenge feeding into this overall Action Plan. As established in the Aligned Core Strategy, the housing requirement for Broxtowe is a minimum of 6,150 between the years 2011 and 2028. This is shown in the table below.

Table Five:

	2011-2028	2011-2013	2013-2018	2018-2023	2023-2028
Broxtowe Borough Council	6,150	200	1,800	2,150	2,000

2021 Action Plan:

Last year the Council noted the continuation of pre-application discussions for allocated sites as positively facilitating housing delivery through enabling sites to be brought forward for development at a quicker rate. It was also noted that work on the Toton and Chetwynd Barracks Strategic Masterplan SPD had continued to progress with an anticipated adoption date of the end of 2021.

In addition to the above, the 2021 Action Plan cited the NPPF, which states that there are advantages in undertaking land availability assessments in parallel so that land availability and suitability can be considered across a whole range of land requirements. To support this, it was noted that a review of the existing employment land was undertaken in 2019/20 by the Council's Economic Development team. This review assessed whether existing employment sites should be retained for employment use or whether they would be more suitable and available for release for residential development.

A 'Call for Sites' was also conducted and it was envisaged that this would generate additional locations and opportunities for increased housing delivery within Broxtowe.

2022 Action Plan:

Since the publication of the 2021 Action Plan, pre-application discussions for strategic sites continue to contribute towards housing delivery whilst also illustrating the Council's commitment to housing delivery.

Throughout the entirety of 2021, the Toton and Chetwynd Barracks Strategic Masterplan maintained its prominence as a Council priority, which would lead to the significant delivery of much needed homes in the borough. In November 2021, the government published the Integrated Rail Plan (IRP). In this document, it was determined that the planned HS2 hub station at Toton will no longer be going ahead. This has had critical implications, including delays in the process, for the impending Strategic Masterplan, which was largely reliant on this piece of major infrastructure going forward to support and justify other developments (including housing) across the sites in the borough.

As well as the above, the Council has extended our previous 'Call for Sites' by accepting submissions all year round by uploading a form specifically for this on our website. It is hoped that, as a result of this, the Council will receive an uplift of submissions which can be assessed and then added to our SHLAA database.

Housing Challenge Two – Ensuring the Council has a 5-Year Housing Land Supply

Having an up to date 5-Year Housing Land Supply is an important factor in ensuring that there will be enough homes provided within the Borough as it provides an indication as to whether there are sufficient sites available to meet the requirement as established in the adopted strategic policies.

2021 Action Plan:

The 2021 Action Plan noted the interest which the Council had received from developers in relation to strategic sites with reference to two specific planning applications (20/00056/OUT - Land East of the Bypass (Shilo Way) and 20/00641/OUT- Church Lane, Brinsley). In addition to this, it was stated that the Field Farm site in Stapleford had continued to build-out homes and completions.

The Council's commitment to ensuring a 5-Year Housing Land Supply was also demonstrated as Broxtowe voluntarily apply a 20% buffer to the requirement to ensure that the 5-Year Housing Land Supply is robust.

2022 Action Plan:

The Planning Team are continuing to receive a high volume of applications, including a number of Outline applications for new homes, and these are being determined in a timely manner.

In addition to this, since the production of last year's Action Plan, the first phase of the Field Farm site has been completed and this is generated in the Table below.

Table Six:

Field Farm site completions	
2018-2019	4
2019-2020	56
2020-2021	46
2021-2022	12
Phase One is now complete	

Housing Challenge Three – Flexibility of Supply/Choice of Sites

To ensure that the Council meets its housing delivery requirements, there needs to be enough sites available for development and these should also be attractive to a range of different types of house-builders. Therefore, the Council needs to ensure that there is a suitable mix of available sites, with an appropriate inclusion of factors such as affordable housing.

2021 Action Plan:

It was noted in the 2021 Action Plan that the Council had looked to utilise assets for housing development opportunities, which included former garage sites. It was also mentioned that the use of Compulsory Purchase Orders had been discussed and that this was determined to not be a viable option, but could be reviewed again at a later date.

2022 Action Plan:

During the last year, the Council has been looking very closely at the available choice and mix of sites within the Borough and has started to conduct Site Assessments (as part of the Aligned Core Strategy Review) in order to determine the suitability of sites for housing.

Development opportunities, which would positively contribute towards the delivery of new homes, have been identified and are displayed in the table below and it is hoped that the delivery of these will be complete in the near future.

Table Seven:

	Phase 1/2 sites New Build	Development opportunity	Delivery year	New scheme or s106* with planning
				*(A legal agreement entered into 0 to mitigate the impacts of a development proposal)
1	Farm Cottage, Ilkeston Road Bramcote	5 houses & flats for rent	22/23	New
2	Felton Close, Chilwell (Garage court)	2 houses and 2 flats for rent	22/23	New

	Phase 1/2 sites New Build	Development opportunity	Delivery year	New scheme or s106* with planning
				*(A legal agreement entered into 0 to mitigate the impacts of a development proposal)
3	Gayrigg Court, Chilwell (Garage court)	2 houses for rent	22/23	New
4	Inham Nook pub site and Barn Croft garages, Chilwell	12 houses and 3 flats for rent	23/24	New
5	Chilton Drive West, Watnall (Garage court)	2 houses for rent	22/23	New
6	Chilton Drive South, Watnall (Garage court)	2 houses for rent	22/23	New
7	Selside, Chilwell (Garage court)	3 houses for rent	22/23	New
8	Land west of Coventry Lane, Bramcote – s106 site – Peter James Homes	34 houses for rent and 17 for shared ownership	2022 to 2025	S106
9	Land off Field Farm, Stapleford – 106 site - Peveril Homes	22 houses for rent and 4 houses for shared ownership	2022 to 2025	S106

In addition to this, work with partnering authorities on the Aligned Core Strategy Review has positively progressed over the last year and the requirements which will be set should in turn provide more confidence in terms of delivery. It is envisaged that the Greater Nottingham Strategic Plan will be adopted in 2023.

Housing Challenge Four – Maximising Delivery on Urban Sites

Delivery of brownfield sites or sites within existing urban areas can be more challenging than greenfield sites as a result of a number of factors and issues including:

- Uncertainties relating to land contamination and the associated costs of required remediation;

- Neighbouring land use issues (including the proximity of sites to industrial and commercial uses which may conflict with proposals for residential development, due to reasons of air and noise pollution, heavy goods vehicle movements and vibration);
- Constraints of existing infrastructure (including the capacity of existing highways);
- Often the sites are smaller and may therefore result in a lower developer return;
- Sites may be less attractive to volume house builders than greenfield alternatives;
- Potential additional costs associated with demolition and waste removal.

It can be concluded that such sites may be less appealing to the development industry and can take longer to deliver due to viability issues.

2021 Action Plan:

Last year's Action Plan noted that the Council continued to identify potential sites for residential development within the Main Built-up area as well as maintaining regular communication with site owners to ascertain whether sites may come forward for housing.

2022 Action Plan:

As detailed within 'Housing Challenge Three', the Council is currently working on the assessment of strategic sites, with a view to putting a number of sites forward for potential locations for housing development. As part of this, it has been important to consider both the existing land-use and location of these sites. In many cases a site is more desirable for development if the land is an urban site or is situated adjacent to an existing urban area. With this in mind, the Council envisage that this process will ultimately have a positive impact upon housing delivery within the Borough.

Housing Challenge Five – Viability / Housing Market Factors

Within Broxtowe, there are both affluent areas and pockets of deprivation. In weaker housing markets the delivery of housing is often harder to achieve. This is because the return for the developer is often lower whilst the cost of building the houses remains constant. In addition, across the Borough, brownfield sites can often be more challenging to deliver due to uncertainties relating to land contamination and highway capacity which can mean that their viability is more uncertain.

2021 Action Plan:

The 2021 Action Plan referenced the Council's engagement with landowners as well as the borough's proactive approach towards non-implemented planning permissions. It was noted that this has resulted in some discussions with owners where general pre-application advice was given, and in some cases, it was indicated that a planning application may be received in the future.

2022 Action Plan:

Since the production of last year's Action Plan, the Council has continued to engage effectively with landowners and has, in many cases, provided general verbal advice with a view to making the application process as smooth and as straight forward as possible for future applicants. Liaison with developers in relation to non-implemented planning permissions has also continued and non-implementations are being monitored closely.

Housing Challenge Six – Political and Community Sensitivity

The delivery of homes can often be a contentious issue that is resisted and met with opposition by the local community. As a result of this, one of the main challenges in bringing sites forward is reconciling the need to build new homes with the political and community aspirations for an area. Therefore, in order to facilitate the delivery of much needed homes, it is beneficial to have support from those living in nearby areas.

2021 Action Plan:

The 2021 Action Plan references the building and maintenance of positive relationships between the Borough Council and the Neighbourhood Forums and Parish Councils through the implementation of a designated Officer who works closely with the groups.

It was further noted that a referendum for the Awsworth Neighbourhood Plan had been held which saw a majority vote in its favour, as well as the progress made on a number of other Neighbourhood Plans in the borough.

2022 Action Plan:

The Awsworth Neighbourhood Plan was adopted by Broxtowe on 21st July 2021 and it is envisaged that the Chetwynd: The Toton and Chilwell Neighbourhood Plan will also be adopted within the year. As well as this, work on other Neighbourhood Plans continues to progress and the Council has continued to build upon positive

relationships with Neighbourhood Forums and Parish Councils in order to facilitate effective joint working.

Housing Challenge Seven – Planning Reform Uncertainty

2021 Action Plan:

Last year, the Council expressed concern that the government's reform of the planning system through new legislation, following the associated White Paper, may have an impact upon rates of housing delivery. Specifically, it was noted that if developers consider that they may be in a more advantageous position following new legislation, there is a risk that they may defer from taking decisions or proceeding with development until greater clarity is available in relation to the potential implications of the new legislation.

2022 Action Plan:

Since the production of last year's Action Plan, there have been further updates and changes to the planning system – including an updated NPPF (published in July 2021). In addition to this, the Levelling Up Bill (introduced to Parliament on 11 May 2021) has become a further source of uncertainty.

It remains to be seen what the impacts of these changes will be but the Council is committed to keeping up-to-date with any amendments in order to be as prepared as possible for any implications which may arise as a result.

Housing Challenge Eight – Covid-19

2021 Action Plan:

The 2021 Action Plan stated that the emergence of Covid-19 had created a number of challenges for the Council as a whole, including ensuring that all departments, including the Planning department, could continue to operate and function as normally as possible.

Concern was also expressed that some developers may not wish to commit to proceeding with large development schemes, for reasons such as the availability of capital funding as well as the availability of workers. In spite of these apprehensions, the Council endeavoured to minimise concern by maintaining close communication with developers and also provided support and reassurance through measures such as determining planning applications in a consistent and timely manner.

2022 Action Plan:

Although the pandemic has been within society for over two years, its implications remain to be far-reaching and overcoming the challenges created by the virus cannot be achieved overnight. Therefore, the concerns referenced in last year's Action Plan are still largely relevant. However, in spite of this, the Council will continue with its positive and pragmatic approach to housing delivery and will persist with determining applications in a thorough and conscientious manner.

Management, Implementation and Monitoring arrangements

Broxtowe's effective and consistent monitoring of information and data not only assists the Council in identifying past trends and patterns, but also helps enable the Council to anticipate and prepare for potential issues and have readily available solutions to overcome these.

The Council monitors housing delivery information through a range of different systems and measures. For example, an annual Authority Monitoring Report is published every year which provides up to date and detailed information and gross figures in relation to planning permissions for strategic sites as well as completions by dwelling size, type and tenure. The Council conducts site visits to monitor the progress of developments to ensure that housing delivery information is accurate and up-to-date.

In order to successfully implement the proposals and actions set out within this Plan, Broxtowe Borough Council will exercise a co-operative and coordinated approach and will also ensure that this work is monitored effectively whilst always maintaining up-to-date knowledge of legislation and the Borough's housing delivery position.

The Planning Policy Team is responsible for reviewing this Action Plan annually. This will be conducted following the Government's publication of the Housing Delivery Test results which are due to be released each November. As a part of this process, the Team will consider any potential additions to the Action Plan and whether any amendments are necessary, and will make such adjustments accordingly.

The Council welcomes any suggestions on possible future actions to help support housing delivery within Broxtowe Borough. You can contact the Planning Policy Team by the following methods:

Telephone: 0115 917 7777 (Please ask to be put through to Planning Policy)

Email: Policy@broxtowe.gov.uk

Postal address: Planning Policy Team, Chief Executive's Department,
Broxtowe Borough Council, Council Offices, Foster Avenue, Beeston,
NG9 1AB.

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