

Report to Cabinet

Subject: Gedling Borough Housing Delivery Action Plan August 2019 and
Gedling Borough Five Year Housing Land Supply Assessment
2019

Date: 1 August 2019

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Wards Affected

All

Purpose

To note the Gedling Borough Housing Delivery Action Plan and the Five Year Housing Land Supply 2019 Assessment which has been updated.

Key Decision

No

Recommendation

THAT Cabinet:

- 1) Approves the Gedling Borough Housing Delivery Action Plan 2019 for publication; and**
- 2) Notes the Gedling Borough Five Year Housing Land Supply 2019**

1 Background

- 1.1 This report comprises two parts containing Part A covering the Council's requirement to publish a Housing Delivery Action Plan and Part B which reports on the latest Gedling Borough Five Year Housing Land Supply position at 31st March 2019. Whilst the two documents are separate they cover the related subjects of housing delivery and supply. It is helpful for the two documents to be read alongside one another with the recommendation that Cabinet notes each individual document. The Housing Delivery Action Plan is attached as Appendix A and the

Gedling Borough Five Year Housing Land Supply Assessment 2019 is at Appendix B.

Part A Housing Delivery Action Plan

- 1.2 The Ministry of Housing, Communities & Local Government (MHCLG) published the results of the first Housing Delivery Test on 19 February 2019. In summary, the Housing Delivery Test compares the net homes delivered over the last three financial years to the homes required over the same period.
- 1.3 The 2018 figure for Gedling Borough Council is **51%** and is based on the three year period 2015/16 – 2017/18. There are two consequences of the 2018 Housing Delivery Test results for Gedling Borough Council. Firstly, the Council is required to prepare an Action Plan and publish this by 19th August 2019 and, secondly, a buffer of 20% must be applied to the supply of deliverable sites for the purposes of housing delivery assessment. The Council already applies an additional 20% buffer to the five year supply of housing land and no change is required. Gedling Borough's first Housing Delivery Action Plan (HDAP) is attached which sets out the actions the Council intends to take over the short/medium term to increase the delivery of new housing.
- 1.4 This HDAP has two roles, firstly to provide an analysis of the key reasons for the under delivery of the Council's housing requirement and, secondly, to identify the measures the Council intends to undertake to increase/maintain delivery of new housing. It is acknowledged that housing delivery is a complex process and that some causes of under delivery are outside of the Council's control. It is also the case that other Councils covering the Nottingham urban area are also experiencing under delivery for similar reasons.
- 1.5 Cabinet is advised that the actions set out include a number of on-going actions carried out by officers prior to and since the adoption of the Local Planning Document as well as new actions identified following a thorough review of past housing delivery performance as set out in the document. The HDAP recognises that housing delivery is a Council priority and the document has benefited from corporate input and the actions involve a number of departments from across the Council. The views of key stakeholders, site developers and owners have also been sought and considered as part of the preparation of this document.
- 1.6 The remainder of Section A of this report provides a summary of the HDAP and identifies key points for particular attention.

Planning Policy Context

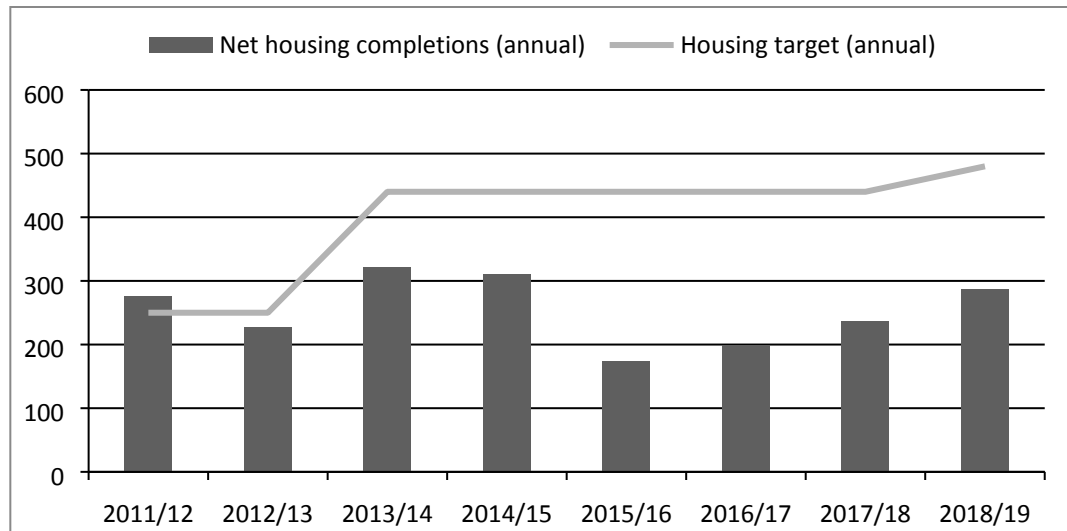
- 1.7 The Aligned Core Strategy which is Part 1 of the Council's Local Plan sets a housing requirement of 7,250 homes over the plan period. The housing requirement is staggered, with the annual housing requirement increasing up to the end of 2023 thereby setting an increasingly challenging target as shown in table 1 below.

Table 1: The Aligned Core Strategy Housing Targets for Gedling Borough

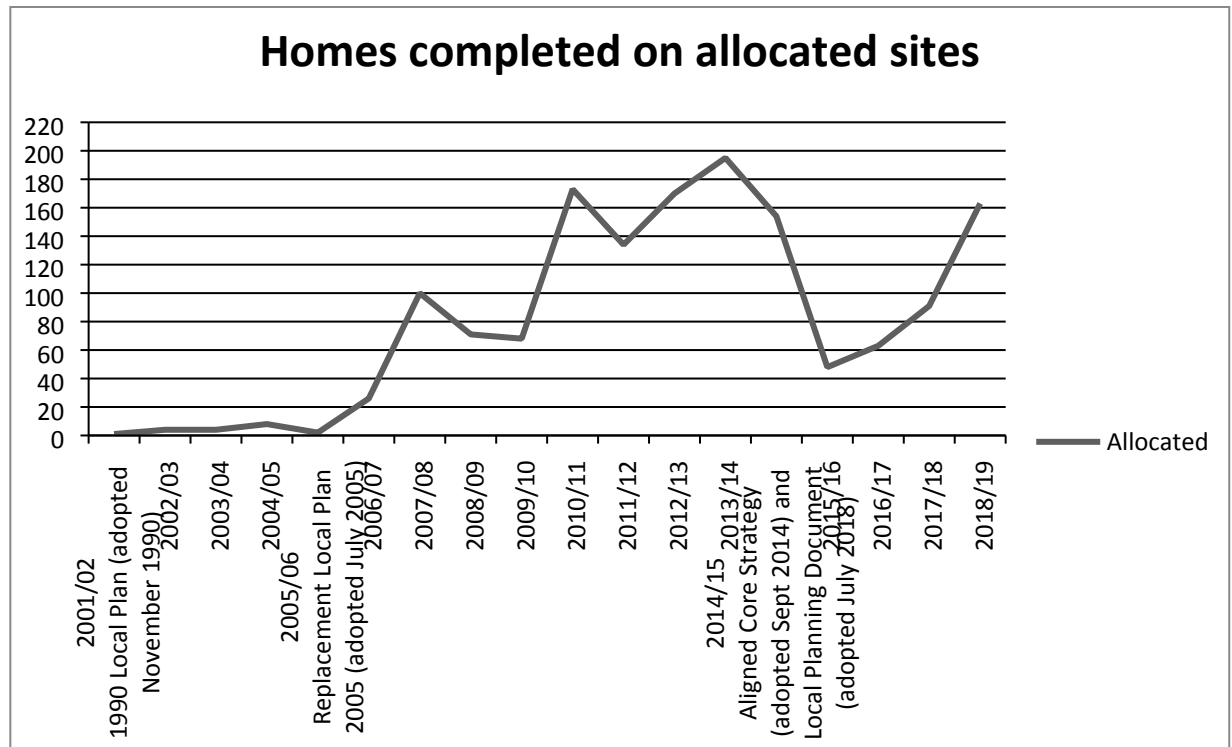
| 2011 – 2013 | 2013 – 2018 | 2018 – 2023 | 2023 – 2028 | Total |
|------------------------|------------------------|------------------------|------------------------|--------------|
| 500 | 2,200 | 2400 | 2150 | 7,250 |
| 250 p.a. | 440 p.a. | 480 p.a. | 430 p.a. | |

- 1.8 Gedling Borough Council carries out an annual review of its Strategic Housing Land Availability Assessment (SHLAA) providing information on housing sites obtained from developers including likely delivery timescales. This annually updated information has fed into the data analysis set out in the HDAP. In addition, landowners and developers are invited to respond to the question of: "How can the Council help in bringing forward your site?" Responses to this question have been collated over the past three years and considered as part of the preparation of the HDAP.

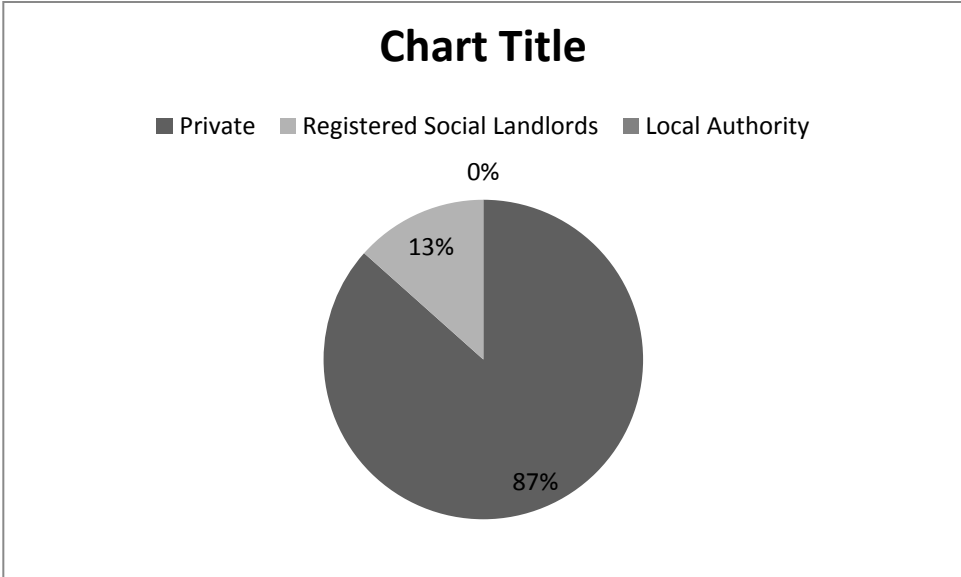
Housing Delivery Analysis Past performance



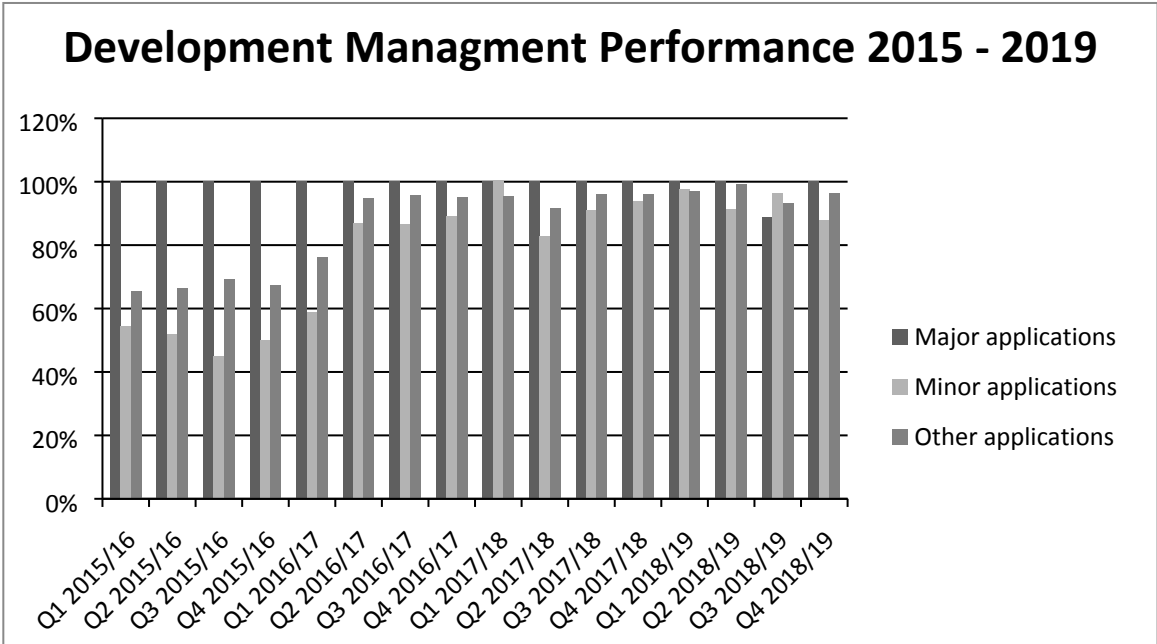
- 1.9 As shown in the graphic above, housing completions (shown in bar graph) met the target (line graph) for the first two years (cumulatively) but delivery has been erratic since and completions for each year are below the annualised housing target. (It should be noted that the Housing Delivery Test uses a different method of calculating homes delivered and housing targets which is explained in the footnote on page 7 of Appendix A).
- 1.1 The graphic below shows the impact of adopting a local plan on housing delivery. It shows how the adoption of the 2005 Replacement Local Plan led to allocated sites being delivered quickly from 2006/07 onwards. This is because there is an inevitable time lag between the adoption of a local plan and the actual delivery of homes on sites. A similar pattern is expected over the next few years following the adoption of the Aligned Core Strategy and Local Planning Document.



- 1.1 The majority of homes delivered (77%) are on large housing sites (over 10 homes);
1 a trend which will continue in future. The Borough is heavily dependent on the delivery of large sites with each site having unique site specific issues.
- 1.1 The analysis indicates that not all planning permissions have been implemented
2 which tends to be more of a problem for smaller sites (56 sites unimplemented) with only one large site unimplemented. Whilst the number of dwellings associated with the unimplemented planning permissions on small sites is a relatively modest 95 homes, it would make a useful contribution to the housing supply.
- 1.1 The housing market is dominated by the private sector who delivered around 87%
3 of the completed homes since 2011 (see pie chart below) and will continue to do so in the future. Registered Social Landlords delivered the remainder (13%) and the Council does not build homes. This shows the importance of large privately owned housing sites which make up the bulk of the Council's future housing supply and hence where efforts are best directed in order to assist in bringing forward these sites especially in partnership with developers.



1.1 There are a large number of unimplemented plots with planning permission totalling
4 2,524 homes. These include both sites with full planning permission and those with outline planning permission. In the latter case it will be necessary to obtain the approval of reserved matters before housing delivery can commence. In this context it is anticipated that housing delivery from sites with planning permission will increase over time. The Council's performance in terms of determining planning applications is not an issue and there has been an improved and sustained performance over the last three years and statutory targets have been exceeded as shown below.



Housing Delivery Analysis – Site Specific Allocations

- 1.1
5 In general good progress in being made in terms of delivering the allocated housing sites. Three of the four large strategic housing sites (Gedling Colliery/Chase Farm, North of Papplewick Lane and Teal Close) are under the control of national housebuilders and are now delivering homes. The Council is actively working in partnership with the owners of Top Wighay Farm to bring this site forward. Similarly non-strategic allocations are also coming steadily forward through the planning process although there are some sites where progress is slow and these are identified in the Action Plan.

Housing Delivery Analysis – Engaging with developers

- 1.1
6 Section 5 of the Housing Delivery Action Plan highlights work already completed or on-going in terms of the preparation of development briefs, pre-application advice and the setting up of a number of working groups for specific sites in partnership with developers. Developer forums at both the local and Nottingham housing market area level have also provided useful fora for discussions and for generating potential solutions. The above mentioned fora have identified timely local plan delivery, adequate resources and solutions tailored to the individual sites as being particularly helpful actions.

Housing Delivery Analysis – Viability and Infrastructure

- 1.1
7 Evidence gathered as part of the preparation of the Local Planning Document indicates that the allocated housing sites are broadly viable. In general infrastructure provision required to support growth is not identified as a particular issue although the delivery of the Gedling Access Road which is already a Council priority is critical for delivering around 1,000 homes. The other significant infrastructure issue relates to the need to agree appropriate developer contributions towards the build costs of a new primary school to serve the Arnold primary school catchment.

Key Actions

- 1.1
8 Section 7 of the Housing Delivery Action Plan identifies a number of specific actions within the following themes: housing supply, site specific actions, engaging with developers; and around infrastructure provision. As stated earlier many actions are on-going in recognition that under delivery is not a new phenomenon.
- 1.1
9 In terms of housing supply, the actions identify the need for timely reviews of the Local Plan and in this regard the review of the Aligned Core Strategy has already commenced. Cabinet has also agreed to look into the feasibility of setting up a Housing Company. There is scope as part of future SHLAA reviews to be more proactive in identifying potential housing sites, an action to be taken forward as part of the 2020 SHLAA review.

- 1.2
0 Turning to the strategic and non-strategic housing site allocations. The document assesses progress on each site to establish whether action is required or not. In a number of cases no action is required and in some cases actions relate to aspects of the detailed planning process and decision making which the Council will facilitate in carrying out its statutory duties. In certain cases officers are working in partnership with landowners and developers to secure public funding to help bring forward sites for example, at Rolleston Drive and Top Wighay Farm. In a few cases there is a need to be more proactive for example to contact/meet with the land owner/developer to assess progress.
- 1.2
1 Much effort is being directed at engaging with and working in partnership with developers. As stated above there are a significant number of unimplemented small sites with capacity for around 100 homes and these are to be reviewed given the propensity to make a modest but non the less important contribution to housing supply. The Self-Build and Custom Build Register is in place and provides a means to make registered people aware of plans for self-build and custom build as they are proposed.
- 1.2
2 The delivery of the Gedling Access Road is critical to delivering a significant percentage of Gedling Borough's housing supply and delivery of this new road is a Council priority. The other action relating to the provision of infrastructure relates to facilitating an agreement between the County Council and developers on the contributions towards a new primary school to serve the Arnold primary catchment area which is an on-going project.

Conclusions on Part A Housing Delivery and Action Plan

- 1.2
3 The reasons for under delivery of housing in the recent past are complex and other Councils around the Nottingham Housing Market Area have also under delivered. Often these reasons are due to factors beyond the Councils' direct control such as the general economic situation, house prices, affordability and availability of mortgage finance. However, there are a number of actions which officers can take to help bring sites forward as set out in the Section 7: Key Actions of the Housing Delivery Action Plan.
- 1.2
4 The supply of homes is expected to steadily increase over the next few years as the allocated sites in the recently adopted Local Plan come forward together with extant planning permissions through the detailed planning process. The Council is heavily reliant on a number of large and medium privately owned greenfield sites and it is logical that more effort is directed towards bringing these larger sites forward as quickly as possible. In this context, good progress is being made with housing delivery commenced at Gedling Colliery/Chase Farm, Teal Close and North of Papplewick Lane. Small sites and windfalls have the potential to make a useful contribution to housing supply and appropriate actions are included to encourage housing delivery from these sources.

- 1.2 It is recognised that the housing targets in the adopted Local Plan are challenging
5 and the implementation of the HDAP is likely to prove a long term commitment and
this document will need to be reviewed annually.

Part B Gedling Borough Housing Land Supply

- 1.2 The Five Year Housing Supply Assessment has been updated to take into account
6 the position as at 31 March 2019. The assessment includes the housing sites
allocated in the Local Planning Document which was adopted by Council on 18
July 2018. The five year period is 1 April 2019 to 31 March 2024 and the
assessment is attached as Appendix B. For clarity, this is the assessment against
the housing requirement of the Aligned Core Strategy which is used in the
determination of planning applications.

- 1.2 The National Planning Policy Framework requires that local planning authorities
7 update their five year housing land supply assessment on an annual basis.

- 1.2 The methodology for undertaking the assessment was amended slightly in the light
8 of discussions which took place through the examination of the Local Planning
Document. In summary:-

- The source of sites remains the same. However, a stricter approach has been taken with regards to unallocated sites without planning permission, in that where information has not been provided to demonstrate that they will be developed, these sites have been excluded from the five year supply;
- The windfall allowance comes forward from 2022/23 onwards to accord with the Local Planning Document Inspector's Report;
- The Council continues with the Sedgefield approach which means any shortfall (or surplus) is distributed across the five year period;
- The Council adopts a 20% buffer due to the Housing Delivery Test 2018 result for Gedling Borough Council (51%) which is below 85% of the housing requirement;
- The Council continues to consider the five year period starting from the current financial year rather than taking a forward look approach. The five year period covers 1 April 2018 to 31 March 2023;
- A lapse rate continues not to be applied, to accord with the National Planning Policy Framework; and

- The methodology used to calculate the five year supply accords with the PAS advice.
- 1.2 The assessment shows that against the housing requirement of the Aligned Core Strategy, Gedling Borough Council does have a five year plus 20% buffer supply of land for housing. The Council has a 5.08 year supply. This is a decrease from the 2018 assessment's figure of 5.10 year supply.

2 Proposal

- 2.1 To ask Cabinet to note the content of the Gedling Borough Housing Delivery Action Plan 2019 attached as Appendix A summarised in Part A of this report; and to note the Five Year Housing Supply Assessment 2019 set out in Appendix B summarised in Part B of this report.

3 Alternative Options

- 3.1 Government requires that Gedling Borough Council prepares and publishes a Housing Delivery Action Plan by 19th August 2019. There is therefore no alternative option available other than to prepare the Housing Delivery Action Plan. Members could consider alternative actions within the plan but these actions are those recommended by officers based on best practice, evidence and previous experience.
- 3.2 The National Planning Policy Framework requires that local planning authorities update their five year housing land supply assessment on an annual basis and there is no alternative option other than to prepare the Gedling Borough Five Year Housing Supply Assessment 2019.

4 Financial Implications

- 4.1 The cost of the preparation, publication and implementation of the Gedling Borough Housing Delivery Action Plan can be met within existing budgets. Housing delivery has implications for future income in terms of planning application fees, CIL income and Council Tax receipts.
- 4.2 There are no financial implications arising out of producing the Five Year Housing Supply Assessment 2019 which is met through existing budgets.

5 Appendices

- 5.1 **Appendix A** - Gedling Borough Housing Delivery Action Plan August 2019

5.2 **Appendix B** - Gedling Borough Five Year Housing Land Supply Assessment 2019

6 Background Papers

6.1 None

7 Reasons for Recommendations

7.1 To draw Cabinet's attention to the results of the Housing Delivery Test and to approve for publication the Council Housing Delivery Action Plan; and also to note Gedling Borough Council's Five Year Housing Land Assessment 2019.