

Braintree District Council Housing Delivery Action Plan

August 2020

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1 Introduction

- 1.1 In 2018 the Government introduced a Housing Delivery Test (HDT) for local planning authorities in England. This measured housing delivery over the previous three years with the plan targets that applied at that time. Publication of the HDT results is planned to be in November each year, although publication of the 2019 results was delayed to February 2020.
- 1.2 The target to pass the Housing Delivery Test is 95%; all local authorities where net housing supply was less than 95% of the target must prepare a Housing Action Plan.
- 1.3 If supply is less than 85% of the target for the previous 3 years, the buffer required in the 5 year supply assessment is increased from 5% to 20%.
- 1.4 If supply is below a specified level, this results in a presumption in favour of sustainable development. For the 2019 HDT (measuring supply 2016/17 to 2018/19) it is 45%.
- 1.5 The target is defined by the adopted Plan annual average when the Local Plan is less than 5 years old; once the Plan reached 5 years old it is measured against, for up to 2017/2018, the annual average requirement according to a ten year period from the household projections; and from 2018/2019 the new housing need methodology.

2 The Results in Braintree District

- 2.1 The results against target for Braintree District 2016/2019 in the Housing Delivery Test are set out in Table 1. Braintree needs to produce an Action Plan but was confirmed as a 20% buffer authority for the 2019 HDT results:

Table 1: 2019 Housing Delivery Test Results Braintree District		
	Target	Supply
2016/2017	504	291
2017/2018	640	491
2018/2019	849	555
Total 2016/2019	1993	1337
Shortfall against 100% target 2016-19		655
Shortfall against test of 45% of target		67%

- 2.2 For the 2019 HDT, the target for Braintree was based on the adopted Core Strategy for part of Year 1 (2016/2017). As this document became more than 5 years old during part of Year 1, and all of Year 2 and 3 (2017/2018 and 2018/2019) was then based on the nationally prepared household projections and the standard methodology. .
- 2.3 There are 27 local planning authorities which are required to just produce a Housing Action Plan in 2020 (i.e. from the 2019 HDT results). 76 local planning authorities are now required to apply a buffer, and 8 local planning authorities are now in the presumption.

Figure 1 compares the results for Braintree with the other authorities in Greater Essex:

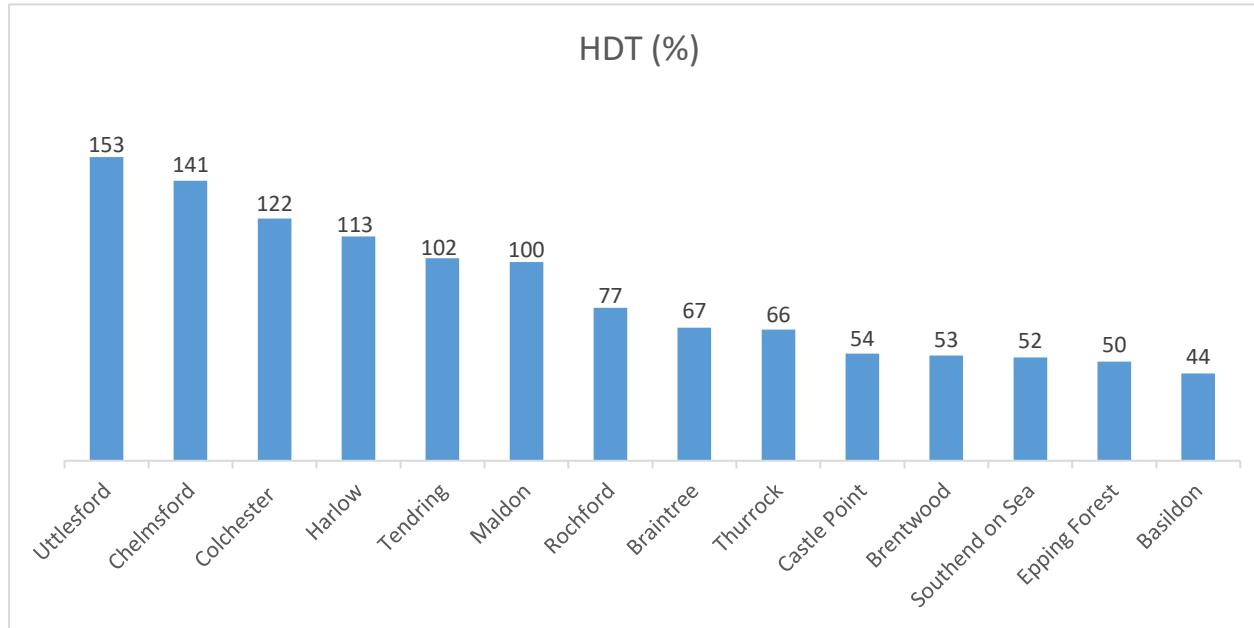
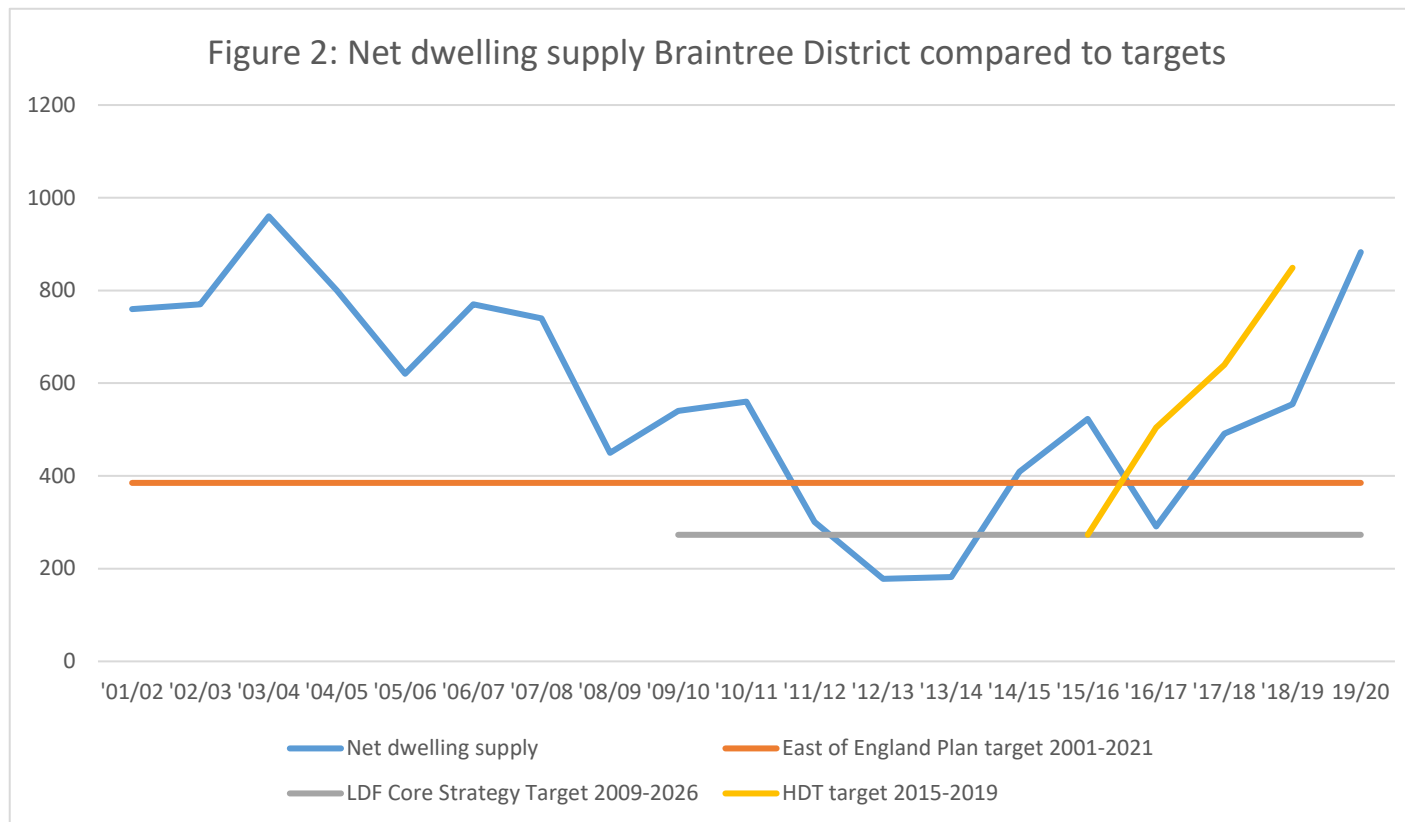


Figure 2 sets out the Councils actual completion rates per year alongside various targets which were in place at the time of recording the results.



3 Increase in the stock of sites with planning consent

3.1 Recognising that the District housing target rose dramatically from that set out in the 2011 adopted Core Strategy, the Council has been granting permission for new homes on suitable sites to meet the new target.

Figure 3 illustrates the increase in the stock of sites with planning consent in Braintree District from 2015.

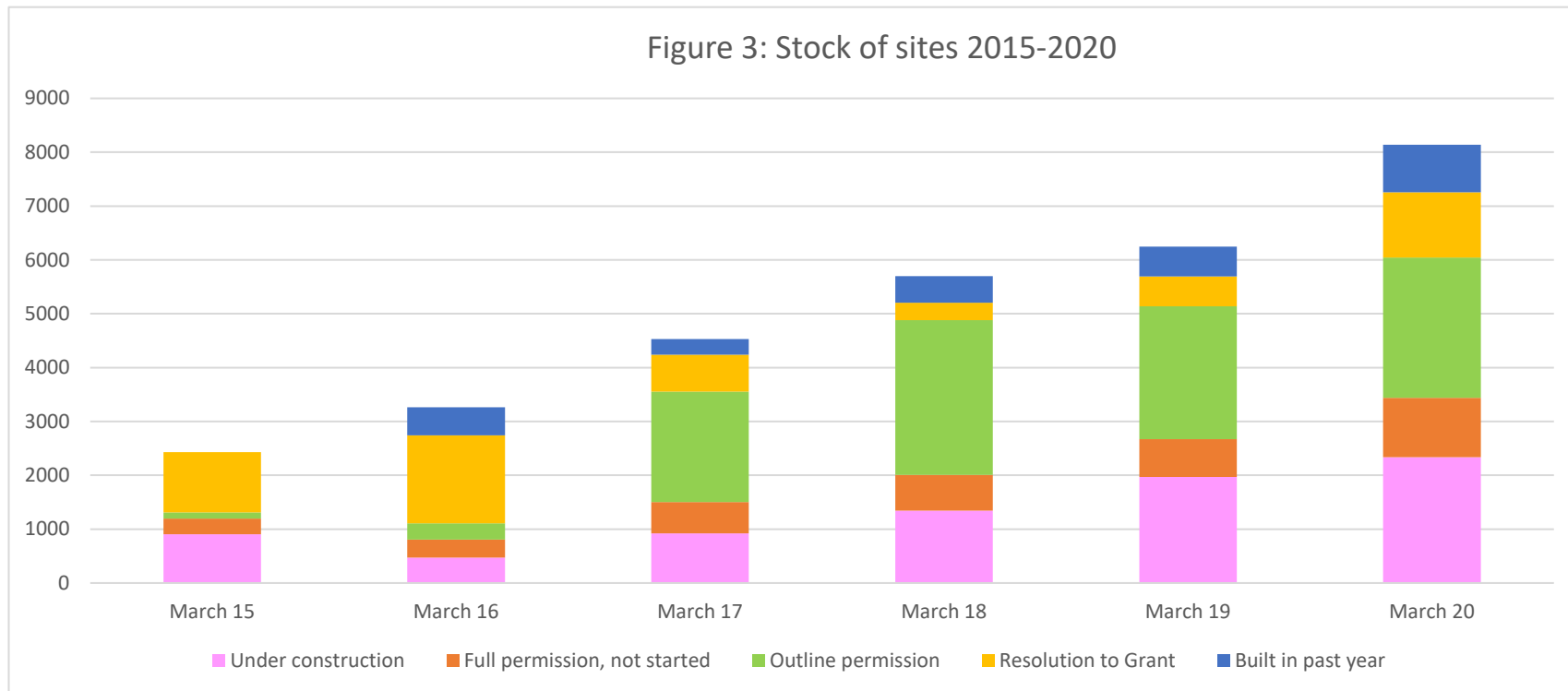


Table 2 sets out the figures for the stock of sites with permission by planning status, and also sites with a Resolution to Approve, from March 2015 to March 2020.

Table 2: stock of sites with permission, and sites with a Resolution to Grant						
Category of site planning status	March 15	March 16	March 17	March 18	March 19	March 20
Under construction	904	474	921	1342	1970	2339
Full permission, not started	293	333	585	665	704	1100
Outline permission	115	304	2046	2874	2465	2606
Resolution to Grant	1120	1630	687	326	554	1211
Total	2432	2741	4239	5207	5693	7256

- 3.2 Comparing the stock of sites either with permission or with a Resolution to Grant in 2015 and in 2020, the supply of sites increased by 4824 over the five year period.
- 3.3 The sites which have been approved or allocated within the Local Plan are of various sizes and are in various locations spread across the District. 30% of 40% affordable housing is also achieved on all sites of 10 or more.
- 3.4 Analysis of the time between the gaining of detailed planning permission and the start of construction on site has been found to be quicker than averages set out in national studies and therefore the authority considers that the way it is dealing with pre commencement or discharge of conditions or reserved matters is effective.
- 3.5 There are no inherent issues with stalled sites in the District, once planning permission is granted then these are normally built out. This will continue to be monitored and any issues dealt with on a case by case basis.
- 3.6 Viability is not generally an issue which causes delay on site development in the District although this differs on a site by site basis and sites which involve previously developed land or regeneration sites are more likely to be faced with viability issues. It is unclear whether this position will change in future years to recessions or challenges brought about by the UK exit from Europe or the covid 19 situation.

- 3.7 However the authority notes that the increased number of homes with planning permission has in some cases come from greenfield sites which are not allocated in the adopted or submitted Local Plan and that this has caused concerns from residents of the District about the number of sites which have been approved outside of the Local Plan process and the impact this may have on the provision of infrastructure.
- 3.8 The authority is therefore confident that in line with recommendations from the Letwin Review that there is a sufficient range of sites, homes and developers operating in the District to ensure an efficiency of delivery.

4 Key Issues and Challenges facing the District

- 4.1 Whilst the Council has continued to increase the number of permissions for new homes within the system it has identified four key issues set out below which could be preventing the authority reach its Housing Delivery Target. These challenges have been identified following experiences of the officers and members of the authority and discussions with key stakeholders and the development industry.

Step up in number of homes required.

- 4.2 The adopted 2011 Core Strategy was based on the now revoked East of England Plan and set a relatively low housing target for the District based on an assessment of locally generated need. This was despite a step-change increase in housing targets for the region as a whole - focused on Key Centres for Development and Change - and was in recognition of issues affecting Braintree District including the increase in long distance commuting and concern that infrastructure and employment growth had not kept pace with housing growth in past Plan periods.
- 4.3 With the revocation of the East of England Plan, the housing provision in the emerging Draft Local Plan for Braintree District sharply increased the housing target for the District. The target in the Core Strategy was an average of 273 dwellings.per.annun (dpa).; the target for 2017/18 in the Housing Delivery Test was 640 dwellings, and the draft Local Plan target over the Plan period 2013-2033 is 716 dpa. Coinciding with the slow and initially fragile recovery in housing market conditions after the severe recession, sites were not yet in place at the start of the Draft Plan Period to support the higher level of homes required; housebuilding lead times and delivery rates remained affected by economic conditions, and delivery in recent years has been below the proposed target rate.

Ensuring the delivery of the Local Plan

- 4.4 The Council submitted its Local Plan for examination in October 2017 and the document remains under examination by the Planning Inspectorate. A main modifications consultation on the shared section 1 of the Plan is currently underway.
- 4.5 Whilst the Local Plan is being examined draft allocations within the section 2 Local Plan have being coming forward in advance of the examination.

Appeals

- 4.6 The Council has in common with many other authorities seen an increase in the number of residential appeals which have been lodged. This takes planning resources away from determining planning applications to dealing with these appeals, particularly the work which is required when the matter is dealt with by inquiry. The Council has also seen several decisions 'recovered' or 'called in'. This includes situations where the authority has resolved to grant planning permission. There have been severe delays until the final decision has been issued, which in turn has an obviously knock on effect regarding the delivery of the homes.
- 4.7 The consistency of appeal decisions particularly where they relate to the 5 year housing supply and the deliverability of sites has also led to uncertainty and risk for both the local authority and developers in the District but has also had a detrimental effect of District residents. The Council wrote in 2019 to the Secretary of State regarding how different sites were treated completely different in different appeal results on the matter of their deliverability within the 5 year housing supply but has never receive a substantive response.

Market Factors

- 4.10 There are a large number of factors which affect the rate of house building in the District, and indeed nationally, which are in many cases beyond the control of the local planning authority. These include;
- The availability of finance
 - The availability of skilled construction labour
 - The availability of building materials
 - The uncertainty brought about by the UK leaving Europe
 - The delay in house building due to covid 19 including during lockdown but beyond due to social distancing measures needed to be in place on sites
 - The potential economic impact of covid-19 and the impact it will have on the housing market and the wider economy.

5 Action Plan

5.1 The table below sets out the work the local authority has identified to carry out to continue to increase house building in the District in order to meet the requirements of the HDT.

Proposal	Actions	Responsible team	Timescale
Facilitate access to construction skills	Through the Braintree District Education and Skills board facilitate conversations between employers and education providers to ensure the right skills are being gained by school leavers	Economic Development team	Ongoing
Ensure that construction roles and careers are promoted	Promote construction skills through events such as the annual career fair, apprenticeship events and the annual job fayre organised by Braintree District Council	Economic Development team	Ongoing
Increase the use of Planning Performance Agreements	Increase the use of Planning Performance Agreements (PPAs) between the local authority and developers of residential sites to ensure deliverable timescales for determination of a planning application.	Development Management	Ongoing
Implement the efficiencies set out in the Development Management Service Improvement Plan	The Plan has a number of projects to maximise the use of IT and secure efficiencies in the processing and determination of planning applications	Development Management	Ongoing
Continue to offer a Pre Application service	Continue to promote the opportunity for developers to engage in pre application discussions with planning officers to enable any scheme issues to be dealt with prior to the submission of a formal planning application	Development Management	Ongoing
To continue to seek detailed information on site progress for	To continue to seek detailed information on site progress and anticipated delivery rates from all sites over 10 homes in the District.	Planning Policy	Ongoing

the development industry			
To strengthen the relationship between the authority and the development industry	To hold regular meetings with developers operating or seeking to operate in the District to ensure open conversations and early identification of issues which might cause an impediment to the delivery of homes on a site or many sites	Planning Policy/ Development Management	Ongoing
To bring forward the I-construct Project	An innovation in construction hub will be built in Braintree in a partnership between the District Council and the Haven Gateway Partnership. A three year European funded project will be based at the hub engaging with small and medium sized construction businesses to promote and development new and efficient ways of working.	Economic Development/Haven Gateway Partnership	Operational 2021
To adopt the Local Plan	To continue to work with the Planning Inspectorate to work efficiently through the Local Plan examination and adopt an up to date Local Plan for the District.	Planning Policy	2021
To consider CPO powers to unlock sites	The Council is considering the use of the CPO powers to bring sites together or unlock redundant or previously developed sites for suitable residential sites	Planning Policy	As required
To make the most efficient use of Council owned sites	The Council is currently regenerating a town centre site which will include residential development and has recently agreed to dispose of a number of unused sites in the District where housing may be suitable	Strategic Investment	Spring 2021
Liaison and support for our main Registered Providers	The Council will continue to regularly meet with Registered Providers to ensure a positive relationship and opportunities for development or redevelopment are maximised.	Strategic Housing/Planning Policy	Ongoing
Regular dialogue with Homes England and MHCLG	Ongoing and regular dialogue with Homes England and MHCLG to consider delivery issues and address constraints identified. This includes actively considering available funding streams.	Planning Policy	Ongoing