

Public Document Pack



COMMITTEE:	JOINT OVERVIEW AND SCRUTINY COMMITTEE
DATE:	MONDAY, 21 SEPTEMBER 2020 9.30 AM
VENUE:	VIRTUAL MEETING

Members	
<u>Conservative Group</u> Sian Dawson Mary McLaren Adrian Osborne	<u>Green Group</u> Terence Carter Keith Welham (Co-Chair) Jane Gould
<u>Conservative and Independent Group</u> James Caston Lavinia Hadingham Dave Muller	<u>Independent Group</u> Kathryn Grandon Alastair McCraw (Co-Chair) <u>Liberal Democrat Group</u> Keith Scarff

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AGENDA

PART 1

MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT

Page(s)

- 1 **APOLOGIES AND SUBSTITUTES**
- 2 **DECLARATION OF INTERESTS**
- 3 **TO CONFIRM THE MINUTES OF THE MEETING HELD ON 4 SEPTEMBER 2020**

The minutes are deferred to the next Joint Overview and Scrutiny Committee.
- 4 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

5 **QUESTIONS BY THE PUBLIC**

To consider questions from and provide answers to members of the public on any matter in relation to which the Committee has powers or duties and of which due notice has been given in accordance with the Committee and Sub-Committee Procedures Rules.

6 **QUESTIONS BY COUNCILLORS**

To consider questions from and provide answers to Councillors on any matter in relation to which the Committee has powers or duties and of which due notice has been given in accordance with the Committee and Sub-Committee Procedure Rules.

7 **FORTHCOMING DECISIONS LIST**

To review the Council's Forthcoming Decisions List and identify any items to be brought before the Overview and Scrutiny Committee.

Please note the most up to date version can be found via the Website:

[FORTHCOMING DECISIONS LIST](#)

8 **JOS/19/39 SCRUTINY AND FIRST REVIEW OF THE BABERGH AND MID SUFFOLK HOUSING DELIVERY TEST ACTION PLANS (SEPARATE DOCUMENTS)** 5 - 126

9 **JOS/19/40 ANNUAL REVIEW OF THE JOINT HOMES AND HOUSING STRATEGY AND HOMELESSNESS REDUCTION AND ROUGH SLEEPING REDUCTION STRATEGY, 2019-2024** 127 - 132

10 **JOS/19/41 /BABERGH OVERVIEW AND SCRUTINY WORK PLAN** 133 - 136

To agree the Work Plan

11 **JOS/19/42 MID SUFFOLK OVERVIEW AND SCRUTINY WORK PLAN** 137 - 138

To agree the Work Plan

12 **RESOLUTION TO EXCLUDE THE PUBLIC (WHICH TERM INCLUDES THE PRESS)**

To consider, whether, pursuant to Part 1 of Schedule 12A of the Local Government Act 1972 the public be excluded from the meeting for the business specified below on the grounds that if the public were present during this item, it is likely that there would be the disclosure to them of exempt information as indicated against the item.

The authors of the report propose to be considered in Part 2 of the Agenda are satisfied that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

PART 2

MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC EXCLUDED

13 **JOS/19/42 BMSDC INDEPENDENT LIVING SERVICE - A NEW MODEL FOR DISABLED FACILITIES GRANTS** 139 - 170

Date and Time of next meeting

Please note that the next meeting is scheduled for Thursday, 19 November 2020 at 9.30 am.

Webcasting/ Live Streaming

The Webcast of the meeting will be available to view on the Councils YouTube page: https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact the Committee Officer, Henriette Holloway on: 01449 724681 Email: Committees@baberghmidsuffolk.gov.uk

Introduction to Public Meetings

Babergh/Mid Suffolk District Councils are committed to Open Government. The proceedings of this meeting are open to the public, apart from any confidential or exempt items which may have to be considered in the absence of the press and public.

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2. Follow the signs directing you to the Fire Exits at each end of the floor.
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4. Use the stairs, not the lifts.
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Agenda Item 8

BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

TO:	Babergh and Mid Suffolk Councils	REPORT NUMBER: JOS/19/40
FROM:	Cabinet Members for Planning Clive Arthey and David Burn	DATE OF MEETING: 21 September 2020
OFFICER:	Tom Barker Assistant Director Sustainable Communities	

SCRUTINY AND FIRST REVIEW OF THE BABERGH AND MID SUFFOLK HOUSING DELIVERY TEST ACTION PLANS (SEPARATE DOCUMENTS)

1. PURPOSE OF REPORT

- 1.1 These Action Plans were produced because the Government introduced the Housing Delivery Test (HDT) as a mechanism to monitor housing delivery within local areas. The HDT published in February 2019 measures net additional dwellings provided within a local authority area against the number of dwellings required and shows the performance for each local authority in England.
- 1.2 Due to the results of the HDT for September 2018, both Councils were required to publish a Housing Delivery Test Action Plan (HDTAP) within a six-month period from February 2019 (by August 2019). This requirement was addressed by a report to both Councils in June 2019 and the submitted Housing Delivery Test Action Plans were adopted by both Councils in June 2019 for publication (25th June – Babergh and 27th June – Mid Suffolk). It was understood at this time that these Action Plans would be reviewed on an annual basis both in line with the annual requirement of the Government for their production and also because it would be good practice and demonstrate “due diligence” on the part of both Councils in respect of housing delivery.
- 1.3 The results of the HDT were published in February 2020. Babergh’s performance on housing delivery in this regard was measured at 123% of the requirement and Mid Suffolk achieved 99% of the housing requirement. This meant that there was no legal requirement to publish a HDTAP for both Councils for 2020.
- 1.4 However the intention at that time, was to review the 2019 documents for progress with the first step being the scrutiny of both Council’s HDTAPs. This was planned for the 25th March 2020. However due to Covid-19, this meeting, which was scheduled to take place just after lockdown started, was cancelled. During lockdown Councillors will be aware that many housebuilders closed their construction sites to comply with Government regulations. However this situation has changed now with the re-opening of construction sites consistent with the easing of lockdown measures.
- 1.5 The purpose of this report is therefore to update those documents produced for the Overview and Scrutiny meeting planned for the 25th March 2020 and to allow Overview and Scrutiny to scrutinise current progress with the HDTAPs with a view to publishing updated HDTAPs in 2021 line with HDT timescales.

- 1.6 As part of their annual review. It is important that Joint Overview and Scrutiny is made aware of progress to date through consideration of this report and through discussion with Witnesses attending the Joint Overview and Scrutiny meeting.

2. OPTIONS CONSIDERED

- 2.1 Given the Government's requirements both in legal and timescale terms, no other options could be considered. However, the content and format of the documents were not prescriptively set by Government, although all the Government advice issued around the HDT requirement stressed the importance of basing the documents on evidence and consultation.

3. RECOMMENDATIONS

- 3.1 That the contents of this report and appendices together with verbal contributions by Witnesses to the Overview and Scrutiny Committee be noted and taken forward as part of the HDT Action Plan review (for both Councils) so that new HDTAPs produced for 2021 are informed in part by this scrutiny process.
- 3.2 The Committee may make further recommendations as it deems appropriate.

REASON FOR DECISION

To scrutinise the progress made on the separate Housing Delivery Test Action Plans for both Councils so as to inform their yearly review (to meet Government requirements) together with the objective of improving and accelerating housing delivery.

4. KEY INFORMATION

First HDTAPs produced for Babergh and Mid Suffolk in June 2019

- 4.1 As stated in paragraph 1.1 above, the first set of HDT results were published in February 2019. It identified:-
- Babergh District Council as achieving 88% of the total number of dwellings (420 per year). In addition, the HDT national results for Babergh require the addition of a 5% buffer to the figure of 420 per year.
 - Mid Suffolk District Council as achieving 81% of the total number of dwellings (556 per year). In addition, the HDT national results for Mid Suffolk require the addition of a 20% buffer to the figure of 556 per year.
- 4.2 As a consequence of not meeting the 95% requirement, the Councils were both required to publish a Housing Delivery Test Action Plan (HDTAP) within a six-month period from February 2019 (by August 2019) incorporating a range of measures that will support increased housing delivery. Appendices D and E to this report comprise the Housing Delivery Test Action Plan for Babergh 2019 (Appendix D) and Mid Suffolk 2019 (Appendix E) thereby meeting this requirement. Both Councils adopted these documents and they were published in June 2019.

4.3 The HDTAPs were produced using data and information collected from a range of data sources and documents as listed below: -

Babergh

- Babergh Stalled Sites database (June 2019) and summary
- Babergh Stalled Sites Market Intelligence report (May 2019)
- Babergh & Mid Suffolk Joint Annual Monitoring Reports 2015-2018
- Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan)
- Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024

Mid Suffolk

- Mid Suffolk Stalled Sites database (June 2019) and summary
- Mid Suffolk Stalled Sites Market Intelligence report (May 2019)
- Babergh & Mid Suffolk Joint Annual Monitoring Reports 2015-2018
- Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan)
- Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024

Methodology

4.4 Data was produced for the HDTAP focusing on major housing developments (on sites of 10 dwellings and above) and a database was constructed of all such sites where outline planning permission, reserved matters or planning permission has been granted (and is extant) but where there is no commencement. A Consultant was commissioned to provide housing market intelligence using this database focusing on sites of 10 dwellings and above whilst also looking at overall housing market intelligence and trends (including issues relating to development of sites under 10 dwellings). Data was also collected on rates of delivery from the Councils' Joint Annual Monitoring Reports from 2015-2018.

4.5 In respect of the current Joint Corporate Plan the delivery of housing is a key theme which will be delivered (in part) by new land use and planning strategies; the Joint Local Plan is central to this. In respect of housing the Joint Local Plan preferred options consultation document identifies how many homes are needed in the area and sets out the preferred spatial distribution of homes to ensure this need can be delivered. It also identifies the size, type and tenure of homes needed for the area. The new Joint Local Plan will provide certainty about growth expectations and the locations for growth. Retaining or improving the vitality of communities will be a key consideration. This objective seeks to ensure the delivery of the right types of homes, of the right tenure, in the right place, meeting need.

4.6 As part of developing the Joint Homes and Housing Strategy 2019-24, consultation took place with a wide range of stakeholders and nine themes were developed with corresponding action plans; improving the delivery of housing for both Districts is one of the nine themes. The actions from this Strategy relating to this theme are included

within this HDTAP together with detailed and general recommendations contained in the (separate) Babergh and Mid Suffolk Stalled Sites Market Intelligence reports (May 2019). These actions comprise all those listed in this Housing Delivery Test Action Plans.

Progress and Monitoring

- 4.7 It was expected that both HDTAPs would be reviewed annually (and published) and that each action will be reviewed alongside outcomes. Covid-19 interrupted the planned scrutiny for March 2020 although with many construction sites now reopened it is now considered timely to review progress of the HDTAP's ready for publication in 2021. This report allows the opportunity to scrutinise and inform that review.
- 4.8 Following both Councils' decisions to adopt both documents in June 2019:-
- An internal group of officers were identified as Workstream leads from the following teams - Strategic Planning, Development Management, Strategic Housing and Assets and Investment.
 - Each identified Workstream Lead(s) has been encouraged to take forward each action working collaboratively where necessary to achieve the objective.
 - Monthly meetings have been held to coordinate actions to keep up momentum.
 - A decision was taken to update the Consultant's high-level market intelligence report for both Districts in January 2019. Their preliminary reports for both Councils were received on the 27th April with final reports for both Councils being submitted on the 27th June 2020. With the timing of lockdown, it is clear that this intelligence was gathered and compiled pre Covid-19 lockdown. Before any publication of new HDTAPs for 2021 it would be necessary to update this data at the appropriate stage to take account of post lockdown measures.
 - The Monitoring of stalled sites continues, and this updated information will be used to inform the updated high-level market intelligence report produced by the Consultant. Appendices F and G provide an updated summary of the number of planning permissions and dwellings permitted by typology undertaken in February 2020. To assist with an understanding of the impact of lockdown measures on construction sites and housing delivery, an updated version using data on the 31st July 2020 has been compiled. This can be compared with the summary of similar data at the back of Appendices D and E (undertaken in May 2019).

Summary of progress on actions to date and outcomes

- 4.9 Each HDTAP contains 23 Actions; the majority are identical although there are some where actions are tailored to suit either Babergh or Mid Suffolk. For each action there is a workstream lead(s). These are officers taken from each of the four service areas and for some actions there are a few leads all working together collaboratively:-
- Strategic Planning

- Development Management
- Strategic Housing
- Assets and Investments

The main activities or progress for each of these areas are as follows:-

Strategic Planning

- 4.10 The main activities relate to the production of the Joint Local Plan (JLP) and a potential Affordable Housing Supplementary Planning Document (SPD). As Councillors are aware the JLP was subject to a Regulation 18 Preferred Options Public Consultation between 22nd July and 30th September 2019. A new joint Local Development Scheme (LDS) was agreed by both Councils and published in July 2020 outlining a timetable for the production of the JLP. Work has begun on identifying what would need to be included in any Affordable Housing SPD.
- 4.11 Also, under the Strategic Planning umbrella comes work related to the delivery of Infrastructure and the operation of the Community Infrastructure Levy (CIL). Specifically under action 21, a survey on CIL was carried out involving major and minor developers within both Districts. The results are contained within Appendix C to this report. The response rate to the survey was very poor so the answers are not regarded as representative. The intention was to revisit this data through a stakeholder event arranged for March 2020 required under action 19. However because of Covid 19, this event was cancelled. The current intention is to reschedule this event before the end of 2020 as a virtual meeting and to revisit the survey results on CIL. However no firm date for this virtual meeting has been set at this stage. However a key action for this meeting will be to review the HDTAPs so that proper engagement and consultation occurs before any new HDTAPs are produced for 2021.

Development Management

- 4.12 Revisions to the Local Validation List (public consultation finished on the 22nd January 2020) and amendments to the pre application charging process to ensure it is smarter and improved have taken place and as such actions 2 and 16 (ii) of the HDTAP are completed and need to be kept under review only.
- 4.13 Work continues to ensure that applications are approved on time and that legal agreements are signed off promptly. The latter together with discharging planning conditions promptly to ensure that development can commence at the earliest opportunity are part of ten actions for business improvement in Development Management that are being focused on with a Continuous Improvement Project / Service Plan. The Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has also been agreed and is live on the Councils' website.

Strategic Housing

- 4.14 As stated above, work continues on identifying what would be required in any Affordable Housing SPD. Significant work has occurred through working with Homes England and dialogue is occurring with both Councils' Registered Providers to accelerate housing delivery. Proposals are being worked up to enhance and strengthen the policy and approach to delivery of specialist and accessible housing

as we develop the next stage of the JLP. Officers are collaborating with Suffolk County Council and the other District and Borough Councils via the Suffolk Housing Board. Community Land Trust work is continuing with one scheme already delivered in Babergh (Lavenham).

Assets and Investments

- 4.15 A pipeline of development is being developed through the Assets and Investment team for Babergh and Mid Suffolk in the form of new Council houses funded from the Housing Revenue Account. Work also continues on the delivery of private homes through Council owned housing companies. These details are all set out in the HDTAPs.

Conclusions

- 4.16 Appendices A, B, and C provide the detailed monitoring information and /or completed information for activities or progress in respect of each of the actions. This is used for coordinating activities, maintaining momentum maintaining an overview on progress for the review of the HDTAPs. As stated above (in paragraph 4.8) appendices F and G comprise an updated version of the summary contained at the back of appendices D and E. These show the profile of sites and the number of planning permission that have been granted.)
- 4.17 Representatives of each of the above service areas will be in attendance so that Members of Overview and Scrutiny can ask the Witnesses about progress to date. The officers attending are:-
- Strategic Planning – Robert Hobbs and Christine Thurlow
 - Development Management – Philip Isbell
 - Strategic Housing – Heather Tucker
 - Assets and Investments – Tracey Brinkley

Outcomes and conclusions for the HDTAPs

- 4.18 Finally as Councillors will be aware the Joint Babergh and Mid Suffolk Annual Monitoring Report was published in September 2019. This document is concerned with housing delivery and can be read in full through the hyperlinks below:-
- <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-and-Mid-Suffolk-Annual-Monitoring-Report-2018-19.pdf>
- 4.19 Babergh' s Five-Year Housing Land Supply Position Statement was published in September 2019 and can be read through the following link:
- <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-District-Council-Housing-Land-Supply-Position-Statement-Sep-2019.pdf>
- 4.20 Mid Suffolk's Five-Year Housing Land Supply Position Statement was published in September 2019 and can be read through the following link:-

Housing Delivery Key facts for 2018/19

4.21 In respect of the amount of housing delivery measured by house completions for Babergh and Mid Suffolk for the year 2018-2019, the following facts are taken from the above reports.:-

- 579 new dwellings were built in Babergh District in 2019, which represents 138% of the current annual target (420 dwellings) set by the national standard methodology.
- 690 new dwellings were built in Mid Suffolk District in 2019, which represents 124% of the annual target set (556 dwellings) by the national standard methodology.
- A total of 1,269 dwellings were built across both districts during the monitoring year 2018/19.
- Babergh' s total Outstanding Planning Permissions (as at 01/04/19) = 4,513 dwellings.
- Mid Suffolk's total Outstanding Planning Permissions (as at 01/04/19) = 6,555 dwellings.
- Babergh' s Five-Year housing supply is calculated at 5.67 years.
- Mid Suffolk's Five-Year housing supply is calculated at 5.66 years

Housing Delivery Key facts for 2019/20

. 4.23 The following facts are key:-

- The annual local housing need for 2019-20 was 420 dwellings in Babergh and 556 dwellings in Mid Suffolk, (which was also published in the Joint Local Plan Preferred Options document (July 2019) as the plan requirement).
- The annual local housing need for 2020-21 as at 1st April 2020 was 416 dwellings in Babergh and 535 dwellings in Mid Suffolk. This is calculated through the Government's standard method for assessing local housing need and is a minimum figure.
- The Councils are currently producing their Joint Annual Monitoring Report (AMR) and Housing Land Supply Annual Statements. Consultation on the draft Housing Land Supply Annual Statements is expected to commence in mid-August 2020, with both these documents and the AMR being published as final documents in late September 2020.
- Given that more housing completions were achieved in both Districts than the amount required by the Housing Delivery Test 2019 (see paragraph 4.1 above), with Babergh achieving 123% and Mid Suffolk 99% of its

requirements, it is less likely that the 20% buffer required through the Housing Delivery Test if delivery is below 85% of the requirement will apply to Babergh District Council and Mid Suffolk District Council going forward for 2021.

- Examination of the summary data collected in respect of stalled sites from February (pre lockdown) compared with July 2020 allows the following conclusions to be drawn:-

For Babergh

- Number of sites under construction has increased from 20 to 24 with the number of dwellings affected rising from 1326 to 1428.
- Numbers of sites where condition discharge is occurring yet there is no start has reduced from 8 to 4 with the number of dwellings affected reducing from 680 to 63.
- Number of sites where there is no known condition discharge has risen from 13 to 15 but the amount of dwellings affected has reduced from 666 to 593.
- Number of sites where there is an outline planning permission but no detailed planning permission in place has increased from 10 to 12 with the number of dwellings affected rising from 1728 to 1870.
- There are also two development sites where condition discharge is occurring and there is a planned start on site with 457 dwellings affected.

For Mid Suffolk

- Number of sites under construction has increased from 28 to 33 with the number of dwellings affected rising from 3400 to 3607.
 - Numbers of sites where condition discharge is occurring yet there is no start has reduced from 6 to 3 with the number of dwellings affected reducing from 430 to 36.
 - Number of sites where there is no known condition discharge has risen from 16 to 19 but the amount of dwellings affected has increased from 749 to 974.
 - Number of sites where there is an outline planning permission but no detailed planning permission in place has decreased from 43 to 40 with the number of dwellings affected reducing from 2620 to 2395.
- However, this summary information which represents data capture on a snapshot in time basis will be superseded by the Joint Annual Monitoring Report (AMR) and Housing Land Supply Annual Statements when published.

5. LINKS TO JOINT CORPORATE PLAN

5.1 The current Joint Corporate Plan includes the following priority themes:

- Housing
- Economy
- Environment
- Strong and Healthy Communities

5.2 The Joint Local Plan reflects these themes by including them as objectives to be achieved (in part) through new land use and planning strategies. In particular, the Joint Local Plan will help Babergh and Mid Suffolk District Councils to achieve these key priorities.

5.3 The Housing Delivery Test Action Plans (HDTAP) underpin the housing objectives in the Joint Local Plan and have been produced in direct response to the Housing Delivery Test requirements. (see 2.1 above)

6. FINANCIAL IMPLICATIONS

BABERGH

Revenue/Capital/ Expenditure/Income Item	Total	2017/18	2018/19	2019/20	2020/21
Technical evidence (consultancy work)	£4320 (plus VAT) excluding the costs of the update report for 2020 – costs currently unknown - to be confirmed	None	None	£3,060 (plus VAT)	2019 Update costs £1260 (plus VAT) 2020 Update costs to be confirmed
Examination costs (publicity, printing, Inspector costs, Programme Officer costs)	None	None	None	None	None
Net Effect	£4320 (plus VAT)	None	None	£3,060 (plus VAT)	£1260 (plus VAT) 2020 Update costs to be confirmed

MID SUFFOLK

Revenue/Capital/ Expenditure/Income Item	Total	2017/18	2018/19	2019/20	2020/21
Technical evidence (consultancy work)	£4320 (plus VAT) excluding the costs of the update report for 2020 – costs currently unknown - to be confirmed	None	None	£3,060 (plus VAT) Update costs to be confirmed	2019 Update costs £1260 (plus VAT) 2020/21 Update costs to be confirmed
Examination costs (publicity, printing, Inspector costs, Programme Officer costs)	None	None	None	None	None
Net Effect	£4320 (plus VAT)	None	None	£3,060 (plus VAT) Update costs to be confirmed	£1260 (plus VAT) 2020/21 Update costs to be confirmed

- 6.1 The above figures represent the financial expenditure in respect of the Consultant costs for the Stalled Sites Housing Market Intelligence Reports (May 2019) and (July 2020) together with an indication of need for an updated high-level market intelligence report for both Councils. As the Brief for the update to these documents will be concluded in January 2021 with the Consultant, these figures are not able to be confirmed before the Overview and Scrutiny meeting in September 2020.
- 6.2 The Government requirement to publish both HDTAPs was met in June 2019 and there are no further consultation or Public examination costs. However, as stated elsewhere in this report, the HDTAP's will need to be implemented, reviewed and monitored with a further updated versions being produced in 2021. Expenditure for this original work came from the Local Plan budget; the costs were relatively small and the consultancy work came in under budget. Savings were made by data collection and formulation of this HDTAP using existing resources. Going forward the costs for an updated report for both Councils are also expected to be minimal with savings being made as before using data collection and existing resources.

7. LEGAL IMPLICATIONS

- 7.1 The Housing Delivery Test set out the Councils requirements with regard to the publication of a HDTAP within six months from the publication of the HDT (in February 2019; thereby the HDTAPs had to be published before August 2019.
- 7.2 Both Councils adopted and published an HDTAP in June 2019 thereby meeting the Governments requirement.
- 7.3 Both Councils are fully committed to keeping this under review and scrutinising progress such that the documents (and therefore the actions) are as effective as they can be to improve and accelerate housing delivery in both Districts.

8. RISK MANAGEMENT

- 8.1 This report impacts upon the following Corporate / Significant Business Risks:-
- 1c (not being able to meet the Governments Housing Delivery Test)
- 8.2 Other key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
Disagreement to endorse the proposed publication of this HDTAP	Unlikely (2) Lead Councillors have been engaged with consultation stages of the Joint Homes and Housing Strategy on which (in part) this HDTAP is based	Serious (3) – would not meet the HDT timescale requirement to deliver a HDTAP within the specified period	Stakeholder engagement together with housing market intelligence report which has examined the Districts housing delivery and the issues arising

9. CONSULTATIONS

- 9.1 Consultation occurred through stakeholder engagement during the development of the Joint Homes and Housing Strategy 2019-24; this included Cabinet Leads for Housing and the Council Leaders together with developers, land agents, estate agents and key local people involved in housing delivery. In addition, the Councils appointed a local Consultant skilled in housing delivery to provide key information in relation to housing market intelligence together using local data from the Councils' database.
- 9.2 Officers will continue to work closely with stakeholders in any implementation monitoring and review work of these HDTAPs.

10. EQUALITY ANALYSIS

- 10.1 An Equality Impact Assessment (EIA) is not required for this document as one has been written to support the Joint Local Plan.

11. ENVIRONMENTAL IMPLICATIONS

- 11.1 Housing delivery is key to the production of a HDTAP and the impact on the environment is fully taken into account and considered as part of the plan making and decision taking part of the planning processes. As such there is no need for an EIA in respect of this specific document.

12. APPENDICES

Title	Location
(A) Babergh Housing Delivery Test Action Plan June 2019 Progress Monitoring	Attached
(B) Mid Suffolk Housing Delivery Test Action Plan June 2019 progress Monitoring	Attached
(C) Results of the October 2019 CIL Survey	Attached
(D) Housing Delivery Test Action Plan June 2019 Babergh District Council	Attached
(E) Housing Delivery Test Action Plan June 2019 Mid Suffolk District Council	Attached
(F) Updated summary of the number of planning permissions and dwellings permitted by typology (February 2020 and July 2020) Babergh District Council	Attached
(G) Updated summary of the number of planning permissions and dwellings permitted by typology (February 2020 and July 2020) Mid Suffolk District Council	Attached

13. BACKGROUND DOCUMENTS

- 13.1 Babergh and Mid Suffolk Stalled Sites database (June 2019) and summaries - (Separate documents)
- 13.2 Babergh and Mid Suffolk Stalled Sites Market Intelligence reports (May 2019 and July 2020) – (Separate documents)

- 13.3 Babergh and Mid Suffolk Joint Annual Monitoring Reports 2015-2019
- 13.4 Joint Corporate Plan
- 13.5 Homes and Housing Strategy 2019-2024 and Homelessness Reduction and Rough Sleeper Strategy 2019-24
- 13.6 Equality Impact Assessment prepared for the Joint Local Plan
- 13.7 Babergh and Mid Suffolk's Joint Annual Monitoring Report published in September 2019
- 13.8 Babergh and Mid Suffolk's (separate) Five-year Housing Land Supply Position Statement
- 13.9 Babergh Housing Delivery Test Action Plan (June 2019) and Mid Suffolk Housing Delivery Test Actions Plan (June 2019)
- 13.10 Housing Market Intelligence report for Babergh and Mid Suffolk (separate documents) – (May 2019) and (July 2020)

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APPENDIX A. Housing Delivery Test Action Plan (Babergh) – July 2020.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
1	Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.	Providing clarity and certainty through the provision of a Joint Local Plan comprising development policies including those providing for land allocations together with a sound and evidenced Infrastructure Delivery Plan.	Work in progress.	Public consultation on of the emerging Joint Local Plan Regulation 18 was carried out during the Summer 2019 (from 22/07/2019 to 30/09/2019). Infrastructure Delivery Plan (July 2019) published for start of the JLP consultation on 22/07/2019.	The updated Local Development Scheme which includes the revised timetable for the Joint Local Plan is being presented to Babergh Council on 21/07/2020 and Mid Suffolk Council 23/07/2020. The Infrastructure Delivery Plan is being updated as part of the evidence base documents to accompany the Joint Local Plan in readiness for	Elizabeth Thomas and Anik Bennett	Regulation 18 draft of the Joint Local Plan consultation period ended 30 th Sept 2019. All submitted comments analysed and policies being updated/reviewed. Joint Local Plan now progressing to next round of formal consultation. Local Development Scheme agreed and published for both Councils - July 2020 Infrastructure Delivery Plan being reviewed and updated in parallel and in preparation of the evidence needed for the next stage of the Joint Local Plan.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					the next public consultation.		
2	Ensuring a smarter and improved pre-application process.	Getting our pre-application process right first time such that application decision is consistent with pre application advice.	New revised scheme in place and being monitored.	Presentation of report to both Councils Cabinet in respect of revisions to existing scheme in March 2019. Continued monitoring subsequently to ensure that scheme is effective.	Original scheme amended March 2019. Delegated powers agreed for minor changes. New pre-response format being drafted, to provide more clarity for customers.	Gemma Walker	Pre-app format has been amended, tested and reviewed and is now in use. Work on-going to review overall pre-application service including updated guidance, training, and charging review.
3	Ensuring applications are approved on time and Section 106 agreements are signed off promptly.	No delay to planning application determination.	Work in progress.	Ongoing and publication of statistics to confirm performance and outcomes.	[a] Review of Section 106 procedures and opportunities to develop Uniform now included in Planning Service Continuous Improvement	Philip Isbell	Please see Progress column, points a, b and c. On-going progress: a) On-going. b) In hand. c) In place and happening. All 3 actions are part of the 10 actions on

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					<p>Projects for 2019/2020.</p> <p>[b] Review of planning officer instructions to legal in progress JW/CF. Will feed into [a].</p> <p>[c] Monthly progress review meetings diarised with West Suffolk Legal.</p>		<p>Continuous Improvement Project / Service Plan, taking place over next 6 to 9 months.</p> <p>Mark Russel picking up project. S106 aligned for more cohesive process – ongoing.</p> <p>RAMS Section 111 form is “live” and on our website.</p>
4	Discharging planning conditions promptly to ensure development can commence.	No delays in the discharge of planning conditions.	Action Plan to be devised agreed and implemented to achieve outcome.	Ongoing and active monitoring in place but action plan needed given feedback to the Consultant for the Housing Delivery Action Plan/Unblocking stalled site project to	Conditions Action Plan being drafted and under discussion. Potential to develop Planning Performance Agreement (PPA) model for conditions.	Julie Havard	<p>Implementing this module has been reassigned to Continuous Improvement Project (CIP) Project 7. Due to prioritising the Planning Enforcement Transformation this has been delayed to Q3/Q4</p> <p>We are continuing to proactively manage the discharge of condition process and are looking</p>

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				achieve desired outcome.	<p>Exploring opportunity to develop Conditions module in Uniform and look for best practice elsewhere.</p> <p>Stricter validation of Discharge Of Condition applications to highlight missing information at the beginning of the process, avoiding delays and multiple consultations to Technical Consultees</p>		<p>to train an additional staff member to assist.</p> <p>Additional guidance for agents/applicants on tracking and addressing any issues on Discharge Of Condition applications is drafted. To be added to acknowledgement letters and planning pages of the website by end August</p> <p>Although some applications may take longer than the prescribed 8 weeks it is a result of negotiations with agents/applicants rather than delays on the part of the Planning Team</p>
5	Viability testing of proposed land allocations at plan making stage.	Appointment of Consultants who are reviewing the draft charging	Work in progress.	To meet the Joint Local Plan and Infrastructure Delivery Plan	First stage Viability testing was published as evidence for the Regulation 18	Elizabeth Thomas	The next iteration of the viability study was commissioned in early January 2020 and work is

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		regime for Community Infrastructure Levy (CIL) together with the Infrastructure requirements of each land allocations to ensure that all site allocations are viable and therefore deliverable.		timetable as set out above.	draft Joint Local Plan consultation of the summer 2019. Will be revisited following public consultation stage.		in hand and will help to inform deliverability. Second stage viability testing underway, preferred sites of the Joint Local Plan being assessed together with policies and infrastructure. Awaiting outcome together with pathway for revision of CIL Charging Schedule (as set-out in proposed reviewed Local Development Scheme).
6	Reviewing stalled sites to ensure blockages and delays to development are resolved.	Development of a database and an approach to unblocking stalled sites. Production of a report which outlines intelligence around the housing market which will provide a	Work in progress.	Project work commenced with an amended Brief in December 2018 and with a completion date of end of May/ early June 2019.	Housing Delivery Test Action Plan completed June 2019. Unblocking stalled sites work from the database continues.	Christine Thurlow	Unblocking stalled sites work from the database is ongoing with regular monthly monitoring. Monitoring has also occurred for Covid-19 impacts regarding CIL, with 3 months deferrals which ended at the end of June 2020. High Level market intelligence report for

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		foundation for the Strategy and which will comprise the Councils Housing Delivery Test Action Plans.					both Councils was updated in July 2020 (using data prior to Covid-19).
7	Creating a flexible approach to tenure mix to accelerate delivery.	Potential production and adoption of Affordable Housing SPD linked to adoption of Joint Local Plan. Inclusive of guidance on Community-led housing, and specialist housing provision.	Action Plan required.	Timetable dependent upon progress of the JLP. To be reviewed when JLP timescale confirmed.	Started looking at latest good practise and local examples of current SPD's .	Elizabeth Thomas and Robert Feakes	A potential Supplementary Planning Document (SPD) is being considered, which will set out in detail our approach to and expectations of affordable housing provisions and contributions.
8	Developing new private homes through Council	A programme to deliver 414 homes for the	Work in progress.	3-5 year rolling programme has been devised for	Planning permission granted for both	Tracey Brinkley	The BDC HQ site which will provide 57 Open Market units and remains

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	owned housing companies.	Councils' own affordable homes programme has been devised.		affordable homes.	HQ buildings. 57 dwellings at Hadleigh HQ. Joint venture partnership between Babergh Growth and Suffolk Norse.		as designed. Norse are liaising with the Cricket Club to agree an amicable solution for the ball strike mitigation. Discussions have been constructive to-date and are nearing resolution, which in turn will release the S106 agreement, and thus planning permission.
9	Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.	Ensure the delivery of the Affordable Homes Programme has the resources to deliver at speed. Aim to maximise the level of grants from various pots to ensure that the homes can be subsidised and therefore let at	Action Plan in place.	3-5 year rolling programme has been devised.	Planning permission granted for all NB schemes. Angel Court 21 units SOS 16.3.20. Comp due April 2021 Brantham 9 units, and Shotley 8 units, contract let to DCH, SOS Aug 2020	Tracey Brinkley	Other schemes at pre-app or feasibility stage. Delivery of Affordable units – target 214 units, since 2017 – 93 units added to our stock – (27 new build) and have 158 in the current programme (41 new build and 117 S106 offers accepted or in contract).

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		an affordable /social rent. We will maximise the use of our own land/assets. We will engage with planners and consultants at an early stage to help increase the speed of delivery.			Cockfield 3 units in partnership with Orwell HA and SHE French const.		
10	Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.	Strategic Housing Team will liaise regularly with Homes England to maximise Affordable Housing Programme investment into	Action plan required.	Obtain figures for each financial year and summarise at the end of each Homes England funding programme to Members. Apply for Community Housing Fund	Action Plan to be started in line with policy work in JLP.	Robert Feakes	Rural Exception Sites, ongoing program of work with a number of Parish Councils who are at different stages in the planning of Rural Exception Sites. Also refer to action 14 for other rural housing activity.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		both Council areas.		prior to December 2019.			<p>Council land assets to focus on areas of highest needs to meet rural needs.</p> <p>Link to CLT work and Housing Needs surveys. Some Rural Exceptions (in Babergh: Groton, Stutton and Newton – with HASTOE) rural schemes coming forward.</p>
11	Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.	Increase supply and delivery against assessed needs. Identification of needs data will assist in attracting delivery partners to provide a purpose-built scheme.	Action Plan required.	Plan for specific needs on a 3-year rolling programme in conjunction with commissioning partners.	Discussions with ACS within SCC to look at data available to influence the JLP policy, Suffolk Housing Board agreed on 10/9/2019 to write a Vulnerable Groups housing Strategy for Suffolk. No timescale yet for end date.	Elizabeth Thomas and Robert Feakes	<p>The Regulation 18 draft Joint Local Plan includes policies to encourage and enable the delivery of supported and specialist accessible housing.</p> <p>Consultation feedback has been reviewed and officers are working to enhance the evidence we hold to underpin these policies, as we develop the next draft of the JLP ready for consultation.</p>

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							<p>Officers are also collaborating with the County Council and the other District and Borough Councils via the Suffolk Housing Board. However, the pandemic has meant that progress on cross-Suffolk work to create a detailed assessment of specialist housing need has been delayed.</p> <p>Draft policy prepared, on-going work on evidence base.</p>
12	Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.	Investigate using these powers as part of the Strategy for unblocking stalled sites where circumstances dictate that this is an	Work to be competed when appropriate and needed on a case by case basis.	Not a 'fixed' time piece of work. Circumstances of each case would determine whether there is a need to investigate further, consider use of Compulsory Purchase Order	No activity at this time as best way to approach this work is on a site by site basis.	Christine Thurlow	N/A as no sites require this activity at this time (as per Progress column).

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		appropriate measure.		powers, then instigate and monitor. Ongoing.			
13	Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).	Better engagement with Homes England should re-assure them of our councils' ambitions with regards to our own direct delivery. By giving confidence of delivery we are more likely to receive grant funding. By being clear on our programme and borrowing requirements gives the Development Team the chance to	Work in progress.	Ongoing.	Homes England relationship established – have been awarded and in contract for £855,000 of grant for Angel Court and awarded grant for Brantham of £630,000 and for Shotley for £560,000.	Christine Thurlow / Robert Feakes / Tracey Brinkley	In two ways 1) Ongoing relationship with Homes England on a site by site basis for funding for specific schemes. Where required this has involved discussions working in partnership with developers to gain funds to forward fund infrastructure. 2) Regular engagement with Homes England to look at strategic aims and objectives for housing delivery. Meetings with Homes England expected twice a year. Seeking grant support on new built schemes

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		respond to opportunities available at short notice from developers.					(please see Progress column).
14	Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts (CLT).	Continue to use the Community Housing Fund allocation from 2017 to support our communities to develop community-led housing initiatives. We will ensure the JLP includes policies which favours community-led housing. We will assist community groups to make applications to	Work in progress.	By the end of 2020/21 to have successfully funded the setting up of additional CLT's across the two districts.	Continued engagement with National CLT Network, Locality and with our local communities.	Robert Feakes	Community Land Trusts (CLTs) set up in Babergh: East Bergholt and Lavenham. Lavenham first scheme completed example of good collaboration. Awaiting to hear in the Comprehensive Spending Review from Central Government at the end of September 2020if additional funding will still be provided by Homes England for CLTs.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		Homes England for Community Housing Fund grant in 2019.					
15	Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.	To secure good working relationships with new partners to secure more certainty around affordable housing delivery. Encourage all partners to invest in our communities and secure new schemes.	Action Plan required.	By December 2019 for feasibility work. April 2020 to secure two suitable sites for pilot schemes.	Ensuring S106 agreements include a clause whereby capital receipts from Staircasing purchases over 80% equity are retained for re-investment in LA area.	Robert Feakes	Two pilot schemes anticipated but dependent on successful bids for developers. Meetings continue with all Registered Providers (RPs); this includes "for profit" RPs. Link to action 23. Sage HA and Legal and General Pension Investment. Rent Plus pilot scheme agreed with them (49 units). One more scheme to be built SME.
16	Early Stallers (i) Engage regularly with the	Focused engagement, enhanced processes and	Action Plan to implement this measure	Prior to the annual review of this Housing	Fixed term (6 months) G4 position to assist with this task (to	Action 1 - Steven Stroud	1.Fixed term (12 months) G3 support role to be appointed in new year.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	<p>site promoters of “early staller sites”.</p> <p>(ii) Secure memorandums of understanding on deliverability.</p> <p>(iii) Update Local List of information required to support a planning application.</p>	monitoring to achieve improved housing delivery.	will be required.	Delivery Test Action Plan.	<p>be shortly appointed).</p> <p>Ongoing discussions continue to be had with major delivery partners and SCG on deliverability (it was advised to all some time ago that MoU was no longer appropriate) continue to come forward as sites are transacted.</p> <p>Local Validation List is currently nearing the end of the 6 week consultation period (22/1/20).</p>	<p>Action 2 - Steven Stroud</p> <p>Action 3 – John Pateman-Gee</p>	<p>Post in place, re-advertising.</p> <p>2. Latest SCG agreed December 2019.</p> <p>3. Local Validation List has been revised, this will be on-going as awaiting Central Government changes to planning process.</p>
17	Condition stallers	Focused processes to achieve improved	Action Plan to implement this measure	Prior to the annual review of this Housing	Create spreadsheet using standard conditions in	Julie Havard	Not all conditions are worded in a way where the actual information required is obvious JH

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	(i) Provide a checklist and a sample of “model” information for different conditions.	housing delivery.	will be required.	Delivery Test Action Plan.	Uniform (JM) Ask consultees to provide guidance on expected information to be submitted by applicants for each condition. (JEH)		working with consultees to create clear instructions for applicants/agents as to the level of detail required. All conditions to be reviewed with associated guidance by end of Quarter 4 which is by July 2020. This has been started, revisions have been made to Ecology and Flood conditions further work is required, new completion date is end Sept 2020
18	Late stallers (i) Continue to monitor build out of sites. (ii) Engage with developers of all sites with planning permission where there is only 12	Focused engagement processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Action 1 a) - Crystal reports on site build out drawing on DM and Building Control databases being developed. Action 1 b) - Uniform	Action 1 a) and b) - John Mawdsley and Anik Bennett	Action 1 a) and b) - Reports have been written. Action 2 – Discussions are ongoing with major developers/housebuilders as to whether an alternative to Client-side

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	months to run before the permission expires.				(Enterprise) alert to be developed. Staff tasking under review. Action 2 - Alternative to Client-Side Panel (which will continue to function) to be set up and which will cater specifically for housebuilders.	Action 2 - Steven Stroud and John Mawdsley	panel would be beneficial. In place, 2 forum approach established.
19	Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on	Improved engagement with an opportunity to share information on issues with the planning process, the current state of the market and important updates on	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Arrangements being planned for annual key market engagement event with Major developers – circa December 2019.	Christine Thurlow, Robert Feakes and Philip Isbell	Please see Progress column. Response from Development Management – Client-Side Panel continues to run on a quarterly basis inviting a broad range of stakeholders. March 2020 workshop event (for smaller housebuilders and large

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	before being built out).	policy approaches.					developers around housing delivery) was cancelled due to Covid-19. Virtual meeting to be considered and discussed with the Leads.
20	Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships.	Improved engagement which could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Client Side Panel already established for all developers and agents. Establishment of Major developer client side group under discussion. Potentially to sequence after 19.	Steven Stroud	Please see Progress column. Continuing to work with developers much earlier in the process through Pre-App and PPA (Planning Performance Agreements). Local Validation List to now include Statements of Delivery with application submission. Client-side panel continues to run on a quarterly basis. Also links with Action 18.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		both parties at different stages of the application process.					
21	Undertake a survey of key market stakeholders on attitudes to CIL, particularly among major site promoters. In particular, this should seek to understand what impact the CIL charge is having.	Better engagement and an opportunity to consider responses as part of the current CIL Review.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan and as part of the current CIL Review which is occurring alongside the Joint Local Plan.	Survey drafted and being set up as digital "Smart Survey" to be issued to stakeholders.	Christine Thurlow	Digital survey carried out and completed in October 2019. Survey sent out to 25 Major and minor developers. Only one response received. Analysis forms Appendix B to the report for Overview and Scrutiny. Workshop event (cancelled in March 2020) and likely to be replaced by a virtual meeting was due to include an update of the survey with developers. Looking to carry out survey at virtual meeting.
22	As part of the engagement process with stakeholder gain further detailed	Better engagement and an opportunity to consider	Action Plan to implement this measure	Prior to the annual review of this Housing	Arrangements being planned for annual key market engagement	Christine Thurlow, Robert	March 2020 workshop event (for smaller housebuilders and large developers around housing delivery) was

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	information about how the planning process (and any delays perceived or real) affects decisions over land options.	responses as part of the Review to this Housing Delivery Test Action Plan.	will be required.	Delivery Test Action Plan.	event with Major developers – circa December 2019	Feakes and Philip Isbell	cancelled due to Covid-19. Virtual meeting to be considered and discussed with the Leads. Stakeholder events, and engagements to be coordinated as these could be linked to the Development Management Client Side Panel events held every quarter, possibly with the developer's groups.
23	More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that	Better engagement to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Aim to provide quarterly updates of where Outline applications have been granted to RP's and in-house development team.	Robert Feakes and Tracey Brinkley	This action relates to engagement with Housing Associations and the BMSDC housing development team, following grant of outline planning permissions. TB working with RF to receive info on potential S106 opportunities. Number of S106 opportunities coming to us, bids made

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	would otherwise be purchasing and taking forward those sites).						<p>and successful acquisitions increased significantly.</p> <p>To be done quarterly, aim to start in January 2020 more formally.</p> <p>RF, TB, and teams have met with RPs pre Covid-19. Two of the RPs have merged.</p>

APPENDIX B. Housing Delivery Test Action Plan (Mid Suffolk). – July 2020.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
1	Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.	Providing clarity and certainty through the provision of a Joint Local Plan comprising development policies including those providing for land allocations together with a sound and evidenced Infrastructure Delivery Plan.	Work in progress.	Public consultation on of the emerging Joint Local Plan Regulation 18 was carried out during the Summer 2019 (from 22/07/2019 to 30/09/2019). Infrastructure Delivery Plan (July 2019) published for start of the JLP consultation on 22/07/2019.	The updated Local Development Scheme which includes the revised timetable for the Joint Local Plan is being presented to Babergh Council on 21/07/2020 and Mid Suffolk Council 23/07/2020. The Infrastructure Delivery Plan is being updated as part of the evidence base documents to accompany the Joint Local Plan in readiness for the next public consultation.	Elizabeth Thomas and Anik Bennett	Regulation 18 draft of the Joint Local Plan consultation period ended 30 th Sept 2019. All submitted comments analysed and policies being updated/reviewed. Joint Local Plan now progressing to next round of formal consultation. Local Development Scheme agreed and published for both Councils - July 2020 Infrastructure Delivery Plan being reviewed in parallel and in preparation of the evidence needed for the next stage of the Joint Local Plan.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
2	Ensuring a smarter and improved pre-application process.	Getting our pre-application process right first time such that application decision is consistent with pre application advice.	New revised scheme in place and being monitored.	Presentation of report to both Councils Cabinet in respect of revisions to existing scheme in March 2019. Continued monitoring subsequently to ensure that scheme is effective.	Original scheme amended March 2019. Delegated powers agreed for minor changes. New pre-response format being drafted, to provide more clarity for customers.	Gemma Walker	Pre-app format has been amended, tested and reviewed and is now in use. Work on-going to review overall pre-application service including updated guidance, training, and charging review.
3	Ensuring applications are approved on time and Section 106 agreements are signed off promptly.	No delay to planning application determination.	Work in progress.	Ongoing and publication of statistics to confirm performance and outcomes.	[a] Review of Section 106 procedures and opportunities to develop Uniform now included in Planning Service Continuous Improvement Projects for 2019/2020. [b] Review of planning officer	Philip Isbell	Please see Progress column, points a, b and c. On-going progress: a) On-going. b) In hand. c) In place and happening. All 3 actions are part of the 10 actions on Continuous Improvement Project / Service Plan,

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					<p>instructions to legal in progress JW/CF. Will feed into [a].</p> <p>[c] Monthly progress review meetings diarised with West Suffolk Legal</p>		<p>taking place over next 6 to 9 months.</p> <p>Mark Russel picking up project. S106 aligned for more cohesive process – ongoing.</p> <p>RAMS Section 111 form is “live” and on our website.</p>
4	Discharging planning conditions promptly to ensure development can commence.	No delays in the discharge of planning conditions.	Action Plan to be devised agreed and implemented to achieve outcome.	Ongoing and active monitoring in place but action plan needed given feedback to the Consultant for the Housing Delivery Action Plan/Unblocking stalled site project to achieve desired outcome.	<p>Conditions Action Plan being drafted and under discussion. Potential to develop Planning Performance Agreement (PPA) model for conditions.</p> <p>Exploring opportunity to develop Conditions module in Uniform and look for best</p>	Julie Havard	<p>Implementing this module has been reassigned to Continuous Improvement Project (CIP) Project 7. Due to prioritising the Planning Enforcement Transformation this has been delayed to Q3/Q4</p> <p>We are continuing to proactively manage the discharge of condition process and are looking to train an additional staff member to assist.</p> <p>Additional guidance for agents/applicants on tracking and addressing</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					<p>practice elsewhere.</p> <p>Stricter validation of Discharge Of Condition applications to highlight missing information at the beginning of the process, avoiding delays and multiple consultations to Technical Consultees</p>		<p>any issues on Discharge Of Conditions applications is drafted. To be added to acknowledgement letters and planning pages of the website by end August</p> <p>Although some applications may take longer than the prescribed 8 weeks it is a result of negotiations with agents/applicants rather than delays on the part of the Planning Team</p>
5	Viability testing of proposed land allocations at plan making stage.	Appointment of Consultants who are reviewing the draft charging regime for Community Infrastructure Levy (CIL) together with	Work in progress.	To meet the Joint Local Plan and Infrastructure Delivery Plan timetable as set out above.	First stage Viability testing was published as evidence for the Regulation 18 draft Joint Local Plan consultation of the summer 2019.	Elizabeth Thomas	<p>The next iteration of the viability study was commissioned in early January 2020 and is in hand and will help inform deliverability.</p> <p>Second stage viability testing underway, preferred sites of the</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		the Infrastructure requirements of each land allocations to ensure that all site allocations are viable and therefore deliverable.			Will be revisited following public consultation stage.		Joint Local Plan being assessed together with policies and infrastructure. Awaiting outcome together with pathway for revision of CIL Charging Schedule (as set-out in proposed reviewed Local Development Scheme).
6	Reviewing stalled sites to ensure blockages and delays to development are resolved.	Development of a database and an approach to unblocking stalled sites. Production of a report which outlines intelligence around the housing market which will provide a foundation for the Strategy and which will comprise the Councils	Work in progress.	Project work commenced with an amended Brief in December 2018 and with a completion date of end of May/ early June 2019.	Housing Delivery Test Action Plan completed June 2019. Unblocking stalled sites work from the database continues.	Christine Thurlow	Unblocking stalled sites work from the database is ongoing with regular monthly monitoring. Monitoring has also occurred for Covid-19 impacts regarding CIL, with 3 months deferrals which ended at the end of June 2020. High Level market intelligence report for both Councils was updated in July 2020 (using data prior to Covid-19).

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		Housing Delivery Test Action Plans.					
7	Creating a flexible approach to tenure mix to accelerate delivery.	Potential production and adoption of Affordable Housing SPD linked to adoption of Joint Local Plan. Inclusive of guidance on Community-led housing, and specialist housing provision.	Action Plan required.	Timetable dependent upon progress of the JLP. To be reviewed when JLP timescale confirmed.	Started looking at latest good practise and local examples of current SPD's..	Robert Feakes Elizabeth Thomas and Robert Feakes	A potential Supplementary Planning Document (SPD) is being considered, which will set out in detail our approach to and expectations of affordable housing provisions and contributions.
8	Developing new private homes through Council owned housing companies.	A programme to deliver 414 homes for the Councils' own affordable homes programme	Work in progress.	3-5 year rolling programme has been devised for affordable homes.	Planning permission now granted for both HQ buildings. 84 open market homes at Needham HQ Joint venture	Tracey Brinkley	MSDC HQ site [known as Chambers Green] Total of 94 units – incl 10 affordable. Enabling Works commencing imminently on Phase 1 which will provide 32 nr dwellings, of which 10

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		has been devised. .			partnership between Mid Suffolk Growth and Suffolk Norse.		are affordable, together with a ground floor retail unit. The main works anticipated to commence in Autumn. Cocksedge Building Contractors Limited have been appointed to design and construct Phase 1. The design of Phase 2 is under way and the team are liaising with the Planners.
9	Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.	Ensure the delivery of the Affordable Homes Programme has the resources to deliver at speed. Aim to maximise the level of grants from various pots to ensure that the homes can be	Action Plan in place.	3-5 year rolling programme has been devised.	Needham Mkt Middle school – 41 units. Contract let to Gipping Const, SOS due Sept 2020 Community Education Centre, Stowmarket 4 units – planning permission in place, will be part	Tracey Brinkley (to remain lead)	Planning permissions granted as per column on Progress. Other schemes at pre-app or feasibility stage. Delivery of Affordable units – target 200 units in MSDC, since Apr 2017 – 65 units added to our stock with 29 being New Build. We have 207 in the current programme (83 new build and 124 S106

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
		subsidised and therefore let at an affordable /social rent. We will maximise the use of our own land/assets. We will engage with planners and consultants at an early stage to help increase the speed of delivery.			of SMS const contract Stowmarket Middle school – planning app for 44 units, still awaiting completion of S106 and Decision Notice to be issued. I. Tender issued Paddock House, Eye 16 units, planning application in.		offers accepted or in contract) New build all due to start on site this financial year 2020/21.
10	Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards,	Strategic Housing Team will liaise regularly with Homes England to maximise Affordable Housing Programme investment into	Action plan required.	Obtain figures for each financial year and summarise at the end of each Homes England funding programme to Members. Apply for Community Housing Fund	Action Plan to be started in line with policy work in JLP.	Robert Feakes	Rural Exception Sites, ongoing program of work with a number of Parish Councils who are at different stages in the planning of Rural Exception Sites. Also refer to action 14 for other rural housing activity.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	accessibility standards.	both Council areas.		prior to December 2019.			Council land assets to focus on areas of highest needs to meet rural needs. Link to CLT work and Housing Needs surveys.
11	Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.	Increase supply and delivery against assessed needs. Identification of needs data will assist in attracting delivery partners to provide a purpose-built scheme.	Action Plan required.	Plan for specific needs on a 3-year rolling programme in conjunction with commissioning partners.	Discussions with ACS within SCC to look at data available to influence the JLP policy, Suffolk Housing Board agreed on 10/9/2019 to write a Vulnerable Groups housing Strategy for Suffolk. No timescale yet for end date.	Robert Feakes Elizabeth Thomas and Robert Feakes	The Regulation 18 draft Joint Local Plan includes policies to encourage and enable the delivery of supported and specialist accessible housing. Consultation feedback has been reviewed and officers are working to enhance the evidence we hold to underpin these policies , as we develop the next draft of the JLP ready for consultation. Officers are collaborating with the County Council and the other District and Borough Councils via the Suffolk Housing Board.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
							However, the pandemic has meant that progress on cross-Suffolk work to create a detailed assessment of specialist housing need has been delayed.
12	Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.	Investigate using these powers as part of the Strategy for unblocking stalled sites where circumstances dictate that this is an appropriate measure.	Work to be competed when appropriate and needed on a case by case basis.	Not a 'fixed' time piece of work. Circumstances of each case would determine whether there is a need to investigate and /or further, consider use of Compulsory Purchase Order powers, then instigate and monitor. Ongoing.	No activity at this time as best way to approach this work is on a site by site basis as no sites require this activity.	Christine Thurlow	N/A as no sites require this activity at this time. (as per Progress column).
13	Creating a stronger relationship with	Better engagement with Homes	Work in progress.	Ongoing.	Homes England relationship established –	Christine Thurlow / Robert	In two ways

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).	England should re-assure them of our councils' ambitions with regards to our own direct delivery. By giving confidence of delivery we are more likely to receive grant funding. By being clear on our programme and borrowing requirements gives the Development Team the chance to respond to opportunities available at short notice from developers.			have been awarded and in contract for £1,420,000 of grant for NMMS.	Feakes / Tracey Brinkley	<p>1) Ongoing relationship with Homes England on a site by site basis for funding for specific schemes. Where required this has involved discussions working in partnership with developers to gain funds to forward fund infrastructure.</p> <p>2) Regular engagement with Homes England to look at strategic aims and objectives for housing delivery. Meetings with Homes England expected twice a year.</p> <p>Specifically, a Bid to be made for SMS for £1,190,000.</p> <p>Seeking grant support on new built schemes (please see Progress column).</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
14	Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts (CLT).	Continue to use the Community Housing Fund allocation from 2017 to support our communities to develop community-led housing initiatives. We will ensure the JLP includes policies which favours community-led housing. We will assist community groups to make applications to Homes England for Community Housing Fund grant in 2019.	Work in progress.	By the end of 2020/21 to have successfully funded the setting up of additional CLT's across the two districts.	Continued engagement with National CLT Network and with our local communities.	Robert Feakes	Community Land Trusts (CLTs) set up in Mid Suffolk: Stradbroke (now a legal entity), Eye (not legal entities yet), Elmswell (not legal entities yet), Laxfield (now a legal entity) and Mendlesham (now a legal entity) Awaiting to hear in the Comprehensive Spending Review from Central Government at the end of September 2020if additional funding will still be provided by Homes England for CLTs.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
15	Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.	To secure good working relationships with new partners to secure more certainty around affordable housing delivery. Encourage all partners to invest in our communities and secure new schemes.	Action Plan required.	By December 2019 for feasibility work. April 2020 to secure two suitable sites for pilot schemes.	Ensuring S106 agreements include a clause whereby capital receipts from Staircasing purchases over 80% equity are retained for re-investment in LA area.	Robert Feakes	Two pilot schemes anticipated but dependent on successful bids for developers. Meetings continue with all Registered Providers (RPs); this includes “for profit” RPs.
16	Early Stallers (i) Engage regularly with the site promoters of “early staller sites”. (ii) Secure memorandums of	Focused engagement, enhanced processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Fixed term (6 months) G4 position to assist with this task (to be shortly appointed). Ongoing discussions continue to be had with major delivery partners and SCG	Action 1 - Steven Stroud Action 2 - Steven Stroud	1.Fixed term (12 months) Grade 3 support role to be appointed in new year. Post in place, re-advertising. 2.Latest SCG agreed December 2019.

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	<p>understanding on deliverability.</p> <p>(iii) Update Local List of information required to support a planning application.</p>				<p>on deliverability (it was advised to all some time ago that Memo of Understanding was no longer appropriate) continue to come forward as sites are transacted.</p> <p>Local Validation List is currently nearing the end of the 6 week consultation period (22/1/20).</p>	Action 3 – John Pateman-Gee.	3. Local Validation List has been revised; this will be on-going as awaiting Central Government changes to planning process.
17	<p>Condition stallers</p> <p>(i) Provide a checklist and a sample of “model” information for different conditions.</p>	Focused processes to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Create spreadsheet using standard conditions in Uniform (JM) Ask consultees to provide guidance on expected information to be submitted by applicants for	Julie Havard	Not all conditions are worded in a way where the actual information required is obvious JH working with consultees to create clear instructions for applicants/agents as to the level of detail required. All conditions to be reviewed with associated guidance by

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					each condition. (JEH)		end of Quarter 4 which is by July 2020. This has been started, revisions have been made to Ecology and Flood conditions further work is required, new completion date is end Sept 2020
18	<p>Late stallers</p> <p>(i) Continue to monitor build out of sites.</p> <p>(ii) Engage with developers of all sites with planning permission where there is only 12 months to run before the permission expires.</p>	Focused engagement processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	<p>Action 1 a) - Crystal reports on site build out drawing on DM and Building Control databases being developed.</p> <p>Action 1 b) - Uniform (Enterprise) alert to be developed. Staff tasking under review.</p> <p>Action 2 - Alternative to Client-Side Panel (which will</p>	<p>Action 1 a) and b) - John Mawdsley and Anik Bennett</p> <p>Action 2 - Steven Stroud and</p>	<p>Action 1 a) and b) - Reports have been written.</p> <p>Action 2 - Discussions are ongoing with major developers/housebuilders as to whether an alternative to Client -side panel would be beneficial.</p> <p>In place, 2 forum approach established.</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
					continue to function) to be set up and which will cater specifically for housebuilders.	John Mawdsley	
19	Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out).	Improved engagement with an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Arrangements being planned for annual key market engagement event with Major developers – circa December 2019	Christine Thurlow, Robert Feakes and Philip Isbell	<p>Please see Progress column.</p> <p>Response from Development Management - Client-Side Panel continues to run on a quarterly basis inviting a broad range of stakeholders.</p> <p>March 2020 workshop event (for smaller housebuilders and large developers around housing delivery) was cancelled due to Covid-19. Virtual meeting to be considered and discussed with the Leads.</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
20	Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships.	Improved engagement which could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Client Side Panel already established for all developers and agents. Establishment of Major developer client side group under discussion. Potentially to sequence after 2019.	Steven Stroud	<p>Please see Progress column.</p> <p>Continuing to work with developers much earlier in the process through Pre-App and PPA (Planning Performance Agreements). LVL to now include Statements of Delivery with application submission.</p> <p>Client-side panel continues to run on a quarterly basis.</p> <p>Also links with Action 18.</p>
21	Undertake a survey of key market	Better engagement and an	Action Plan to implement this measure	Prior to the annual review of this Housing	Survey drafted and being set up as digital “Smart	Christine Thurlow	Digital survey carried out and completed in October 2019. Survey

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
	stakeholders on attitudes to CIL, particularly among major site promoters. In particular, this should seek to understand what impact the CIL charge is having.	opportunity to consider responses as part of the current CIL Review.	will be required.	Delivery Test Action Plan and as part of the current CIL Review which is occurring alongside the Joint Local Plan.	Survey” to be issued to stakeholders.		sent out to 25 Major and minor developers. Only one response received. Analysis forms Appendix B to the report for Overview and Scrutiny. Workshop event (cancelled in March 2020) and likely to be replaced by a virtual meeting was due to include an update of the survey with developers. Looking to carry out survey at virtual meeting
22	As part of the engagement process with stakeholder gain further detailed information about how the planning process (and any delays perceived or real) affects decisions over land options.	Better engagement and an opportunity to consider responses as part of the Review to this Housing Delivery Test Action Plan.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Arrangements being planned for annual key market engagement event with Major developers – circa December 2019	Christine Thurlow, Robert Feakes and Philip Isbell	March 2020 workshop event (for smaller housebuilders and large developers around housing delivery) was cancelled due to Covid-19. Virtual meeting to be considered and discussed with the Leads. Stakeholder events, and engagements to be coordinated as these

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
							could be linked to the Development Management Client Side Panel events held every quarter, possibly with the developer's groups.
23	More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).	Better engagement to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.	Aim to provide quarterly updates of where Outline applications have been granted to RP's and in-house development team.	Robert Feakes and Tracey Brinkley	<p>This action relates to engagement with Housing Associations and the BMSDC housing development team, following grant of outline planning permissions.</p> <p>TB working with RF to receive info on potential S106 opportunities. Number of S106 opportunities coming to us, bids made and successful acquisitions increased significantly.</p> <p>To be done quarterly, aim to start in January 2020 more formally.</p>

	Measure	Objective	Intervention Activity and Status	Timescale	Progress	Lead officer	Quarterly Update 3rd Quarter / July 2020
							RF, TB, and teams have met with RPs pre Covid-19. Two of the RPs have merged. .

APPENDIX C - Results of October 2019 - CIL survey – for the HDTAPs

Sent to developers of Minor and Major development in Babergh and Mid Suffolk October 2019

No of surveys sent out:- 25 in total

Only one response received in connection with Minor development; another part completed form that was not submitted

Results are as follows:-

Q1. The Council believes that its instalments policy is flexible, but we are always looking for ways to improve. What is your opinion on the Council's instalments policies for paying CIL?

A The instalments policies available mostly suit my cash flow and construction timescales

Q 2 Do you feel that you know enough about the CIL Charges that may be applied to your proposed development in advance of starting the application process?

A No - It would be useful to have up to date price per sqm for the current year on the website, like South Norfolk.

Q3 - CIL was put in place to facilitate the delivery of infrastructure and make the contributions that developers have to pay more transparent. Do you feel that paying CIL charges...?

1	A. Makes it more difficult to deliver housing in a timely manner.	0.00%	0	
2	B. Makes it easier to deliver housing in a timely manner		100.00%	1
3	C. Has no effect on delivering housing in a timely manner			

Q4 Do you consider the financial impact of CIL charging when calculating the viability of your proposed development?

A Yes

Q5 CIL is spent on creating and improving infrastructure throughout Babergh and Mid Suffolk Districts for healthy communities, quality of life and sustainable development. Do you feel infrastructure provision improvements can increase the sale of houses?

A No

Q6 Is there anything else you would like to add in relation to CIL and housing delivery?

A -

- The methods and interpretation of the guidelines of calculating have been fluid, and could have made sites unviable.
- MSDC CIL department, in comparison to other Local Authority CIL departments, are unapproachable and seem to have a lack of trust and belief in us as developers, making us seem like we are trying to avoid CIL.

CAT – Survey carried out October 2019

23/01/2020

Appendix D.

Babergh District Council

Housing Delivery Test Action Plan

June 2019.



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1. Introduction

A. Background to this Action Plan

- 1.1 Housing delivery is a known national issue which affects social and economic matters. Various Government initiatives have undertaken reform of the planning system to help stimulate and support house building.
- 1.2 As part of ongoing reform the Government have introduced the Housing Delivery Test (HDT) as a mechanism to monitor housing delivery within local areas.
- 1.3 The HDT measures net additional dwellings provided within a local authority area against the number of dwellings required and shows the performance for each local planning authority in England. The HDT results were published in February 2019 and identified Babergh District Council as achieving 88% of the total number of dwellings required between 1st April 2015 and 31st March 2018. The current housing requirement as identified by the Government's standard method for calculating housing need is 420 dwellings per year. This means the Council has not met the HDT requirements as the results have to be 95% or above to pass the test. As a result, there is a need for Babergh to produce, adopt and publish a Housing Delivery Test Action Plan (HDTAP) within a period of six months from February 2019. This document comprises Babergh Housing Delivery Test Action Plan.
- 1.4 In addition the HDT national results for Babergh require the additional 5% buffer to the figure of 420 per year for calculating the five-year housing land supply. As Babergh District Council and neighbouring local authority Mid Suffolk District Council are operating with full officer integration but are still sovereign Councils, they are producing separate HDTAPs.
- 1.5 However each HDTAP may include elements which apply to both Councils dependent upon the evidence. A joined-up approach and strategy is appropriate and provides consistency where applicable, particularly given that both Councils are producing a Joint Local Plan and have an agreed Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024.

B. Purpose of this Action Plan

- 1.6 This action plan reflects issues and challenges across Babergh and identifies actions to address under delivery of the housing requirement. This action plan will detail the reasons for under delivery and the actions that will be taken to mitigate and increase delivery in the district area. This action plan also identifies ways to reduce future risk of under delivery, by setting out a number of measures to improve levels of delivery as advised by the National Planning Practice Guidance.

- 1.7 Therefore, this action plan looks back to gain a good understanding of issues affecting delivery, but also looks forward to identify potential issues around future delivery and how delivery will be met.
- 1.8 This action plan is a practical document that focuses on effective measures pertinent to Babergh District which is underpinned by appropriate evidence, research and local understanding.

C. Relationship of this Action Plan to other Council activities and priorities

- 1.9 It is important to recognise housing delivery is already a local priority and corporate matter for Babergh District Council. Housing delivery interlinks with other Council functions and services. In particular;
- The Council's **Joint Strategic Plan 2016 – 2020** (also known as a Corporate Plan) identifies housing delivery as a main strategic outcome to ensure more of the right type of homes, of the right tenure are in the right place.
 - The Council's **emerging Joint Local Plan** (Strategic planning) is a statutory document that plans for future development of a local area, produced by the Local Planning Authority in consultation with the community. In law¹ it is also known as the development plan. The emerging Joint Local Plan will consist of strategic and non-strategic policies to be implemented across Babergh District.
 - The **Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024** for Babergh is an agreed vision and long-term commitment for residents to have somewhere affordable to live. Providing a sense of belonging, contributing to health and wellbeing and to strengthen communities. The Homes and Housing Strategy identifies nine strategic aims which amongst other objectives seek to directly stimulate housing delivery and which interlink with strategic planning.

D. Methodology

- 1.10 The Council has undertaken the following key steps to prepare an effective HDT Action Plan that is collaborative, proportionate, effective and fit for purpose. These key steps have been developed into the structure and contents of this document.

Tasks	Methods / Steps taken
Step 1 - Database	Working with others to construct and co-ordinate an approach to achieving a stalled sites database.
Step 2 - Develop an approach	Develop an approach as part of the Unblocking Stalled Sites Strategy engaging with relevant stakeholders to understand the reasons for housing sites stalling, taking into account and producing a report on intelligence about the housing market for Babergh District.
Step 3 - Engagement with	Engage with stakeholders to understand issues and confirm reasons for stalled sites and possible actions to address the issues.

¹ Planning and Compulsory Purchase Act 2004

Stakeholders	
Step 4 – Develop Council’s Strategy	Develop and produce a Council strategy which will comprise the Council’s Housing Delivery Action Plan for addressing issues with stalled sites.
Step 5 – Engage with officers / Councillors	Engage with officers, Councillors and other relevant parties, as advised by the Council, regarding progress and actions.

2. Housing Delivery Analysis

A. National Policy and Guidance

- 2.1 One of the objectives of the National Planning Policy Framework (NPPF)² is to significantly boost the supply of homes. Paragraph 59 states that, “...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 2.2 Paragraph 67 goes on to state that planning policies should identify a supply of “specific, deliverable sites for years one to five of the plan period.” To be considered deliverable, there should be “...a realistic prospect that housing will be delivered on the site within five years”. Paragraph 74 explains that “a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement which:
- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and
 - b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.”
- 2.3 National Planning Practice Guidance provides more guidance on how to demonstrate a five-year supply. It states:
- “Authorities may also consider how they can involve people with an interest in delivery in assessing the deliverability of sites. They may develop benchmarks and assumptions based on evidence of past trends for development lead-in times and build-out rates. Testing these assumptions with developers and using them to inform assessments of deliverability can also make deliverability assessments more robust.” (Paragraph: 030 Reference ID: 3-030-20180913).
- 2.4 Guidance on how authorities can review their five-year land supply annually states the following:

² National Planning Policy Framework (Feb 2019)

“Local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessments. Assumptions can include lapse/non-implementation rates in permissions, lead-in times and build rates, and these assumptions and yardsticks can be used to test delivery information or can be used where there is no information available from site owners/developers to inform the assessment. Assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. Tables of assumptions should be clear and transparent and available as part of assessments.

- 2.5 Evidence of delivery may need to differentiate between types and sizes of developers and of sites, and of type of product. This approach will ensure the assessment of delivery on sites will be as robust as possible.” (Paragraph: 047 Reference ID: 3-047-20180913).

B. The Letwin Review

- 2.6 In October 2018, the Independent Review of Build Out, undertaken by Sir Oliver Letwin MP for the Government, was published. Whilst the study focused on the issue of the build out rate of fully permitted new homes on the largest sites in areas of high housing demand, i.e. not Babergh, it does have some analysis which provides a guide as to the scale of delays on very large, complex sites.
- 2.7 The study reviewed 15 sites, the smallest of which was just under 1,200 units (Trumpington Meadows, Cambridge) and the largest nearly 15,750 units (North Greenwich, Greenwich). It split the assessment into two main phases – first, from outline application to first detailed permission, and second, from first detailed permission to final completion. Each of these phases was split further.
- 2.8 The study found that over half the sites took between one and three years to move from outline application to first detailed permission; only one site took less than a year. By contrast, 80% of sites then took less than nine months to move from first detailed permission to first start on site.
- 2.9 What this suggests is that, for large sites, there is a long lead-in time needed to move the site through the planning process. However, once permission is received, these sites can build out very quickly.
- 2.10 Whilst the assessment of major sites in areas of high housing demand is not directly comparable to the circumstances in Babergh, it is instructive that the large majority of very large sites, which are being brought forward in multiple phases, take less than 12 months to have all conditions discharged and to then commence work on the site itself. Therefore, it would be reasonable to expect that smaller sites, albeit in an area such as Babergh where housing demand is lower, would at the very least take no longer than 12 months to complete the same phase of the permission and development process.

2.11 It is also important to note the Letwin Review identifies absorption rates are the driver of build-out rates. The homogeneity of housing type, tenure and price of the new dwelling on offer versus the limits on the rate the market will absorb is a fundamental driver of slow build out rates. Builders are in a position to exercise control over the sales rate, as rivals are limited in their opportunity to offer customers different types of housing tenure.

C. Local Planning Context

2.12 Babergh District is located within the Ipswich Housing Market Area (IHMA) as identified through evidence base (Strategic Housing Market Assessment as updated). Ipswich Borough Council and part of East Suffolk (the former Suffolk Coastal district area as a whole was included in the IHMA) are also within the same Housing Market Area.

2.13 Babergh District is a predominately rural area with historic settlements, designated land and contains two main towns Sudbury and Hadleigh. The district covers an area of 596 hectares and has a population of approx. 90,800 (ONS 2017).

2.14 Babergh has the A134, A12 and some of the A14 highway networks running through the district. There are mainline railway corridors along the A14 and A12. Babergh is rural in nature with clusters of settlements throughout the rural geographical area.

D. Site Sampling

2.15 Babergh monitoring data has been used to assemble a profile of housing sites for which planning applications for outline planning permission or reserved matters or full planning permission have been submitted. Some site sample data has been analysed as at January 2019 and other data as at May 2019 to identify possible trends and consider likely causes of the trends, as far as they relate to the stalling of a site.

2.16 For the purposes of the assessment of sites in Babergh, they have been split into two different types:

- Major – 10 dwellings or more (net); and
- Minor – less than 10 dwellings (net).

2.17 Major sites, where relevant, have been further disaggregated into sites of between 10 and 50 dwellings and sites of more than 50 dwellings. For all sites there is no differentiation between market or affordable dwellings. Minor sites of less than 10 dwellings have generally been delivered more consistently than major sites. There is little evidence of stalling in the delivery of minor sites.

E. Major Sites

2.18 In January 2019, analysis was undertaken of all major sites in the Babergh housing database which had received at least outline planning permission. This split them by the stage they had reached in the planning process:

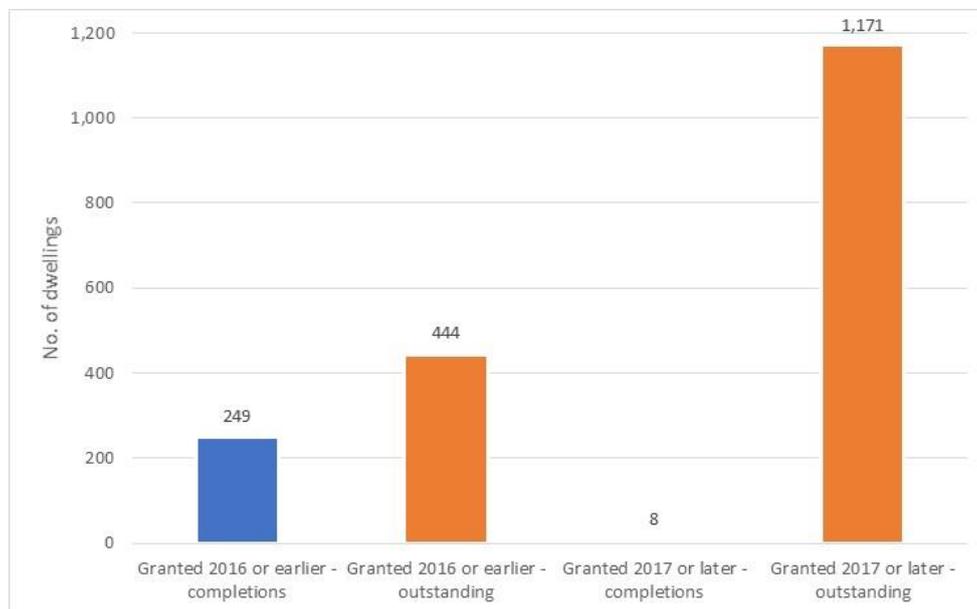
- Outline planning permission;
- Reserved matters permission;
- Full planning permission; and
- Sites under construction.

2.19 The analysis sought to understand which sites had reached their latest stage since 2017 and which sites had reached this stage in 2016 or earlier (representing a minimum three-year time period).

2.20 In total, in January 2019, there were 74 major sites in the database. These sites propose to deliver 5,669 dwellings, making the average size of a major site 76.6 dwellings.

2.21 Figure 2.1 shows the split of major site completions and outstanding dwellings on sites under construction as at January 2019.

Figure 2.1: Dwelling completions on major sites under construction that were granted planning permission pre- and post-2017 – as at January 2019



2.22 This shows that nearly 450 dwellings were granted planning permission at least three years ago but have not been completed. In other words, they have received full planning permission but the dwellings in question have not been built and/or registered as completions. The equivalent figure for the number of dwellings that have full planning permission but have not been completed in the two-year period since 2017 is much higher, at 1,171 dwellings. This is to

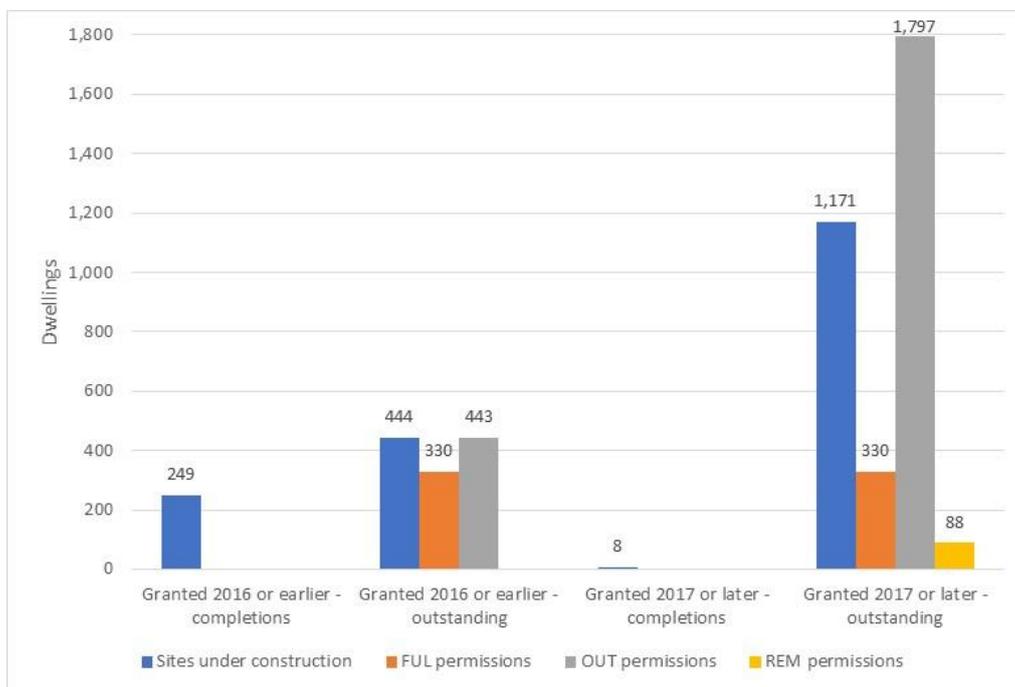
be expected. The 444 dwellings outstanding for at least three years are on seven sites, representing an average site size of 63 dwellings. The profile of sites outstanding since 2017 is that the 1,171 dwellings are on 12 sites, meaning an average site size of 98 dwellings. In other words, these newer sites are larger. Therefore, one would expect them to take longer to move from planning application to completion. It may prove that, without action, rates of site stalling could increase in the near future.

2.23 However, the recent past trend may suggest otherwise. Figure 2.1 shows that the pre-2016 sites have more dwellings outstanding than completed (249 dwellings). Interestingly, these 249 pre-2016 dwelling completions are on three sites, representing an average site size of 83 dwellings, which is larger than pre-2016 sites with dwellings yet to be completed (albeit a very small sample size).

2.24 This analysis shows that the bulk of Babergh’s existing sites in the planning pipeline or recently completed are in the 50-100 dwelling range. However, there is no clear and statistically robust pattern regarding which types of sites take longer to complete.

2.25 Figure 2.2 then shows the breakdown of dwellings on major sites which have planning permission but have not been completed.

Figure 2.2: Major sites with planning permission pre- and post-2017, January 2019



2.26 This shows that, of sites which were granted permission in 2016 or earlier, a total of 330 dwellings on four sites (average 83 dwellings) have full planning permission but have not been started and a further 443 dwellings on two sites (average 222 dwellings) have outline planning permission but have not then had their reserved matters approved. It is noted that the average site size is larger for sites where outline planning permission has been sought compared

with sites where full planning permission is sought. However, these six sites account for 773 dwellings outstanding for at least three years.

- 2.27 For dwellings on sites which have not completed since 2017, a high number – 1,797 dwellings on 16 sites (average 112 dwellings) have outline planning permission and a further 418 dwellings on 14 sites (average 30 dwellings) have either full planning permission or reserved matters approval. Many of these sites will have received this relatively recently so are not necessarily a concern in terms of delivery.

Lead-in times for site delivery

- 2.28 In March 2019, analysis was published by Mid Suffolk District Council³ of national evidence on lead-in times. It cited work undertaken by Chamberlain Walker Economics, published in September 2017 and entitled ‘The Role of Land Pipelines in the UK Housebuilding Process’. This report looked at the supply of land required by housebuilders in order to maintain and grow the number of homes they build. It focused on sites of more than 20 dwellings and identified four phases of delivery from pre-application phase to delivery of first completions. The phases are shown in Table 2.1:

Table 2.1: The phases and lead-in times of the development pipeline

	Phase	Ave. time period
A	Pre-application (e.g. landownership and control, market conditions, planning context including allocation in Local Plan, preparing for planning application and extent of required community consultation).	1.2 – 2.1 years
B	Application to Permission (e.g. inclusion in Local Plan, negotiation of S106, scale of development, performance of LPA).	0.5 – 0.8 years
C	From permission to start on site (e.g. landownership, ground works, site infrastructure, discharge of planning conditions).	1.7 years
D	Under construction (build out) (e.g. constraints of speed of construction, site size and market absorption, infrastructure requirements).	2.3 years
	Total (phases A-D)	5.7 – 7.0 years
	Total (phases B-C)	2.2 – 2.5 years

Source: Chamberlain Walker Economics (2017) *The Role of Land Pipelines in the UK Housebuilding Process*

- 2.29 This shows that, on average, sites of more than 20 dwellings take between 5.7 and 7.0 years to complete all four phases.

- 2.30 The focus of reporting is on phases B and C, i.e. excluding pre-application phase A and the construction phase D. Excluding phases A and D means an average of between 2.2 and 2.5 years nationally, according to the Chamberlain Walker Economics work. The report notes that, since previous

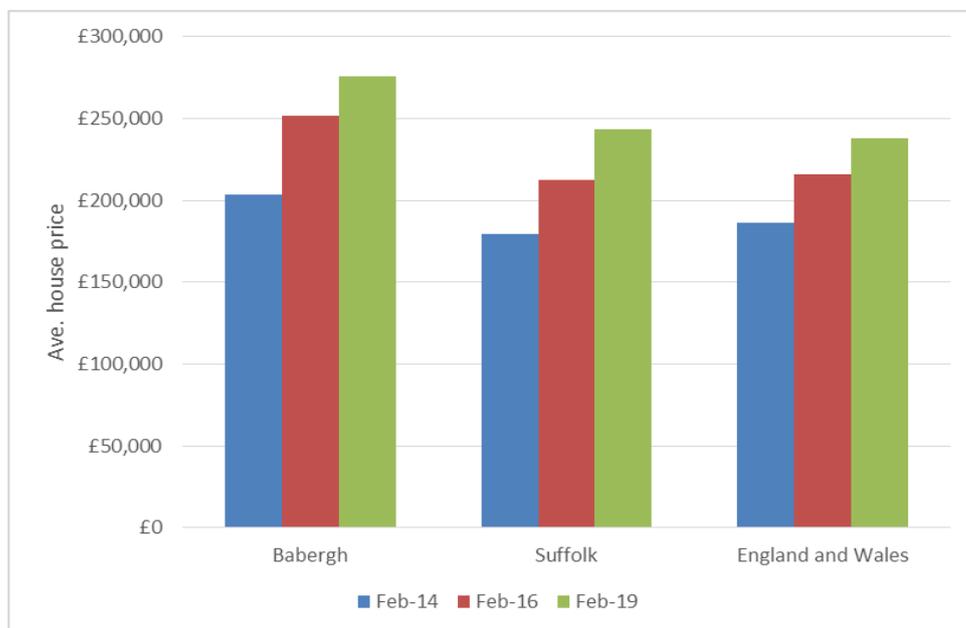
³ Mid Suffolk District Council (2019) Mid Suffolk Housing Land Supply Position Statement 2018/19, March 2019

equivalent analysis was undertaken by the Local Government Association, the average time period for phase C had increased to 1.7 years from a previous range of between 0.6 and 1.0 years. It was considered that this was likely to be the result of an increased issue of pre-commencement conditions (phase C).

F. The Market and Housing Prices

- 2.31 The viability study⁴, which informed the development of the Babergh and Mid Suffolk Community Infrastructure Levy (CIL) charges in 2014 noted that, whilst house prices had generally fluctuated in line with those across England and Wales as a whole, the average house price was consistently above the national average. This picture has continued since; in February 2019, the average house price in Babergh district was £276,147, compared with a national average price of £238,176. Moreover, Babergh is well above the county average for Suffolk, which stood at £243,215 in February 2019. Figure 6.1 shows how this picture has been consistent over the past five years.
- 2.32 Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly. This issue is important to land values, otherwise good sites are likely to stall in the latter stages when they are purchased by the developers that are ultimately going to be selling the units.

Figure 2.3: Average house prices 2014-2019



Source: Land Registry

- 2.33 Often it is the market conditions and who controls the site that will determine whether a site is developed or not or delayed. Evidence assembled by

⁴ Peter Brett Associates (2014) Babergh & Mid Suffolk Community Infrastructure Levy Viability Study, for Babergh and Mid Suffolk District Councils

Chamberlain Walker Economics suggests that nationally over 55% of all planning permissions are held by non-builders. This is because of the way landownership works. This means sites held by non-builders have to be disposed of to a developer and so, for the landowner, a judgement needs to be made as to when to release their site onto the market. It is common local practice that sites are released to the market when they have outline planning permission, which allows a potential buyer the flexibility of submitting their own reserved matters applications which reflect the way they would wish the site to be developed. Many of these sites in Babergh which have outline planning permission, but have not had any reserved matters application submitted, are for sale but yet to attract a buyer.

- 2.34 In all cases the controlling interests of the site with either outline or full planning permission is the only party that can fully explain why a site has been delayed in moving from outline to reserved matters stage. Certainly, if sites are to be sold then there is likely to be at least a period of a few months of marketing, followed by a period when due diligence and legal work is carried out by a prospective buyer. Evidence shows where the time period that has elapsed is between 10 and 12 months, these may not represent significantly stalled sites if they are sold soon and the new owners can complete the planning process and commence development promptly. However, if these sites continue to have no prospective buyers, the process of developing them out could be significantly elongated and therefore they could represent stalled sites.

G. Housing delivery in Babergh and housing land supply

- 2.35 In recent years Babergh District has experienced difficulty in consistently meeting the identified housing requirement. This has been highlighted by the national HDT result measurements (Feb 2019) and can be seen through previous annual monitoring reports, that identifies for Babergh 812 homes were required 2015 – 2018. However, only 714 homes were delivered in the same years. The Babergh land supply position is under review and due to be published later this year.

H. Emerging Joint Local Plan and approach to growth

- 2.36 The Government have standardised the methodology for calculating local housing need as advised within the Planning Practice Guidance (housing and economic development needs assessment).
- 2.37 The emerging Joint Local Plan (JLP) between both Babergh and Mid Suffolk Districts is using a baseline of April 2018, with the Plan end date of March 2036 (18 years) to set the Local Authority housing need target within the Ipswich Housing Market Area. Using the standard methodology, the local housing need for Babergh and the Ipswich Housing Market Area is as follows:

Local Authority Area	Standard Method Total (2018 – 2036)	Annual Local Housing Need Target
Babergh District	7,560	420
<i>Ipswich Housing Market Area</i>	35,334	1963

2.38 The Government's standard methodology approach to local housing need is significantly higher (approximately 40%) than current levels of housing delivery, which creates challenges for the emerging JLP. The Councils proactive approach and strategy to growth is as follows:

- reviewing stalled planning permissions through a focused project;
- carrying out its own development through Mid Suffolk Growth property firm;
- ensuring that the emerging JLP aims to identify and create flexibility for more housing development across the district in the right locations; and
- identifying a buffer of approximately 20% in the supply of land for new housing up to 2036.

2.39 The spatial distribution of growth (through the Joint Local Plan) seeks to reduce the need to travel through good access to services and facilities. Babergh District will maintain its Ipswich fringe areas as historic strategic designations for growth, which recognises the cross-boundary influence of the Suffolk county town of Ipswich as a regional service centre. Also, sustainable urban areas and market towns will be allocated growth due to their significant service and facility provision. Core villages and all other settlements have been appropriately scored through a weighted scoring system due to their dispersed nature.

2.40 The planned spatial distribution that the Council are producing is mindful of the inherent market strengths within the area. The Council has sought to ensure that the most suitable and deliverable sites are proposed. In many instances this requires the complex alignment with infrastructure improvement programmes and investment to ensure sustainable growth.

2.41 High house prices (and low average wages/salaries) across Babergh mean that it is difficult for people to purchase or rent a house on the open market. Therefore, appropriate size, type and tenure of affordable housing are key factors to success across the whole of the district.

2.42 The transport corridors of the A12, A14 and mainline railway lines represent a strong effect upon market forces and the demand for housing. Compatible growth along these areas can reduce the need to travel or encourage sustainable travel due to access to public transport.

2.43 A significant number of Neighbourhood Plans (NP) are emerging throughout the Local Plan area, with a range of local issues and objectives being planned for. The District Council is drafting minimum housing requirement figures for these areas to assist the NP groups.

2.44 The emerging JLP for both Babergh and Mid Suffolk Districts is currently at Regulation 18 stage. The emerging JLP has already been through a previous Regulation 18 consultation in August 2017. Due to the number of consultation responses received at that time in combination with changes to the National Planning Policy Framework, it is considered appropriate and necessary to undertake a further Regulation 18 consultation stage. This will take place in the summer 2019.

I. Community Infrastructure Levy and Viability

2.45 Work to update Babergh Community Infrastructure Levy (CIL) evidence base is being undertaken concurrently with the Housing Delivery Test Action Plan work. The purpose of this CIL review work is to update the study undertaken in 2014 which informed the development of the CIL charge which was subsequently brought into force in April 2016. It provided an assessment of the viability of different types of development across Babergh District and its ability to support a CIL charge without undermining the viability of development.

2.46 At this stage in the viability work, it is understood that there have been no material changes in circumstances since 2014 in terms of the viability of residential development across the district. Generally, the market for residential development is reasonable, but is susceptible to issues on difficult sites and sites with abnormal costs. However, there is nothing to suggest a more widespread structural problem which is causing sites to stall. Minor sites – of less than ten dwellings – have generally been delivered more consistently than major sites. It is considered that this is because most of these sites are in rural, village locations where values are higher and the size of the sites mean there are fewer issues that could cause a delay because of viability issues.

2.47 When the CIL was brought into effect in April 2016, this required development to make a non-negotiable payment towards district-wide infrastructure provision. The payment required is based on the size, location and type of development. In Babergh District outside Sudbury and Hadleigh, new housing development of more than two dwellings is required to pay £115 per square metre (psm) + indexation on net additional floorspace, excluding affordable housing. In Sudbury and Hadleigh the rate is £50psm.

2.48 Simultaneous to this Babergh brought into force the CIL payment plan schedule, which is available on the Council's website⁵ detailing CIL liability.

2.49 It is important that Babergh continues to closely monitor progress with the build-out of sites and to engage with developers in order to better understand the common types of issues which delay commencement once a site is 'shovel-ready'. In particular, it could be a clearly stated intention of the Council to engage with all developers of sites with planning permission where there is only 12 months to run before the permission expires. The purpose of the

⁵ Link to CIL payment schedule: <https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/MSDC-instalments-policy-Jan-2016.pdf>

engagement process will be to try to understand what is needed to ensure that the permission is built out and what the Council can do to support this.

J. Root Cause Analysis (Key Issues and Challenges)

- 2.50 There is a strong and compelling vision, aim and set of objectives running through Babergh District Council regarding housing delivery. This is to improve and achieve housing delivery, from a corporate level right through to a strategic planning and local community level.
- 2.51 A broad range of evidence has been sought by the Council and collaboration from key stakeholders has been undertaken for the housing supply process and to better understand what the key issues and challenges are that influence and create low delivery rates. The database has been created alongside direct knowledge of local sites, land and development activity. Market intelligence has been undertaken to understand the reasons for housing sites stalling.
- 2.52 Site samples have been used as the method to establish key issues and challenges in housing delivery within Babergh. The key issues and challenges that have emerged from this data analysis are as follows and have been set out in to the following three key issue areas (early stallers, condition stallers and late-stage stallers):
- 2.53 **Issue 1: Early Stallers – are sites that have yet to receive full planning permission when a planning application – either full or outline – has been submitted.**

Time Period

- I. A number of outline planning permissions have not yet moved to the reserved matters stage after ten months (the national average time period), but there is no clear reason as to why, as seen within the Babergh Stalled Sites Market intelligence report (May 2019).

Number of outline permissions

- II. Such reasons why a number of outline planning permissions have not moved to the reserved matters stages after ten months could be either a reserved matters application is being prepared, pre-application engagement by the promoter in respect of reserved matters or clear assurance from the promoter about the intention to proceed. It is also clear there are outline planning permissions that may be delayed due to being sold on.

Speculative permissions and Controlling interests

- III. A number of planning permissions are speculative. The evidence has identified that some sites are under the controlling interests such as property investment companies being held on to, also known as 'banking', sold or bought. The market conditions determine what the control of property investment companies choose to do with the site, which in succession can often determine what potential buyers choose to do as well. With any degree

of uncertainty often the approach of sellers and buyers is to wait and see what happens to the market over the short-term.

2.54 **Issue 2: Condition Stallers** – are sites which are in the period between the grant of full planning permission and all conditions having been discharged, i.e. being able to start on site.

Difficulties in discharging conditions

- I. There are difficulties in discharging conditions on planning applications. Analysis of such sites show it is often the case the sites are landowner-led, property development company or national housebuilder. Therefore, the reasons are likely to be different in each case, but are likely to be in relation to the following:
 - Sites controlled by housebuilder where the site could be developed without the need to be sold first.
 - Sites being taken forward by the landowner, but permission has expired. This suggests that the landowner may have changed their mind about development – such decisions could be argued to be more likely when led by a private landowner compared with if they are led by a developer or property company that is solely in the business of developing or selling sites.
 - Sites under the control of a property company.

Financial viability

- II. Financial viability is often a primary driver. 2016 research published on stalled residential sites in England⁶ reviewed a range of site typologies in different parts of the country from the point at which they were ‘shovel ready’, i.e. they were able to commence construction on site, the nature of the research can clearly be applied to sites which are almost shovel-ready, i.e. only have conditions to be discharged. What this research found was that whilst financial viability is likely to be a primary driver of site stalling, the reasons for stalling are often more nuanced. Housebuilders need to maintain an inventory of sites in order to manage their workflow although they account for a relatively small proportion of stalled sites. Other landowners seem to be exercising their options to delay the sale of their sites. As the research notes, “Essentially, owners’ decisions on whether to sell a site to a developer are analysed in terms of weighing the opportunity costs of keeping their site vacant against the expected gain from delaying sale until more favourable market conditions prevail.” There is also local knowledge that some developers have described their ‘sell-to-build’ business model in which they must sell a unit in order to finance the building of another unit. This means build out of the whole scheme could be slow or stall completely depending on the market conditions and financial viability.

⁶ McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, *Planning Practice and Research*, 31 (2). pp. 132-153.

- 2.55 **Issue 3: Late-stage Stallers** – are sites which have reached the point when construction may commence, i.e. there are no further administrative requirements to be met.

Financial viability

- I. As with Issue 2 – condition stalling (above) financial viability is also an issue for late stage stalled sites. The 2016 research on stalled residential sites in England⁷ found that financial viability is likely to be a primary driver of site stalling, particularly in lower value house areas. It notes: “The overarching shifts are that house values have fallen in many areas, developers’ and lenders’ risk aversion has increased and, as a result, once viable financially feasible projects are no longer feasible. At current market prices and taking into account development costs, housing development is not viable on a substantial proportion of what is often defined as housing land supply.”

Realistic pricing

- II. Evidence shows earlier in this document house prices in Babergh have generally been consistent market strength over the past five years. Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly.

Site commencement

- III. It has also been recognised through development management collaborative work in relation to infrastructure planning, community infrastructure levy work and housing land supply work that some sites commence in order to keep the planning permission live, but there is no immediate intention to build out the site. The exact reason is not known, but on the balance of probability it is expected to be due to market conditions and finances which would be involved. Ultimately it is only the applicant/landowner/site promoter who can clearly explain the reasons why their individual site is delayed.

Alternative permissions

- IV. Some sites are known to have benefit from a number of alternative permissions. This could be a full planning permission, after an initial outline or a subsequent section 73 or a Minor Material Amendment (MMA) or Non Material Amendment (NMA) especially if there has been a change of owner since the original planning permission was granted.

K. General Conclusions

- 2.56 The data and evidence show there are three key issues (as detailed above) as to why there is some delayed delivery of housing development within Babergh. In drawing conclusions from the identified key issues, it is apparent these focus around **land speculation**, which includes the business of developing or selling sites, **controlling interests** and **market conditions**, which are often the main areas beyond the Local Planning Authorities ability

⁷ McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, Planning Practice and Research, 31 (2). pp. 132-153.

to control to manage. However, it also requires communication between stakeholders and the Council with transparency for understanding.

3. Key Actions and Responses

- 3.1 This Babergh Housing Delivery Test Action Plan focuses on the timely delivery of new housing by setting out a range of practical, proportionate and proactive measures. This is to address low housing delivery rates, which will be monitored and reviewed.
- 3.2 The Joint Strategic Plan (2016 – 2020) recognises strategic outcomes, which includes housing delivery can only really be achieved through collaboration. As part of the corporate plan housing is a priority where continued focus and efforts will be sustained. The vision for housing priority is to ensure more of the right type of homes, of the right tenure in the right location. This vision is very firmly fixed in achieving sustainable development not development at any cost to the detriment of other necessary considerations.
- 3.3 The solutions below are the actions proposed in response to the identified key issues and challenges (early stallers, condition stallers and late-stage stallers) mentioned earlier in this Action Plan.

A. **Solution 1: Early Stallers:**

- I. **Engage regularly with the site promoters of ‘Early Staller’ sites** – more generally as part of this engagement, and as part of an ongoing relationship with site promoters. It will be important to understand, in a Babergh district context, how decisions are made about whether to sell a site once it has received outline planning permission or whether to seek reserved matters approval before selling the site. This will help to build up possible typologies of sites, which will form part of the monitoring process.
- II. **Memorandum of Understanding on Deliverability** – where necessary and prepared by two parties to address issues of deliverability in respect of the development at a particular site.
- III. **Update Babergh’s local list of information required to support a planning application** – so that it includes a requirement for major outline planning applications (where all or most matters are reserved) to provide information regarding timescales and build out rates for the scheme. This will need to be proactively supported by planning case officers to ensure that the information submitted is reasonable. For example, requests for viability requirements, timescales, build-out rates from applicants/agents to demonstrate a reasonable prospect that the site, if acceptable, will be developed and delivered.

B. **Solution 2: Condition Stallers:**

- I. **Providing a checklist and a sample of ‘model’ information for different conditions** in order to proactively assist applicants/agents by ensuring that

they are clear about the level and type of information needed to enable the discharge of condition. Ongoing dialogue between the local planning authority and consultees/agents/developers is taking place to aid the process of discharging conditions and manage expectations. To ensure clear understanding between all, of what type of condition is necessary and how the condition is to be worded and discharge is also clear. This in theory should help speed the discharge of conditions process up between information submissions, validation and discharge.

C. Solution 3: Late-stage Stallers:

- I. **Continue to closely monitor progress** with the build-out of sites and engage with developers in order to better understand the common types of issues which delay commencement once a site is 'shovel-ready'.
- II. **Engage with all developers of sites with planning permission where there is only 12 months** to run before the permission expires. Try to understand what is needed to ensure that the permission gets built out.

D. General recommendations:

- 3.4 The data⁸ has demonstrated that there are some common themes in the consideration of when and why sites stall. Consequently, three typologies of stalling have been identified and the following recommendations are made. It is also important to note the identified solutions and general recommendations directly interlink with the priorities of the Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan), the emerging Joint Local Plan (Strategic planning) and the Homes and Housing Strategy 2019 – 2024, meaning the overall vision, function and delivery priorities are aligned within the organisation.
- I. Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out). The meeting should be an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.
 - II. Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships. This could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.
 - III. Given that it has been in place for over three years, it has had time to bed in and therefore applicants should be familiar with it and have a good

⁸ Mid Suffolk Stalled Sites Market Intelligence report (May 2019)

appreciation of any issues it has created. This should be part of a greater willingness to have a more open conversation with regular promoters, investors and developers in Babergh.

- IV. As part of this conversation, seek to understand more about how the planning process (and any delays, perceived or real) affects decisions over land options.
- V. More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).

3.5 Added to the above it is important to include in this Action Plan recommendations for improving housing delivery contained in the Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024. These are as follows:

- Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.
- Ensuring a smarter and improved pre-application process.
- Ensuring applications are approved on time and Section 106 agreements are signed off promptly.
- Discharging planning conditions promptly to ensure development can commence.
- Viability testing of proposed land allocations at plan making stage.
- Reviewing stalled sites to ensure blockages and delays to development are resolved.
- Creating a flexible approach to tenure mix to accelerate delivery.
- Developing new private homes through Council owned housing companies.
- Developing 214 new council homes in Babergh and 200 in Mid Suffolk through the Housing Revenue Account in the period up to 2022.
- Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.
- Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.
- Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.
- Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).
- Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.
- Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.

3.6 It is apparent the progress and success of housing delivery is a collaborative process between both the public and private sector and communities. It is recognised Babergh District Council is undertaking a number of steps and measures as seen from the solutions and general recommendations earlier for delivery to be achieved. But, in reviewing all data and issues it is apparent Babergh District Council plays a small but influential part in the delivery success process. The Council can continue to add value to the process by monitoring, reviewing and continuing engagement, measuring progress through this Housing Delivery Test Action Plan and any other relevant monitoring document.

4. Monitor, Review and Performance

4.1 This Action Plan will be reviewed and updated on an annual basis as part of the Council's joint annual monitoring report process and alongside the review of the Council's overarching Joint Homes and Housing Strategy.

4.2 The implementation of the identified actions will require collaboration across Council services areas and this Action Plan is to be recommended for adoption by Babergh District Council a Full Council meeting.

4.3 The table below sets out how the actions together with timescales.

	Measure	Objective	Intervention Activity and Status	Timescale
1	Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.	Providing clarity and certainty through the provision of a Joint Local Plan comprising development policies including those providing for land allocations together with a sound and evidenced Infrastructure Delivery Plan.	Work in progress.	Public consultation on the next version of the emerging Joint Local Plan anticipated in Summer 2019.
2	Ensuring a smarter and improved pre-application process.	Getting our pre-application process right first time such that application decision is consistent with pre application advice.	New revised scheme in place and being monitored.	Presentation of report to both Councils Cabinet in respect of revisions to existing scheme in March 2019. Continued monitoring

				subsequently to ensure that scheme is effective.
3	Ensuring applications are approved on time and Section 106 agreements are signed off promptly.	No delay to planning application determination.	Work in progress.	Ongoing and publication of statistics to confirm performance and outcomes.
4	Discharging planning conditions promptly to ensure development can commence.	No delays in the discharge of planning conditions.	Action Plan to be devised agreed and implemented to achieve outcome.	Ongoing and active monitoring in place but action plan needed given feedback to the Consultant for the Housing Delivery Action Plan/Unblocking stalled site project to achieve desired outcome.
5	Viability testing of proposed land allocations at plan making stage.	Appointment of Consultants who are reviewing the draft charging regime for Community Infrastructure Levy (CIL) together with the Infrastructure requirements of each land allocations to ensure that all site allocations are viable and therefore deliverable.	Work in progress.	To meet the Joint Local Plan and Infrastructure Delivery Plan timetable as set out above.
6	Reviewing stalled sites to ensure blockages and delays to development are resolved.	Development of a database and an approach to unblocking stalled sites. Production of a report which outlines intelligence around the housing market	Work in progress.	Project work commenced with an amended Brief in December 2018 and with a completion date of end of May/ early June 2019.

		which will provide a foundation for the Strategy and which will comprise the Councils Housing Delivery Test Action Plans.		
7	Creating a flexible approach to tenure mix to accelerate delivery.	Production and adoption of Affordable Housing SPD linked to adoption of Joint Local Plan. Inclusive of guidance on Community-led housing, and specialist housing provision.	Action Plan required.	Timetable dependent upon progress of the JLP. To be reviewed when JLP timescale confirmed.
8	Developing new private homes through Council owned housing companies.	A programme to deliver 414 homes for the Babergh and Mid Suffolk District Councils own affordable homes programme has been devised. Approx. 300 of these will be new build.	Work in progress.	3-5 year rolling programme has been devised.
9	Developing 214 new council homes in Babergh Suffolk and 200 in Mid Suffolk through the Housing Revenue Account in the period up to 2022.	Ensure the delivery of the Affordable Homes Programme has the resources to deliver at speed. Aim to maximise the level of grants from various pots to ensure that the homes can be subsidised and therefore let at an affordable /social rent. Maximise the use of Council land/assets. Engage with	Action Plan in place.	3-5 year rolling programme has been devised.

		planners and consultants at an early stage to help increase the speed of delivery.		
10	Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards	Strategic Housing Team will liaise regularly with Homes England to maximise Affordable Housing Programme investment into both Council areas.	Action plan required.	Obtain figures for each financial year and summarise at the end of each Homes England funding programme to Members. Apply for Community Housing Fund prior to December 2019.
11	Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.	Increase supply and delivery against assessed needs. Identification of needs data will assist in attracting delivery partners to provide a purpose-built scheme.	Action Plan required	Plan for specific needs on a three-year rolling programme in conjunction with commissioning partners.
12	Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations	Investigate using these powers as part of the Strategy for unblocking stalled sites where circumstances dictate that this is an appropriate measure	Work to be competed when appropriate and needed on a case by case basis	Not a 'fixed' time piece of work. Circumstances of each case would determine whether there is a need to investigate further, consider use of Compulsory Purchase Order powers, then instigate and monitor. Ongoing
13	Creating a stronger relationship with Homes England and optimise the funding streams for which the Council is eligible, including borrowing within the Housing Revenue	Better engagement with Homes England should re-assure them of the Council's ambitions with	Work in progress.	Ongoing.

	Account (HRA).	regards to own direct delivery. By giving confidence of delivery, are more likely to receive grant funding. By being clear on programme and borrowing requirements gives the Development Team the chance to respond to opportunities available at short notice from developers.		
14	Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.	Continue to use the Community Housing Fund allocation from 2017 to support communities to develop community-led housing initiatives. Ensure the JLP includes policies which favours community-led housing. Assist community groups to make applications to Homes England for Community Housing Fund grant in 2019.	Work in progress.	By the end of 2020/21 to have successfully funded the setting up of additional CLTs across the Babergh and Mid Suffolk districts.
15	Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.	To secure good working relationships with new partners to secure more certainty around affordable housing delivery. Encourage all partners to invest in communities and secure new schemes.	Action Plan required.	By December 2019 for feasibility work. April 2020 to secure two suitable sites for pilot schemes.

16	<p>Early Stallers</p> <p>(i) Engage regularly with the site promoters of “early staller sites”.</p> <p>(ii) Secure memorandums of understanding on deliverability.</p> <p>(iii) Update Local List of information required to support a planning application.</p>	Focused engagement, enhanced processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
17	<p>Condition stallers</p> <p>(i) Provide a checklist and a sample of “model” information for different conditions.</p>	Focused processes to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
18	<p>Late stallers</p> <p>(i) Continue to monitor build out of sites.</p> <p>(ii) Engage with developers of all sites with planning permission where there is only 12 months to run before the permission expires.</p>	Focused engagement processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
19	Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out).	Improved engagement with an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
20	Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships.	Improved engagement which could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.

		process.		
21	Undertake a survey of key market stakeholders on attitudes to CIL, particularly among major site promoters. In particular, this should seek to understand what impact the CIL charge is having.	Better engagement and an opportunity to consider responses as part of the current CIL Review.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan and as part of the current CIL Review which is occurring alongside the Joint Local Plan.
22	As part of the engagement process with stakeholder gain further detailed information about how the planning process (and any delays perceived or real) affects decisions over land options.	Better engagement and an opportunity to consider responses as part of the Review to this Housing Delivery Test Action Plan.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
23	More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).	Better engagement to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.

4.4 A thorough review of this annually will include updating of data, housing delivery performance figures from all sources, any changes to market intelligence and an analysis of outcomes and achievements in respect of all actions reviewed

5. References

5.1 The following data has been used in this document:

- Babergh stalled sites database (June 2019) and summary
- Babergh Stalled Sites Market Intelligence report (May 2019)
- Babergh and Mid Suffolk Joint Annual Monitoring Reports 2015 – 2018
- Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan)
- Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024

6. Appendix 1

6.1 The appendix to this document comprises the summary of the Council's Stalled sites database (June 2019).

A. Methodology used for database construction

6.2 In order to construct a database the following premise was used: A development site which has all the necessary approvals for housing development (full planning permission, reserved matters approval, conditions discharged) but for whatever reason has not yet commenced on site and is therefore categorised as stalled.

6.3 Current position on working database:

A site can be stalled at different stages of its progress through the planning process phases, such as: -

- a. 'Early stallers': Before full planning permission is granted.
- b. 'Conditions stallers': The period between the grant of full planning permission and all conditions having been discharged, i.e. ready for construction.
- c. 'Late-stage stallers': After the point at which construction can commence.

6.4 For the purpose of this exercise, the planning process is broken down into 3 phases:

Phase 1 – Outline Planning Permission to Full Planning Permission or Reserved Matters.

Phase 2 – Full Planning Permission or Reserved Matters to all pre-commencement conditions being discharged.

Phase 3 – Under construction to completion.

6.5 At each phase, a site could be assessed as stalled, after a timeframe which is deemed reasonable for progression from one phase to the next. At each phase, a "reason" for the site to be stalled has been devised to establish a stalled site category, such as:

At phase 1:

- A) No detailed permissions to enable a commencement to occur.
- B) Site for sale or in process of being sold.

At phase 2:

- A) No known condition discharge.
- B) Condition discharge occurring, yet no start date planned.
- C) Condition discharge occurring, and planned start on site but no start yet.
- D) No known condition discharge due to known impediments for commencement.
- E) No known condition discharge as site for sale or in process of being sold.

At phase 3:

- A) Work has started on site, however development has stopped/stalled.
- B) Construction progressing – monitoring only.

B. Table 1: Summary of number of Planning Permissions and dwellings permitted by typology - May 2019

		Phase 1: Early stallers		Phase 2: Condition stallers					Phase 3: Late-stage stallers		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Babergh	Number of Sites	13	5	7	10	-	-	1	-	23	59
	Number of Dwellings	1,907	333	274	460	-	-	14	-	1,715*	4703

*Please note: Sproughton, Hybrid permission (B/15/00993) for Wolsey Grange is for 475 dwellings under outline, 145 dwellings with full permission.

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Appendix E

Mid Suffolk District Council

Housing Delivery Test Action Plan

June 2019



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1. Introduction

A. Background to this Action Plan

- 1.1 Housing delivery is a known national issue which affects social and economic matters. Various Government initiatives have undertaken reform of the planning system to help stimulate and support house building.
- 1.2 As part of ongoing reform the Government have introduced the Housing Delivery Test (HDT) as a mechanism to monitor housing delivery within local areas.
- 1.3 The HDT measures net additional dwellings provided within a local authority area against the number of dwellings required and shows the performance for each local planning authority in England. The HDT results were published in February 2019 and identified Mid Suffolk District Council as achieving 81% of the total number of dwellings required between 1st April 2015 and 31st March 2018. The current housing requirement as identified by the Government's standard method for calculating housing need is 556 dwellings per year. This means the Council has not met the HDT requirements as the results have to be 95% or above to pass the test. As a result, there is a need for Mid Suffolk to produce, adopt and publish a Housing Delivery Test Action Plan (HDTAP) within a period of six months from February 2019. This document comprises Mid Suffolk's Housing Delivery Test Action Plan.
- 1.4 In addition the HDT national results for Mid Suffolk require the addition of a 20% buffer to the figure of 556 per year for calculating the five-year housing land supply. As Mid Suffolk District Council and neighbouring local authority Babergh District Council are operating with full officer integration but are still sovereign Councils, they are producing separate HDTAPs.
- 1.5 However each HDTAP may include elements which apply to both Councils dependent upon the evidence. A joined-up approach and strategy is appropriate and provides consistency where applicable, particularly given that both Councils are producing a Joint Local Plan and have an agreed Homes and Housing 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024.

B. Purpose of this Action Plan

- 1.6 This action plan reflects issues and challenges across Mid Suffolk and identifies actions to address under delivery of the housing requirement. This action plan will detail the reasons for under delivery and the actions that will be taken to mitigate and increase delivery in the district area. This action plan also identifies ways to reduce future risk of under delivery, by setting out a number of measures to improve levels of delivery as advised by the National Planning Practice Guidance.

- 1.7 Therefore, this action plan looks back to gain a good understanding of issues affecting delivery, but also looks forwards to identify potential issues around future delivery and how delivery will be met.
- 1.8 This action plan is a practical document that focuses on effective measures pertinent to Mid Suffolk District which is underpinned by appropriate evidence, research and local understanding.

C. Relationship of this Action Plan to other Council activities and priorities

- 1.9 It is important to recognise housing delivery is already a local priority and corporate matter for Mid Suffolk District Council. Housing delivery interlinks with other Council functions and services. In particular;
- The Council's **Joint Strategic Plan 2016 – 2020** (also known as a Corporate Plan) identifies housing delivery as a main strategic outcome to ensure more of the right type of homes, of the right tenure are in the right place.
 - The Council's **emerging Joint Local Plan** (Strategic planning) is a statutory document that plans for future development of a local area, produced by the Local Planning Authority in consultation with the community. In law¹ it is also known as the development plan. The emerging Joint Local Plan will consist of strategic and non-strategic policies to be implemented across Mid Suffolk District.
 - The **Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024** for Mid Suffolk is an agreed vision and long-term commitment for residents to have somewhere affordable to live. Providing a sense of belonging, contributing to health and wellbeing and to strengthen communities. The Homes and Housing Strategy identifies 9 strategic aims which amongst other objectives seek to directly stimulate housing delivery and which interlink with strategic planning.
- 1.10 Mid Suffolk District Councillors decided in 2018/19 to allocate funds towards a new project for the unblocking of stalled housing sites within the District. The Council's objective for this project is to improve the delivery of housing by agreeing a series of action points and a strategy following an analysis of detailed work around housing delivery. Such analysis has taken the form of the construction of a database capturing extant planning permissions, pipeline data with a view to understanding the reasons for the current delivery rate by engaging with stakeholders in the process as well as undertaking housing market intelligence. The outcomes of this project are encapsulated in this Housing Delivery Test Action Plan. The approach to undertaking this project initiative and the Housing Delivery Action Plan are detailed in the methodology section below.

¹ Planning and Compulsory Purchase Act 2004

D. Methodology

1.11 The Council has undertaken the following key steps to prepare an effective HDT Action Plan that is collaborative, proportionate, effective and fit for purpose. These key steps have been developed into the structure and contents of this document.

Tasks	Methods/Steps taken
Step 1 - Database	Working with others to construct and co-ordinate an approach to achieving a stalled sites database.
Step 2 - Develop an approach	Develop an approach as part of the Unblocking Stalled Sites Strategy engaging with relevant stakeholders to understand the reasons for housing sites stalling and taking into account and producing a report on intelligence about the housing market for Mid Suffolk District.
Step 3 - Engagement with Stakeholders	Engage with stakeholders to understand issues and confirm reasons for stalled sites and possible actions to address the issues.
Step 4 – Develop Council’s Strategy	Develop and produce a Council strategy which will comprise the Council’s Housing Delivery Action Plan for addressing issues with stalled sites.
Step 5 – Engage with officers / Councillors	Engage with officers, Councillors and other relevant parties, as advised by the Council, regarding progress and actions.

2. Housing Delivery Analysis

A. National Policy and Guidance

2.1 One of the objectives of the National Planning Policy Framework (NPPF)² is to significantly boost the supply of homes. Paragraph 59 states that, “...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

2.2 Paragraph 67 goes on to state that planning policies should identify a supply of “specific, deliverable sites for years one to five of the plan period.” To be considered deliverable, there should be “...a realistic prospect that housing will be delivered on the site within five years”. Paragraph 74 explains that “a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement which:

a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and

² National Planning Policy Framework (Feb 2019)

b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.”

- 2.3 National Planning Practice Guidance provides more guidance on how to demonstrate a five-year supply. It states:

“Authorities may also consider how they can involve people with an interest in delivery in assessing the deliverability of sites. They may develop benchmarks and assumptions based on evidence of past trends for development lead-in times and build-out rates. Testing these assumptions with developers and using them to inform assessments of deliverability can also make deliverability assessments more robust.” (Paragraph: 030 Reference ID: 3-030-20180913).

- 2.4 Guidance on how authorities can review their five-year land supply annually states the following:

“Local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessments. Assumptions can include lapse/non-implementation rates in permissions, lead-in times and build rates, and these assumptions and yardsticks can be used to test delivery information or can be used where there is no information available from site owners/developers to inform the assessment. Assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. Tables of assumptions should be clear and transparent and available as part of assessments.

- 2.5 Evidence of delivery may need to differentiate between types and sizes of developers and of sites, and of type of product. This approach will ensure the assessment of delivery on sites will be as robust as possible.” (Paragraph: 047 Reference ID: 3-047-20180913).

B. The Letwin Review

- 2.6 In October 2018, the Independent Review of Build Out, undertaken by Sir Oliver Letwin MP for the Government, was published. Whilst the study focused on the issue of the build out rate of fully permitted new homes on the largest sites in areas of high housing demand, i.e. not Mid Suffolk, it does have some analysis which provides a guide as to the scale of delays on very large, complex sites.

- 2.7 The study reviewed 15 sites, the smallest of which was just under 1,200 units (Trumpington Meadows, Cambridge) and the largest nearly 15,750 units (North Greenwich, Greenwich). It split the assessment into two main phases – first, from outline application to first detailed permission, and second, from first detailed permission to final completion. Each of these phases was split further.

- 2.8 The study found that over half the sites took between one and three years to move from outline application to first detailed permission; only one site took less than a year. By contrast, 80% of sites then took less than nine months to move from first detailed permission to first start on site.
- 2.9 What this suggests is that, for large sites, there is a long lead-in time needed to move the site through the planning process. However, once permission is received, these sites can build out very quickly.
- 2.10 Whilst the assessment of major sites in areas of high housing demand is not directly comparable to the circumstances in Mid Suffolk. It is instructive that the large majority of very large sites, which are being brought forward in multiple phases, take less than 12 months to have all conditions discharged and to then commence work on the site itself. Therefore, it would be reasonable to expect that smaller sites, albeit in an area such as Mid Suffolk where housing demand is lower, would at the very least take no longer than 12 months to complete the same phase of the permission and development process.
- 2.11 It is also important to note the Letwin Review identifies absorption rates are the driver of build-out rates. The homogeneity of housing type, tenure and price of the new dwelling on offer versus the limits on the rate the market will absorb is a fundamental driver of slow build out rates. Builders are in a position to exercise control over the sales rate, as rivals are limited in their opportunity to offer customers different types of housing tenure.

C. Local Planning Context

- 2.12 Mid Suffolk District is located within the Ipswich Housing Market Area (IHMA) as identified through evidence base (Strategic Housing Market Assessment as updated). Ipswich Borough Council and part of East Suffolk (the former Suffolk Coastal District Area as a whole was included in the IHMA) are also within the same Housing Market Area.
- 2.13 Mid Suffolk District is one of the largest districts in England and spans an area of 868 hectares and contains a population of approx. 101,500 (ONS 2017). Stowmarket is the largest town in the district; there are also the towns of Eye and Needham Market. Mid Suffolk has a large proportion of the A14, A140 and some of the A143 highway network. There are mainline railway corridors along the A14 and from the north. Mid Suffolk is rural in nature with clusters of settlements throughout the rural geographical area.

D. Site Sampling

- 2.14 Mid Suffolk monitoring data has been used to assemble a profile of housing sites for which planning applications for outline planning permission or reserved matters or full planning permission have been submitted. Some site sample data has been analysed as at January 2019 and other data from April 2019 to identify possible trends and to consider likely causes of the trends, as far as they relate to the stalling of a site.

2.15 For the purposes of the assessment of sites in Mid Suffolk, they have been split into two different types:

- Major - 10 dwellings or more (net); and
- Minor – less than 10 dwellings (net).

2.16 Major sites, where relevant, have been further disaggregated into sites of between 10 and 50 dwellings and sites of more than 50 dwellings. For all sites there is no differentiation between market or affordable dwellings.

E. Major and Minor Sites

2.17 In January 2019, analysis was undertaken of all sites in the Mid Suffolk housing database which had received at least outline planning permission. This included major and minor sites and the database split them by the stage they had reached in the planning process as follows:

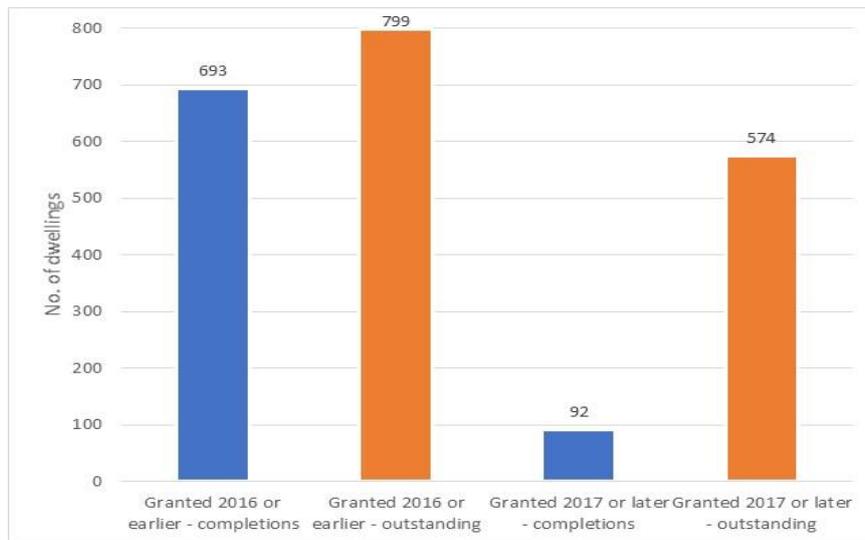
- Outline planning permission;
- Reserved matters permission;
- Full planning permission; and
- Sites under construction.

2.18 This analysis sought to understand which sites had reached their latest stage since 2017 and which sites had reached that stage in 2016 or earlier (representing a minimum three-year time period).

2.19 In total, in January 2019, there were 627 sites in the database – 554 were minor sites and 73 were major sites. These sites propose to deliver 6,783 dwellings, with major sites accounting for 5,973 dwellings and minor sites for 810 dwellings. This makes the average size of a major site 81.8 dwellings and a minor site just under 1.5 dwellings.

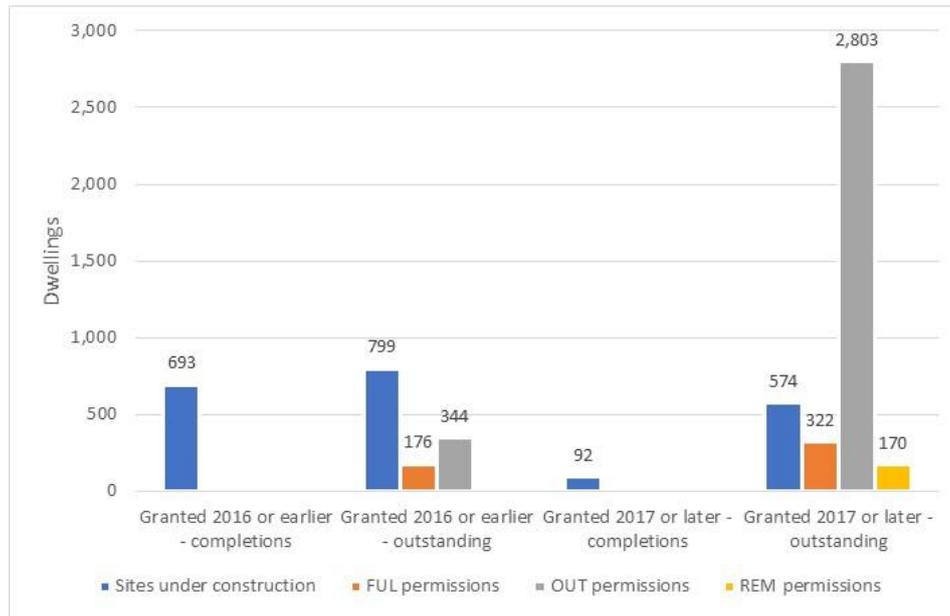
2.20 Figure 2.1 shows the split of major site completions and outstanding dwellings on sites under construction as at January 2019.

Figure 2.1: Dwelling completions on major sites under construction that were granted planning permission pre- and post-2017 – as at January 2019



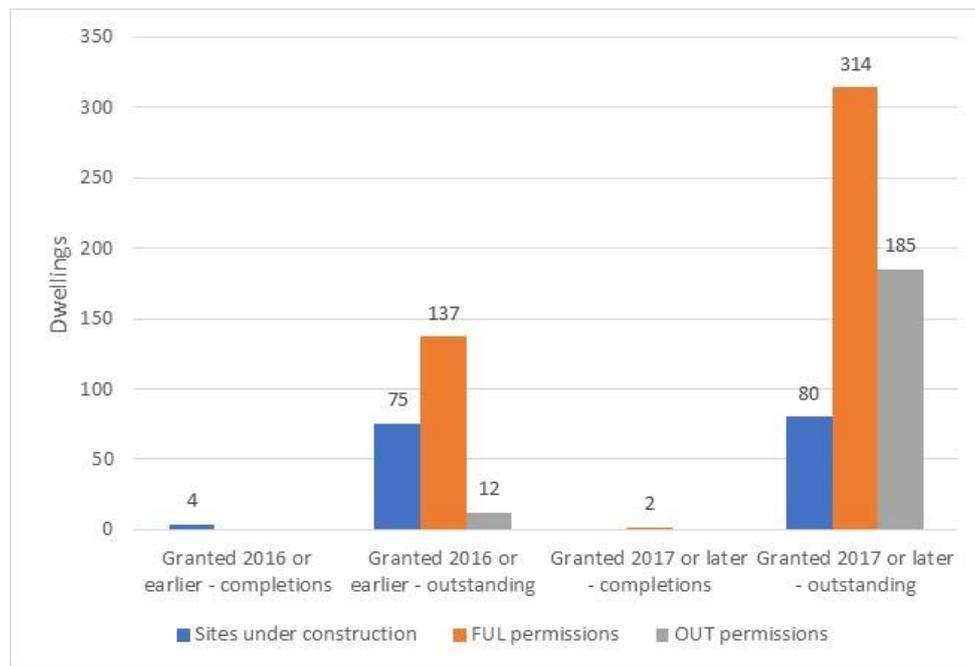
- 2.21 This shows that nearly 800 dwellings were granted planning permission at least three years ago but have not been completed. In other words, they have received full planning permission but the dwellings in question have not been built and/or registered as completions. By contrast, the equivalent figure for the number of dwellings that have full planning permission but have not been completed in the two-year period since 2017 is only 574 dwellings. Even though this figure is lower, it is worthy to note that the Letwin Review found that most major sites as defined in the review, i.e. more than 1,200 dwellings, moved from full detailed permission (i.e. either full planning permission or first reserved matters permission) to first completion within nine months. This should be set against the data informing Figure 2.1 which is that the 799 dwellings outstanding for at least three years are on four sites, representing an average site size of 200 dwellings. There is a similar profile for sites outstanding since 2017 – the 574 dwellings are on three sites, meaning an average site size of 191 dwellings.
- 2.22 Figure 2.1 shows that the pre-2016 sites have more dwellings outstanding than completed (693 dwellings). However, these 693 pre-2016 dwelling completions are on nine sites, representing an average site size of 77 dwellings, which is much smaller than pre-2016 sites with dwellings yet to be completed. There are five sites with dwellings completions since 2017 and these have delivered 92 dwellings, meaning an average of just over 18 dwellings per site.
- 2.23 This analysis suggests that whilst there are delays with a significant proportion of major sites, it is the largest of these where the delays are likely to be greatest, although this does not apply to all sites of this size, i.e. approximately 200 dwellings.
- 2.24 Figure 2.2 then shows the breakdown of dwellings on major sites which have planning permission but have not been completed.

Figure 2.2: Major sites with planning permission pre- and post-2017, January 2019



- 2.25 This shows that, of sites which were granted permission in 2016 or later, a total of 176 dwellings on six sites (average 29 dwellings) have full planning permission but have not been started and a further 344 dwellings on five sites (average 69 dwellings) have outline planning permission, but have not then had their reserved matters approved. It is noted that the average site size is larger for sites where outline planning permission has been sought compared with sites where full planning permission is sought. However, these 11 sites account for 520 dwellings outstanding for at least three years.
- 2.26 For dwellings on sites which have not completed since 2017, a high number – 2,803 dwellings on 30 sites (average 93 dwellings) have outline planning permission and a further 492 dwellings on 11 sites (average 45 dwellings) have either full planning permission or reserved matters approval. Many of these sites will have received this relatively recently so are not necessarily a concern in terms of delivery.
- 2.27 Figure 2.3 shows the equivalent data to Figure 2.2 for minor sites. This shows that there are 137 dwellings which have had full planning permission since 2016 but have not been completed and a further 12 dwellings that have had outline planning permission but have not been progressed in that time. For sites since 2017, the equivalent figures increase significantly to 314 dwellings with full planning permission and 185 dwellings with outline planning permission. However, again many of these may have received permission relatively recently.

Figure 2.3: Minor sites with planning permission pre- and post-2017, January 2019



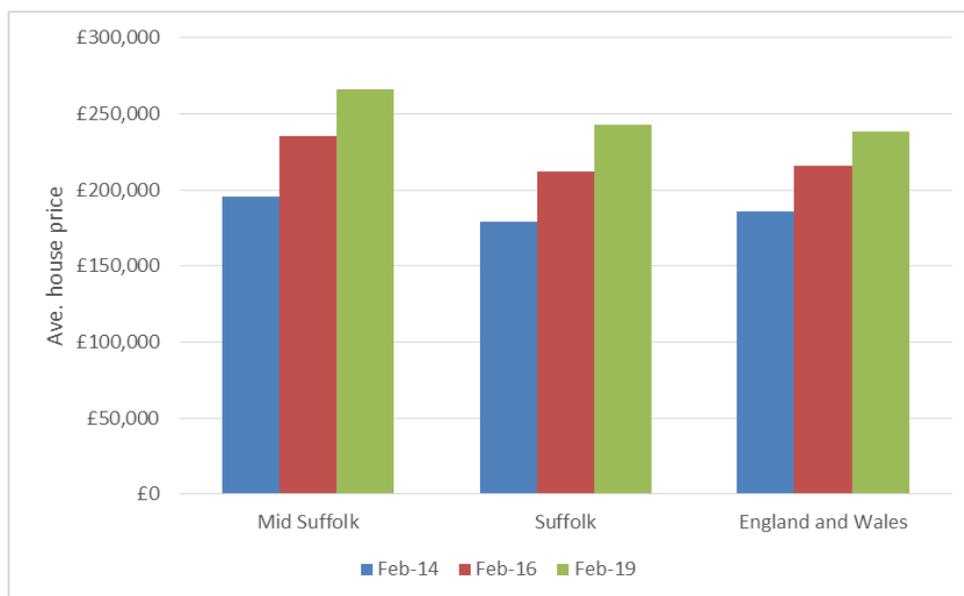
- 2.28 Whilst the issue of site delay is less pronounced for minor sites, there are still a number of dwellings – nearly 150 – that have not progressed to being built out over the last three years, despite having planning permission.
- 2.29 Analysis undertaken by Mid Suffolk to inform its 5-year housing land supply position as at the end of 2018/19 has shown that on a sample of 18 sites, the average lead-in time from submission of the first planning application to the first dwelling completion was 2.7 years, i.e. just over two years and eight months. Whilst therefore it would be more robust if such analysis had a larger sample size, an average lead-in time of 2.7 years is considered to be a reasonable benchmark for housing sites in Mid Suffolk. Indeed, this is in line with the national average period of 2.8 years.
- 2.30 National evidence on lead-in times has also been reviewed. Work was undertaken by Chamberlain Walker Economics, published in September 2017 and entitled ‘The Role of Land Pipelines in the UK Housebuilding Process’. This report looked at the supply of land required by housebuilders in order to maintain and grow the number of homes they build. It focused on sites of more than 20 dwellings and identified four phases of delivery from pre-application phase to delivery of first completions. The evidence concluded that on average sites of more than 20 dwellings take between 5.7 and 7.0 years to complete all four phases.
- 2.31 The Chamberlain Walker Economics, data published in September 2017 when analysing application to permission (e.g. inclusion of Local Plan, negotiating of S106, scale of development, performance of LPA) and from permission to start on site (e.g. landownership, ground works, site infrastructure, discharge of conditions) an average of between 2.2 and 2.5 years nationally, according to the Chamberlain Walker Economics work. This is slightly shorter than the average lead-in period in Mid Suffolk, which could

reflect the fact that the nationwide analysis undertaken by Chamberlain Walker Economics took into account fewer complex sites and/or sites in stronger markets. Nevertheless, the report notes that, since previous equivalent analysis was undertaken by the Local Government Association, the average time period for permission to start on site had increased to 1.7 years from a previous range of between 0.6 and 1.0 years. It was considered that this was likely to be the result of an increased issue of pre-commencement conditions, which is associated with the permission to start on site stage.

F. The Market and Housing Prices

- 2.32 The viability study³, which informed the development of the Mid Suffolk and Babergh CIL charges in 2014 noted that, whilst house prices had generally fluctuated in line with those across England and Wales as a whole, the average house price was consistently above the national average. This picture has continued since; in February 2019, the average house price in Mid Suffolk district was £265,886, compared with a national average price of £238,176. Moreover, Mid Suffolk is well above the county average for Suffolk, which stood at £243,215 in February 2019. Figure 2.4 shows how this picture has been consistent over the past five years.
- 2.33 Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly. This issue is important to land values, otherwise good sites are likely to stall in the latter stages when they are purchased by the developers that are ultimately going to be selling the housing units.

Figure 2.4: Average house prices, 2014-2019



Source Land Registry

³ Peter Brett Associates (2014) *Babergh & Mid Suffolk Community Infrastructure Levy Viability Study*, for Babergh and Mid Suffolk District Councils

- 2.34 Often it is the market conditions and who controls the site that will determine whether a site is developed or not or delayed. Evidence assembled by Chamberlain Walker Economics suggests that nationally over 55% of all planning permissions are held by non-builders. This is because of the way landownership works. This means sites held by non-builders have to be disposed of to a developer and so, for the landowner, a judgement needs to be made as to when to release their site onto the market. It is common local practice that sites are released to the market when they have outline planning permission, which allows a potential buyer the flexibility of submitting their own reserved matters applications which reflect the way they would wish the site to be developed. Many of these sites in Mid Suffolk which have outline planning permission, but have not had any reserved matters application submitted, are for sale but yet to attract a buyer.
- 2.35 In all cases the controlling interests of the site with either outline or full planning permission is the only party that can fully explain why a site has been delayed in moving from outline to reserved matters stage. Certainly, if sites are to be sold then there is likely to be at least a period of a few months of marketing, followed by a period when due diligence and legal work is carried out by a prospective buyer. Evidence shows where the time period that has elapsed is between ten and 12 months, these may not represent significantly stalled sites if they are sold soon and the new owners can complete the planning process and commence development promptly. However, if these sites continue to have no prospective buyers, the process of developing them out could be significantly elongated and therefore they could represent stalled sites.

G. Housing delivery in Mid Suffolk and current Mid Suffolk housing land supply position

- 2.36 In recent years Mid Suffolk District has experienced difficulty in consistently meeting the identified housing targets for the respective area. This has been highlighted by the national HDT result measurements (Feb 2019) and can be seen through previous annual monitoring reports, that identifies for Mid Suffolk 1274 homes were required 2015 – 2018. However, only 1035 were delivered in the same years.
- 2.37 That said the current published housing land supply position within Mid Suffolk is 5.06 years as evidenced within the Mid Suffolk Housing Land Supply Position Statement 2018/19 (March 2019).

H. Emerging Joint Local Plan and approach to growth

- 2.38 The Government have standardised the methodology for calculating local housing need as advised within the Planning Practice Guidance (housing and economic development needs assessment).
- 2.39 The emerging Joint Local Plan (JLP) between both Babergh and Mid Suffolk Districts is using a baseline of April 2018, with the Plan end date of March 2036 (18 years) to set the Local Authority housing need target within the

Ipswich Housing Market Area. Using the standard methodology, the local housing need for Mid Suffolk and the Ipswich Housing Market Area is as follows:

Local Authority Area	Standard Method Total (2018 – 2036)	Annual Local Housing Need Target
Mid Suffolk District	10,008	556
<i>Ipswich Housing Market Area</i>	35,334	1963

2.40 The Government’s standard methodology approach to local housing need is significantly higher (approximately 40%) than current levels of housing delivery, which creates challenges for the emerging JLP. The Councils proactive approach and strategy to growth is as follows:

- reviewing stalled planning permissions through a focused project;
- carrying out its own development through Mid Suffolk Growth property firm;
- ensuring that the emerging JLP aims to identify and create flexibility for more housing development across the district in the right locations; and
- identifying a buffer of approximately 20% in the supply of land for new housing up to 2036.

2.41 The spatial distribution of growth (through the Joint Local Plan) seeks to reduce the need to travel through good access to services and facilities. Mid Suffolk District will maintain its Ipswich fringe areas as historic strategic designations for growth, which recognises the cross-boundary influence of the Suffolk county town of Ipswich as a regional service centre. Also, sustainable urban areas and market towns will be allocated growth due to their significant service and facility provision. Core villages and all other settlements have been appropriately scored through a weighted scoring system due to their dispersed nature.

2.42 The planned spatial distribution that the Council are producing is mindful of the inherent market strengths within the area. The Council has sought to ensure that the most suitable and deliverable sites are proposed. In many instances this requires the complex alignment with infrastructure improvement programmes and investment to ensure sustainable growth.

2.43 High house prices (and low average wages/salaries) across Mid Suffolk mean that it is difficult for people to purchase or rent a house on the open market. Therefore, appropriate size, type and tenure of affordable housing are key factors to success across the whole of the district.

2.44 The transport corridors of the A12, A14 and mainline railway lines represent a strong effect upon market forces and the demand for housing. Compatible growth along these areas can reduce the need to travel or encourage sustainable travel due to access to public transport.

- 2.45 A significant number of Neighbourhood Plans (NP) are emerging throughout the Local Plan area, with a range of local issues and objectives being planned for. The District Council is drafting minimum housing requirement figures for these areas to assist the NP groups.
- 2.46 The emerging JLP for both Babergh and Mid Suffolk Districts is currently at Regulation 18 stage. The emerging JLP has already been through a previous Regulation 18 consultation back in August 2017. Due to the number of consultation responses received at that time in combination with a number of service area changes, and changes to National Planning Policy Framework, it is considered appropriate and necessary to undertake a further Regulation 18 consultation stage. This will take place in the summer 2019.

I. Community Infrastructure Levy and Viability

- 2.47 Work to update Mid Suffolk Community Infrastructure Levy (CIL) evidence base is being undertaken concurrently with the Housing Delivery Test Action Plan work. The purpose of this CIL review work is to update the study undertaken in 2014 which informed the development of the CIL charge which was subsequently brought into force in April 2016. It provided an assessment of the viability of different types of development across Mid Suffolk district and its ability to support a CIL charge without undermining the viability of development.
- 2.48 At this stage in the viability work, it is understood that there have been no material changes in circumstances since 2014 in terms of the viability of residential development across the district. Generally, the market for residential development is reasonable, but is susceptible to issues on difficult sites and sites with abnormal costs. However, there is nothing to suggest a more widespread structural problem which is causing sites to stall. Minor sites – of less than ten dwellings – have generally been delivered more consistently than major sites. It is considered that this is because most of these sites are in rural, village locations where values are higher and the size of the sites mean there are fewer issues that could cause a delay because of viability issues.
- 2.49 When the CIL was brought into effect in April 2016, this required development to make a non-negotiable payment towards district-wide infrastructure provision. The payment required is based on the size, location and type of development. In the majority of Mid Suffolk district, new housing development is required to pay £115 per square metre (psm) + indexation on net additional floorspace, excluding affordable housing.
- 2.50 Simultaneous to this Mid Suffolk brought into force the CIL payment plan schedule, which is available on the Council's website⁴ detailing CIL liability.
- 2.51 It is important that Mid Suffolk continues to closely monitor progress with the build-out of sites and to engage with developers in order to better understand the common types of issues which delay commencement once a site is

⁴ Link to CIL payment schedule: <https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/MSDC-instalments-policy-Jan-2016.pdf>

'shovel-ready'. In particular, it could be a clearly stated intention of the Council to engage with all developers of sites with planning permission where there is only 12 months to run before the permission expires. The purpose of the engagement process will be to try to understand what is needed to ensure that the permission gets built out and what the Council can do to support this.

J. Root Cause Analysis (Key Issues and Challenges)

- 2.52 There is a strong and compelling vision, aim and set of objectives running through Mid Suffolk District Council regarding housing delivery. This is to improve and achieve housing delivery, from a corporate level right through to a strategic planning and local community level.
- 2.53 A broad range of evidence has been sought by the Council and collaboration from key stakeholders has been undertaken for the housing supply process and to better understand what the key issues and challenges are that influence and create low delivery rates. The database has been created alongside direct knowledge of local sites, land and development activity. Market intelligence has been undertaken to understand the reasons for housing sites stalling.
- 2.54 Site samples have been used as the method to establish key issues and challenges in housing delivery within Mid Suffolk. The key issues and challenges that have emerged from this data analysis are as follows and have been set out in to the following three key issue areas (early stallers, condition stallers and late-stage stallers):
- 2.55 **Issue 1: Early Stallers – are sites that have yet to receive full planning permission when a planning application – either full or outline – has been submitted.**

Time Period

- I. The time period from submission of the first planning application to full planning permission⁵ has been 18 months (1.5 years), which is significantly higher than the national average (approx. ten months).

Number of outline permissions

- II. There are a number of outline planning permissions that have not moved to the reserved matters stage after ten months with unclear reasons as to why. Such reasons could be either a reserved matters application is being prepared, pre-application engagement by the promoter in respect of reserved matters or clear assurance from the promoter about the intention to proceed. It is clear there are outline planning permissions that may be delayed due to being sold on.

⁵ This could either have been through a single, full application or through an initial outline application followed by a reserved matters application.

Speculative permissions and Controlling interests

- III. A number of planning permission are speculative planning permissions. The evidence has identified that some sites are under controlling interests such as property investment companies being held on to, also known as 'banking', sold or bought. The market conditions determine what the control of property investment companies chose to do with the site, which in succession can often determine what potential buyers chose to do as well. With any degree of uncertainty often the approach of sellers and buyers is to wait and see what happens to the market over the short-term.

2.56 **Issue 2: Condition Stallers** – are sites which are in the period between the grant of full planning permission and all conditions having been discharged, i.e. being able to start on site.

Difficulties in discharging conditions

- I. There are difficulties in discharging conditions on planning applications. Analysis of such sites show it is often the case the sites are landowner-led, property development company or national housebuilder. Therefore, the reasons are likely to be different in each case, but are likely to be in relation to the following:
- Sites controlled by housebuilder where the site could be developed without the need to be sold first. One of the sampled sites has recently applied to reduce the level of affordable housing provision as part of the scheme, suggesting that viability has changed since the site was initially taken through the planning process.
 - Sites being taken forward by the landowner, but permission has expired. This suggests that the landowner may have changed their mind about development - such decisions could be argued to be more likely when led by a private landowner compared with if they are led by a developer or property company that is solely in the business of developing or selling sites.
 - Sites under the control of a property company.

Financial viability

- II. Financial viability is often a primary driver. 2016 research published on stalled residential sites in England⁶ reviewed a range of site typologies in different parts of the country from the point at which they were 'shovel ready', i.e. they were able to commence construction on site, the nature of the research can clearly be applied to sites which are almost shovel-ready, i.e. only have conditions to be discharged. What this research found was that whilst financial viability is likely to be a primary driver of site stalling, the reasons for stalling are often more nuanced. Housebuilders need to maintain an inventory of sites in order to manage their workflow although they account for a relatively small proportion of stalled sites. Other landowners seem to be exercising their options to delay the sale of their sites. As the research notes, "Essentially, owners' decisions on whether to sell a site to a developer are analysed in terms of weighing the opportunity costs of keeping their site vacant against

⁶ McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, Planning Practice and Research, 31 (2). pp. 132-153.

the expected gain from delaying sale until more favourable market conditions prevail.” There are at least two sites in Mid Suffolk that potentially illustrates this process playing out. This also coincides with the knowledge that some developers have described their ‘sell-to-build’ business model in which they must sell a unit in order to finance the building of another unit. This means build out of the whole scheme could be slow or stall completely depending on the market conditions and financial viability.

2.57 **Issue 3: Late-stage Stallers** – are sites which have reached the point when construction may commence, i.e. there are no further administrative requirements to be met.

Financial viability

- I. As with Issue 2 – condition stalling (above) financial viability is also an issue for late-stage stalled sites. The 2016 research on stalled residential sites in England⁷ found that financial viability is likely to be a primary driver of site stalling, particularly in lower value house areas. It notes: “The overarching shifts are that house values have fallen in many areas, developers’ and lenders’ risk aversion has increased and, as a result, once viable financially feasible projects are no longer feasible. At current market prices and taking into account development costs, housing development is not viable on a substantial proportion of what is often defined as housing land supply.”

Realistic pricing

- II. Evidence shows earlier in this document house prices in Mid Suffolk have generally been consistent market strength over the past five years. Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly.

Site commencement

- III. It has also been recognised through development management collaborative work in relation to infrastructure planning, community infrastructure levy work and housing land supply work some sites commence in order to keep the planning permission live, but there is no immediate intention to build out the site. The exact reason is not known, but on the balance of probability it is expected to be due to market conditions and finances which would be involved. Ultimately it is only the applicant/landowner/site promoter who can clearly explain the reasons why their individual site is delayed.

Alternative permissions

- IV. Some sites are known to have benefit from a number of alternative permissions. This could be a full planning permission, after an initial outline or a subsequent section 73 or a Minor Material Amendment (MMA) or Non Material Amendment (NMA), especially if there has been a change of owner since the original planning permission was granted.

⁷ McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, Planning Practice and Research, 31 (2). pp. 132-153.

K. General Conclusions

- 2.58 The data and evidence show there are three key issues (as detailed above) as to why there is some delayed delivery of housing development within Mid Suffolk. In drawing conclusions from the identified key issues, it is apparent these focus around **land speculation**, which includes the business of developing or selling sites, **controlling interests** and **market conditions**, which are often the main areas beyond the Local Planning Authorities ability to control to manage. However, it also requires the private sector to deliver on planning permissions and requires communication between stakeholders and the Council, with transparency for understanding.

3. Key Actions and Responses

- 3.1 This Mid Suffolk Housing Delivery Test Action Plan focuses on the timely delivery of new housing by setting out a range of practical, proportionate and proactive measures. This is to address low housing delivery rates, which will be monitored and reviewed.
- 3.2 The Joint Strategic Plan (2016 – 2020) recognises strategic outcomes, which includes housing delivery can only really be achieved through collaboration. As part of the corporate plan housing is a priority where continued focus and efforts will be sustained. The vision for housing priority is to ensure more of the right type of homes, of the right tenure in the right location. This vision is very firmly fixed in achieving sustainable development not development at any cost to the detriment of other necessary considerations.
- 3.3 The solutions below are the actions proposed in response to the identified key issues and challenges (early staller, condition staller and late-stage staller) mentioned earlier in this Action Plan.

A. Solution 1: Early Stallers:

- I. **Engage regularly with the site promoters of ‘Early Staller’ sites** – more generally as part of this engagement, and as part of an ongoing relationship with site promoters. It will be important to understand, in a Mid Suffolk district context, how decisions are made about whether to sell a site once it has received outline planning permission or whether to seek reserved matters approval before selling the site. This will help to build up possible typologies of sites, which will form part of the monitoring process.
- II. **Memorandum of Understanding on Deliverability** – where necessary and prepared by two parties to address issues of deliverability in respect of the development at a particular site.
- III. **Update Mid Suffolk’s local list of information required to support a planning application** – so that it includes a requirement for major outline planning applications (where all or most matters are reserved) to provide information regarding timescales and build out rates for the scheme. This will need to be proactively supported by case officers to ensure that the

information submitted is reasonable. For example, requests for viability requirements, timescales, build-out rates from applicants/agents to demonstrate a reasonable prospect for the site, if acceptable, will be developed and delivered.

B. Solution 2: Condition Stallers:

- I. **Providing a checklist and a sample of ‘model’ information for different conditions** in order to proactively assist applicants/agents by ensuring that they are clear about the level and type of information needed to enable the discharge of condition. Ongoing dialogue between the local planning authority and consultees/agents/developers is taking place to aid the process of discharging conditions and manage expectations. To ensure clear understanding between all of what type of condition is necessary and how the condition is to be worded and discharge is also clear. This in theory should help speed the discharge of conditions process up between information submissions, validation and discharge.

C. Solution 3: Late-stage Stallers:

- I. **Continue to closely monitor progress** with the build-out of sites and engage with developers in order to better understand the common types of issues which delay commencement once a site is ‘shovel-ready’.
- II. **Engage with all developers of sites with planning permission where there is only 12 months** to run before the permission expires. Try to understand what is needed to ensure that the permission gets built out.

D. General recommendations:

- 3.4 The data⁸ has demonstrated that there are some common themes in the consideration of when and why sites stall. Consequently, three typologies of stalling have been identified and the following recommendations are made. It is also important to note the identified solutions and general recommendations directly interlink with the priorities of the Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan), the emerging Joint Local Plan (Strategic planning) and the Homes and Housing Strategy 2019 – 2024, meaning the overall vision, function and delivery priorities are aligned within the organisation.
 - I. Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out). The meeting should be an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.

⁸ Mid Suffolk Stalled Sites Market Intelligence report (May 2019)

- II. Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships. This could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.
 - III. Given that it has been in place for over three years, it has had time to bed in and therefore applicants should be familiar with it and have a good appreciation of any issues it has created. This should be part of a greater willingness to have a more open conversation with regular promoters, investors and developers in Mid Suffolk.
 - IV. As part of this conversation, seek to understand more about how the planning process (and any delays, perceived or real) affects decisions over land options.
 - V. More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).
- 3.5 Added to the above it is important to include in this Action Plan recommendations for improving housing delivery contained in the Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024. These are as follows: -
- Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.
 - Ensuring a smarter and improved pre-application process.
 - Ensuring applications are approved on time and Section 106 agreements are signed off promptly.
 - Discharging planning conditions promptly to ensure development can commence.
 - Viability testing of proposed land allocations at plan making stage.
 - Reviewing stalled sites to ensure blockages and delays to development are resolved.
 - Creating a flexible approach to tenure mix to accelerate delivery.
 - Developing new private homes through Council owned housing companies.
 - Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.
 - Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.
 - Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.

- Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.
- Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).
- Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.
- Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.

3.6 It is apparent the progress and success of housing delivery is a collaborative process between both the public and private sector and communities. It is recognised Mid Suffolk District Council is undertaking a number of steps and measures as seen from the solutions and general recommendations earlier for delivery to be achieved. But, in reviewing all data and issues it is apparent Mid Suffolk Council plays a small but influential part in the delivery success process. The Council can continue to add value to the process by monitoring, reviewing and continuing engagement, measuring progress through this Housing Delivery Test Action Plan and any other relevant monitoring document.

4. Monitor, Review and Performance

4.1 This Action Plan will be reviewed and updated on an annual basis as part of the Council's joint annual monitoring report process and alongside the review of the Council's overarching Joint Homes and Housing Strategy.

4.2 The implementation of the identified actions will require collaboration across Council services areas and this Action Plan is to be recommended for adoption by Mid Suffolk District Council at Full Council.

4.3 The table below sets out how the actions together with timescales.

	Measure	Objective	Intervention Activity and Status	Timescale
1	Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.	Providing clarity and certainty through the provision of a Joint Local Plan comprising development policies including those providing for land allocations together with a sound and evidenced Infrastructure	Work in progress.	Public consultation on the next version of the emerging Joint Local Plan anticipated in Summer 2019.

		Delivery Plan.		
2	Ensuring a smarter and improved pre-application process.	Getting our pre-application process right first time such that application decision is consistent with pre application advice.	New revised scheme in place and being monitored.	Presentation of report to both Councils Cabinet in respect of revisions to existing scheme in March 2019. Continued monitoring subsequently to ensure that scheme is effective.
3	Ensuring applications are approved on time and Section 106 agreements are signed off promptly.	No delay to planning application determination.	Work in progress.	Ongoing and publication of statistics to confirm performance and outcomes.
4	Discharging planning conditions promptly to ensure development can commence.	No delays in the discharge of planning conditions.	Action Plan to be devised agreed and implemented to achieve outcome.	Ongoing and active monitoring in place but action plan needed given feedback to the Consultant for the Housing Delivery Action Plan/Unblocking stalled site project to achieve desired outcome.
5	Viability testing of proposed land allocations at plan making stage.	Appointment of Consultants who are reviewing the draft charging regime for Community Infrastructure Levy (CIL) together with the Infrastructure requirements of each land allocations to ensure that all site allocations are viable and therefore deliverable.	Work in progress.	To meet the Joint Local Plan and Infrastructure Delivery Plan timetable as set out above.

6	Reviewing stalled sites to ensure blockages and delays to development are resolved.	Development of a database and an approach to unblocking stalled sites. Production of a report which outlines intelligence around the housing market which will provide a foundation for the Strategy and which will comprise the Councils Housing Delivery Test Action Plans.	Work in progress.	Project work commenced with an amended Brief in December 2018 and with a completion date of end of May/ early June 2019.
7	Creating a flexible approach to tenure mix to accelerate delivery.	Production and adoption of Affordable Housing SPD linked to adoption of Joint Local Plan. Inclusive of guidance on Community-led housing, and specialist housing provision.	Action Plan required.	Timetable dependent upon progress of the JLP. To be reviewed when JLP timescale confirmed.
8	Developing new private homes through Council owned housing companies.	A programme to deliver 414 homes for the Councils' own affordable homes programme has been devised. Approx. 300 of these will be new build.	Work in progress.	3-5 year rolling programme has been devised.
9	Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.	Ensure the delivery of the Affordable Homes Programme has the resources to deliver at speed. Aim to maximise the level of grants from various pots to ensure that the homes can be	Action Plan in place.	3-5 year rolling programme has been devised.

		subsidised and therefore let at an affordable /social rent. We will maximise the use of our own land/assets. We will engage with planners and consultants at an early stage to help increase the speed of delivery.		
10	Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.	Strategic Housing Team will liaise regularly with Homes England to maximise Affordable Housing Programme investment into both Council areas.	Action plan required.	Obtain figures for each financial year and summarise at the end of each Homes England funding programme to Members. Apply for Community Housing Fund prior to December 2019.
11	Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.	Increase supply and delivery against assessed needs. Identification of needs data will assist in attracting delivery partners to provide a purpose-built scheme.	Action Plan required.	Plan for specific needs on a 3-year rolling programme in conjunction with commissioning partners.
12	Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.	Investigate using these powers as part of the Strategy for unblocking stalled sites where circumstances dictate that this is an appropriate measure.	Work to be competed when appropriate and needed on a case by case basis.	Not a 'fixed' time piece of work. Circumstances of each case would determine whether there is a need to investigate further, consider use of Compulsory Purchase Order powers, then

				instigate and monitor. Ongoing.
13	Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).	Better engagement with Homes England should re-assure them of our councils' ambitions with regards to our own direct delivery. By giving confidence of delivery we are more likely to receive grant funding. By being clear on our programme and borrowing requirements gives the Development Team the chance to respond to opportunities available at short notice from developers.	Work in progress.	Ongoing.
14	Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.	Continue to use the Community Housing Fund allocation from 2017 to support our communities to develop community-led housing initiatives. We will ensure the JLP includes policies which favours community-led housing. We will assist community groups to make applications to Homes England for Community Housing Fund grant in 2019.	Work in progress.	By the end of 2020/21 to have successfully funded the setting up of additional CLT's across the two districts.

15	Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.	To secure good working relationships with new partners to secure more certainty around affordable housing delivery. Encourage all partners to invest in our communities and secure new schemes.	Action Plan required.	By December 2019 for feasibility work. April 2020 to secure two suitable sites for pilot schemes.
16	Early Stallers (i) Engage regularly with the site promoters of “early staller sites”. (ii) Secure memorandums of understanding on deliverability. (iii) Update Local List of information required to support a planning application.	Focused engagement, enhanced processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
17	Condition stallers (i) Provide a checklist and a sample of “model” information for different conditions.	Focused processes to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
18	Late stallers (i) Continue to monitor build out of sites. (ii) Engage with developers of all sites with planning permission where there is only 12 months to run before the permission expires.	Focused engagement processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
19	Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out).	Improved engagement with an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
20	Develop a framework for engaging on a more regular basis (than	Improved engagement which could be	Action Plan to implement this measure will be	Prior to the annual review of this Housing Delivery

	annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships.	part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.	required.	Test Action Plan.
21	Undertake a survey of key market stakeholders on attitudes to CIL, particularly among major site promoters. In particular, this should seek to understand what impact the CIL charge is having.	Better engagement and an opportunity to consider responses as part of the current CIL Review.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan and as part of the current CIL Review which is occurring alongside the Joint Local Plan.
22	As part of the engagement process with stakeholder gain further detailed information about how the planning process (and any delays perceived or real) affects decisions over land options.	Better engagement and an opportunity to consider responses as part of the Review to this Housing Delivery Test Action Plan.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
23	More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).	Better engagement to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.

4.4 A thorough review of this annually will include updating of data, housing delivery performance figures from all sources, any changes to market intelligence and an analysis of outcomes and achievements in respect of all actions reviewed

5. References

5.1 The following data has been used in this document:

- Mid Suffolk stalled sites database (June 2019) and summary
- Mid Suffolk Stalled Sites Market Intelligence report (May 2019)
- Mid Suffolk Housing Land Supply Position Statement 2018/19 (March 2019)
- Babergh & Mid Suffolk Joint Annual Monitoring Reports 2015 – 2018
- Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan)
- Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024

6. Appendix 1

6.1 The appendix to this document comprises the summary of the Council's Stalled sites database (June 2019).

A. Methodology used for database construction

6.2 In order to construct a database the following premise was used:

A development site which has all the necessary approvals for housing development (full planning permission, reserved matters approval, conditions discharged) but for whatever reason has not yet commenced on site and is therefore categorised as stalled.

6.3 Current position on working database:

A site can be stalled at different stages of its progress through the planning process phases, such as: -

- a. 'Early staller': Before full planning permission is granted
- b. 'Conditions staller': The period between the grant of full planning permission and all conditions having been discharged, i.e. ready for construction
- c. 'Late-stage staller': After the point at which construction can commence

6.4 For the purpose of this exercise, the planning process is broken down into 3 phases:

Phase 1 - Outline Planning Permission to Full Planning Permission or Reserved Matters

Phase 2 - Full Planning Permission or Reserved Matters to all pre-commencement conditions being discharged

Phase 3 - Under construction to completion

6.5 At each phase, a site could be assessed as stalled, after a timeframe which is deemed reasonable for progression from one phase to the next. At each phase, a "reason" for the site to be stalled has been devised to establish a stalled site category, such as:

At phase 1:

- A) No detailed permissions to enable a commencement to occur.
- B) Site for sale or in process of being sold.

At phase 2:

- A) No known condition discharge.
- B) Condition discharge occurring, yet no start date planned.
- C) Condition discharge occurring, and planned start on site but no start yet.
- D) No known condition discharge due to known impediments for commencement.
- E) No known condition discharge as site for sale or in process of being sold.

At phase 3:

- A) Work has started on site, however development has stopped/stalled.
- B) Construction progressing – monitoring only.

B. Table 1: Summary of number of Planning Permissions and dwellings permitted by typology – May 2019

		Phase 1: Early stallers		Phase 2: Condition stallers					Phase 3: Late-stage stallers		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Mid Suffolk	Number of Sites	31	2	11	8	-	1	1	1	22	77
	Number of Dwellings	1,931	66	1,099	1,079*	-	74	10	13	1,952	6,224

*Please note: Land North of Chilton Leys, Chilton Leys, Stowmarket total of 600 dwellings under outline, 175 dwellings under Reserved Matters.

APPENDIX F - BABERGH

Unblocking stalled sites project

Defining a stalled site

In order to construct a database the following premise was used:

A development site which has all the necessary approvals for housing development (full planning permission, reserved matters approval, conditions discharged) but for what ever reason has not yet commenced on site and is therefore categorised as stalled.

Current position on working database:

A site can be stalled at different stages of its progress through the planning process phases, such as: -

- a. 'Early stallers': Before full planning permission is granted
- b. 'Conditions stallers': The period between the grant of full planning permission and all conditions having been discharged, i.e. ready for construction
- c. 'Late-stage stallers': After the point at which construction can commence

The matrix shown in Table 2 below, aims to provide a better understanding of the nature and causes of stalled projects. Whilst a further exercise summarised in Table 3 aims to provide an understanding of the type of stalled sites, in relation to their location and whether they are in a high or low value area.

For the purpose of this exercise, the planning process is broken down into 3 phases:

Phase 1 - Outline Planning Permission to Full Planning Permission or Reserved Matters

Phase 2 - Full Planning Permission or Reserved Matters to all pre-commencement conditions being discharged

Phase 3 - Under construction to completion

At each phase, a site could be assessed as stalled, after a timeframe which is deemed reasonable for progression from one phase to the next. At each phase, a "reason" for the site to be stalled has been devised to establish a stalled site category, such as:

At phase 1:

- A) No detailed permissions to enable a commencement to occur
- B) Site for sale or in process of being sold

At phase 2:

- A) No known condition discharge
- B) Condition discharge occurring, yet no start date planned
- C) Condition discharge occurring, and planned start on site but no start yet
- D) No known condition discharge due to known impediments for commencement
- E) No known condition discharge as site for sale or in process of being sold

At phase 3:

- A) Work has started on site, however development has stopped/stalled
- B) Construction progressing – monitoring only

Table 1: Summary of number of Outstanding Planning Permissions and number of dwellings in each category – as of 07/02/2020

		Phase 1		Phase 2					Phase 3		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Babergh	Number of Sites	10	4	13	8	-	-	1	1	20	57
	Number of dwellings	1728	203	666	680	-	-	14	131	1326*	4748

*Please note: Sproughton, Hybrid permission (B/15/00993) for Wolsey Grange is for 620 dwellings, 145 (RM) and 475 (OUT).

Table 1: Summary of number of Outstanding Planning Permissions and number of dwellings in each category – as of 31/07/2020

		Phase 1		Phase 2					Phase 3		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Babergh	Number of Sites	12	3	15	4	2	-	1	1	24	62
	Number of dwellings	1870	103	593	63	457	-	14	131	1458*	4689

*Please note: Sproughton, Hybrid permission (B/15/00993) for Wolsey Grange is for 620 dwellings, 145 (RM) and 475 (OUT).

APPENDIX G - MID SUFFOLK

Unblocking stalled sites project

Defining a stalled site

In order to construct a database the following premise was used:

A development site which has all the necessary approvals for housing development (full planning permission, reserved matters approval, conditions discharged) but for what ever reason has not yet commenced on site and is therefore categorised as stalled.

Current position on working database:

A site can be stalled at different stages of its progress through the planning process phases, such as: -

- a. 'Early stallers': Before full planning permission is granted
- b. 'Conditions stallers': The period between the grant of full planning permission and all conditions having been discharged, i.e. ready for construction
- c. 'Late-stage stallers': After the point at which construction can commence

The matrix shown in Table 2 below, aims to provide a better understanding of the nature and causes of stalled projects. Whilst a further exercise summarised in Table 3 aims to provide an understanding of the type of stalled sites, in relation to their location and whether they are in a high or low value area.

For the purpose of this exercise, the planning process is broken down into 3 phases:

Phase 1 - Outline Planning Permission to Full Planning Permission or Reserved Matters

Phase 2 - Full Planning Permission or Reserved Matters to all pre-commencement conditions being discharged

Phase 3 - Under construction to completion

At each phase, a site could be assessed as stalled, after a timeframe which is deemed reasonable for progression from one phase to the next. At each phase, a "reason" for the site to be stalled has been devised to establish a stalled site category, such as:

At phase 1:

- A) No detailed permissions to enable a commencement to occur
- B) Site for sale or in process of being sold

At phase 2:

- A) No known condition discharge
- B) Condition discharge occurring, yet no start date planned
- C) Condition discharge occurring, and planned start on site but no start yet
- D) No known condition discharge due to known impediments for commencement
- E) No known condition discharge as site for sale or in process of being sold

At phase 3:

- A) Work has started on site, however development has stopped/stalled
- B) Construction progressing – monitoring only

Table 1: Summary of number of Outstanding Planning Permissions and number of dwellings in each category – as of 05/02/2020

		Phase 1		Phase 2					Phase 3		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Mid Suffolk	Number of Sites	43	2	16	6	-	-	2	1	28	98
	Number of dwellings	2620	66	749	430	-	-	78	13	3400*	7356

*Please note: Land North of Chilton Leys, Chilton Leys, Stowmarket total of 600 dwellings under outline, 175 dwellings under Reserved Matter that are under construction.

Table 1: Summary of number of Outstanding Planning Permissions and number of dwellings in each category – as of 31/07/2020

		Phase 1		Phase 2					Phase 3		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Mid Suffolk	Number of Sites	40	2	19	3	-	-	2	1	33	100
	Number of dwellings	2395	66	924	36	-	-	78	13	3607*	7119

*Please note: Land North of Chilton Leys, Chilton Leys, Stowmarket total of 600 dwellings under outline, 175 dwellings under Reserved Matter that are under construction.

Agenda Item 9

BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

TO: Joint Overview and Scrutiny Committee	REPORT NUMBER: XXXX
FROM: Councillors Jan Osborne and Julie Flatman - Cabinet Members For Housing	DATE OF MEETING: 21 SEP 2020
OFFICER: Heather Tucker, Corporate Manager – Housing Solutions	KEY DECISION REF NO. Item No.

ANNUAL REVIEW OF THE JOINT HOMES AND HOUSING STRATEGY AND HOMELESSNESS REDUCTION AND ROUGH SLEEPING REDUCTION STRATEGY, 2019-2024

1. PURPOSE OF REPORT

- 1.1 In March 2019, both councils unanimously adopted a Joint Homes and Housing Strategy, setting out the councils' vision 'for residents to live in affordable and high-quality homes that enable them to build settled, safe and healthy lives, within sustainable and thriving communities.' At the same time, alongside and as part of the Homes and Housing Strategy, the councils also adopted a Homelessness Reduction and Rough Sleeping Strategy.
- 1.2 Both strategies cover the period 2019-2024.
- 1.3 These strategies commit us to be open and transparent, providing information on how we are performing against plans. So as part of adoption, a commitment was made to report back to Overview and Scrutiny Committee for an annual review and update to members.
- 1.4 The review planned for April was postponed due to the COVID-19 pandemic response and deferred to this meeting. This paper sets out progress made in delivering the adopted strategy to enable members to scrutinise the work undertaken by the councils.

2. OPTIONS CONSIDERED

- 2.1 Given that members established an approach to review in 2019, no alternative options have been considered.

3. RECOMMENDATIONS

- 3.1 That members review and note the contents of this report and appendices, along with verbal contributions.
- 3.2 On the basis of this report, members are requested to make further recommendations and observations as appropriate, linked to the ongoing

implementation of the Homes and Housing and Homelessness Reduction and Rough Sleeping Strategies.

REASON FOR DECISION

To scrutinise the progress made towards delivering the objectives of the Joint Homes and Housing Strategy and the Homelessness Reduction and Rough Sleeping Strategy, with the objective of improving performance in delivering housing objectives.

4. KEY INFORMATION

4.1 The Joint Homes and Housing Strategy sets out a vision for Babergh and Mid Suffolk, (stated above at 1.1). To achieve this Vision, nine strategic aims were agreed to underpin delivery and set out key priorities. The Action Plan is organised to deliver these nine strategic aims:

- (i) The housing market functions effectively, providing homes which are as affordable as possible; to meet the needs of residents and support the local economy.
- (ii) There is a wide and varied choice of good quality, sustainable homes of different sizes, types and tenures, to meet the needs of a wide range of different households.
- (iii) Homelessness is prevented and our services provide positive and planned interventions.
- (iv) Babergh and Mid Suffolk is an effective social landlord known for delivering quality services
- (v) Homes are in high quality sustainable environments, served by jobs and community facilities, appropriate green space, effective transport links and other necessary infrastructure.
- (vi) Best use is made of private sector land and private accommodation across the Districts
- (vii) People live in vibrant and well-connected communities; and homes and communities continue to meet the changing needs of residents.
- (viii) Everyone has a suitable home, and residents are able to live as healthily, safely, independently as possible within sustainable communities.
- (ix) Both Councils have a strong relationship with residents, developers and other partners that enable us to deliver housing, infrastructure and services effectively, and to innovate where appropriate.

4.2 The Action Plan endorsed by members in 2019 included 112 actions. A comprehensive update, including a high-level summary of work undertaken, work underway and work yet to commence will be presented at the Joint Overview and Scrutiny Meeting.

- 4.3 A Project Board has been developed to oversee the delivery of the strategies, and ensure progress continues to be made. Its membership includes managers and senior officers from different teams across the Councils, who have a key role to play in successfully implementing the strategies, which is chaired by the Corporate Manager for Housing Solutions.
- 4.4 The Project Board has made a series of changes to the Action Plan, considering changing circumstances and priorities. These changes have been implemented under the delegated powers of the Assistant Director, Housing and the Cabinet Members for Housing. The number of actions has been reduced to 93 by amalgamating some actions where there were synergies or duplication, whilst maintaining the priorities established by members. In order to aid delivery, actions have been reordered and framed according to 'SMART' principles.

5. LINKS TO CORPORATE PLAN

- 5.1 Housing is a strategic priority in the Corporate Plan. Clearly, these housing and homelessness strategies are a key means of prioritising our housing activity under the Corporate Plan.
- 5.2 Furthermore, the vision and objectives of the Homes and Housing Strategy seek to support other economic, social and environmental outcomes.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no financial implications arising from the scrutiny of the Homes and Housing Strategy and Homelessness Reduction and Rough Sleeping Strategy, other than ongoing nominal costs arising from the delivery of the strategy. These will be considered individually as part of a business case but are normally within existing budget provision.

7. LEGAL IMPLICATIONS

- 7.1 It is not a statutory requirement to publish a Housing Strategy and there are no legal implications of producing and implementing the Homes and Housing Strategy, although some actions carried out under the strategy relate to statutory duties of the councils. In these instances, statutory outcomes are considered though the implementation of that task.
- 7.2 It is a statutory requirement to publish a Homelessness Reduction Strategy and to review the strategy every five years (due in 2024).

8. RISK MANAGEMENT

- 8.1 Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
Delays to the adoption of the Joint Local Plan. Several Housing Strategy actions and objectives are dependent on the JLP for implementation	2	3	Careful programme management of the JLP

Major change in state of UK property and development markets. Fluctuations in the housing / land markets are envisaged to impact on housing delivery and viability; also on our ability to make decisions if evidence base is shifting.	3	4	Limited opportunity to manage. Need to be flexible and responsive to changing circumstances.
Poor relationships with RPs / Homes England. Several actions are dependent on co-operation of these key partners.	1	3	Regular engagement (as per strategy actions)
Lack of resources to implement strategy (staff and financial) Many actions are in addition to 'the day job' and resources have not yet been identified for implementation	3	4	Everyone involved needs to take responsibility for the successful delivery of these strategies. They will be included in individual Service Plans and Team / Officers Objectives.
Lack of alignment between corporate strategies / implementation plans	2	3	Extensive engagement between teams and supervision by SLT
Lack of outside support from partners, e.g. Suffolk County Council	3	3	High level engagement via Suffolk Housing Board
Unforeseen outside pressures / changes in statutory requirements. E.g. COVID, which is already creating challenges and opportunities	3	4	Limited opportunity to manage. Likely need for flexibility.

9. CONSULTATIONS

9.1 Consultation occurred through stakeholder engagement during the development of the Joint Homes and Housing Strategy 2019-24; this included Cabinet Leads for Housing and the Council Leaders together with developers, land agents, estate agents and key local people involved in housing delivery. In addition, the Councils appointed a local Consultant skilled in housing delivery to provide key information in relation to housing market intelligence together using local data from the Councils' database.

10. EQUALITY ANALYSIS

10.1 An EQIA was developed as part of the creation of the Strategies and was considered by both Councils prior to adoption.

10.2 Any new initiatives being brought forward may be subject to separate EQIA's.

10.3 There is no requirement to complete a new EQIA for the purpose of this report.

11. ENVIRONMENTAL IMPLICATIONS

11.1 There are no Environmental Implications from carrying out the review of the Strategies. Any actions within the strategies, which have environmental implications will be considered separately.

12. APPENDICES

Title	Location
(a) Joint Homes and Housing Strategy	Weblink: https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/Home-Housing-Strategy-Final-21032019-.pdf
(b) Action Plan (as adopted)	Weblink: https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/Homes-and-HRSS-2019-2024-Action-Plan-FINAL.xlsx
(c) Homelessness Reduction and Rough Sleeping Strategy	Weblink: https://www.babergh.gov.uk/assets/Housing-and-Homelessness/Housing-Strategy/HRRSS-2019-2024-Final.pdf

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Agenda Item 10

Babergh Overview and Scrutiny Committee Work Plan 2020/21:

TOPIC	PURPOSE	LEAD OFFICER	CABINET MEMBER	PREVIOUSLY PRESENTED TO COMMITTEE
19 October 2020-CANCELLED				
23 November 2020 - JOINT				
Representatives on Outside Bodies	A review of the Representatives on Outside Bodies and an update on the work undertaken	Corporate Manager – Democratic Services Senior Governance Support Officer		
14 December 2020 - JOINT				
Planning Enforcement - Review of Service Transformation work	Following the Scrutiny in February 2020 Members	Chief Planning Officer	Cabinet Members for Planning	20 February 2020 JOS/19/25
18 January 2021				
Draft General Fund (GF) 2021/22 and Four-year Outlook	Scrutiny of the GF Budget for 2021/2022	Assistant Director – Corporate Resources Corporate Manager – Finance	The Leaders Cabinet Members for Finance	BDC 21 January 2020
Draft Housing Revenue Account (HRA) and Four -year Outlook	Scrutiny of the HRA Budget and Business Plan	Assistant Director – Corporate Resources Corporate Manager – Finance	The Leaders Cabinet Members for Finance	BDC 21 January 2020
22 February 2021				
Annual Review of Local Citizens Advice	Scrutiny of the funding arrangements for the Citizens Advice	Assistant Director – Sustainable Communities	Cabinet Members for Communities	
Public Realm	A review of Management of public open space secured in relation to planning	Assistant Director – Environment and Commercial Partnerships	Cabinet Members for Environment and Commercial Partnerships	

22 March 2021				
Crime and Disorder Panel meeting	The Committee conduct a scrutiny review of the SWSCP to fulfil the Councils Statutory requirements	Assistant Director – Sustainable Communities Community Safety Professional Lead - Communities	BDC Cabinet Member for Communities MSDC Cabinet Member for Housing and Communities	8 January 2020 – JOS/19/20
19 April 2021				
24 May 2021				
Review of the Overview and Scrutiny Committee 2020/21	Review of the work conducted throughout 2020/21 – Lessons learnt, improvements and achievements	Corporate Manager – Democratic Services Senior Governance Support Officer		

Topics identified for review but not currently timetabled:

Underspend of Grants for bringing empty homes back into to use

A report to be brought to Committee for the effect of the underspending off grants for bringing empty homes back into use – **To be reviewed by the Chair in February/March 2021**

Crime and Disorder Panel meeting

Required to take place at least once a year, provisionally agreed to take place in **March 2021**

Customer Service Update July 2021 – an Information Bulletin brought to Committee as a result of the presentation update on 20 July 2020, to include a general update but focusing on Face to Face customer services performance.

Improving Access to the Private Rented Sector - Chairs to discuss the timing for bringing this to Committee

Other topics identified:

- Home ownership review

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Agenda Item 11

MID SUFFOLK OVERVIEW AND SCRUTINY COMMITTEE

WORK PLAN 2020/21:

TOPIC	PURPOSE	LEAD OFFICER	CABINET MEMBER	PREVIOUSLY PRESENTED TO COMMITTEE
19 October 2020 – CANCELLED				
23 November 2020 - JOINT				
Representatives on Outside Bodies	A review of the Representatives on Outside Bodies and an update on the work undertaken	Corporate Manager – Democratic Services Senior Governance Support Officer		
14 December 2020 - JOINT				
Planning Enforcement - Review of Service Transformation work	Following the Scrutiny in February 2020 Members	Chief Planning Officer	Cabinet Members for Planning	20 February 2020 JOS/19/25
14 January 2021				
Draft General Fund (GF) 2021/22 and Four-year Outlook	Scrutiny of the GF Budget for 2021/22	Assistant Director – Corporate Resources Corporate Manager – Finance	The Leaders Cabinet Members for Finance	MSDC 16 January 2020
Draft Housing Revenue Account (HRA) and Four - year Outlook	Scrutiny of the HRA Budget and Business Plan	Assistant Director – Corporate Resources Corporate Manager – Finance	The Leaders Cabinet Members for Finance	MSDC 16 January 2020
22 February 2021 - JOINT				
Annual Review of Local Citizens Advice	Scrutiny of the funding arrangements for the Citizens Advice	Assistant Director – Sustainable Communities	Cabinet Members - Communities	
Public Realm	A review of management of public open space secured in relation to planning	Assistant Director – Environment and Commercial Partnerships	Cabinet Members for Environment and Commercial Partnerships	

22 March 2021 - JOINT				
Crime and Disorder Panel meeting	The Committee conduct a scrutiny review of the SWSCP to fulfil the Councils Statutory requirements	Assistant Director – Sustainable Communities Community Safety Professional Lead - Communities	BDC Cabinet Member for Communities MSDC Cabinet Member for Housing and Communities	8 January 2020 – JOS/19/20
19 April 2021 - JOINT				
24 May 2021 - JOINT				
Review of the Overview and Scrutiny Committee 2020/21	Review of the work conducted throughout 2020/21 – Lessons learnt, improvements and achievements	Corporate Manager – Democratic Services Senior Governance Support Officer		

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- Home ownership review

Agenda Item 13

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of the Local Government Act 1972.

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