



## Housing Delivery Test Action Plan July 2022

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### Front cover photos:

Stevenage proposed Town Centre Regeneration

New Council Homes at Addison House, Shephall Way, Stevenage

Kenilworth Neighbourhood Centre, Kenilworth Close, Stevenage

## 1.0 Purpose of this Action Plan

- 1.1 The Housing Delivery Test (HDT) was introduced by Central Government into the planning system in 2019 as part of the National Planning Policy Framework (NPPF).
- 1.2 The HDT is an annual measurement on whether local authorities are delivering sufficient houses to meet their identified housing needs.

**Housing Delivery Test (%) =**

$$\frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 1.3 The HDT compares the net homes delivered over three years against the number of homes required over the same period; in the case of 2021 the measurement years are 2018/19, 2019/20 and 2020/21.

The results are based on a percentage score which is published annually by Government<sup>1</sup>. The consequences are set out below:

Requirement	Consequence
<b>Equal to or above 95%</b>	No action required
<b>Below 95%</b>	The Local Planning Authority is required to prepare an action plan to increase housing supply
<b>Equal to or below 85%</b>	The Local Planning Authority is required to include a 20% buffer in their 5yr housing supply calculations, in addition to preparing an action plan
<b>Equal to or below 75%</b>	Apply the presumption in favour of sustainable development, in addition to preparing an action plan and applying a 20% to the five-year housing land supply.

Table 1 include HDT requirements / consequences

- 1.4 These consequences apply concurrently, for example those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published.

<sup>1</sup> Planning Practice Guidance (PPG) provide guidance on how the housing the delivery test measurement is set out and should be read in conjunction with the Housing Delivery Test Measurement Rule Book (July 2018).

## 2.0 Summary of this Action Plan

- 2.1 As shown with the recent Housing Delivery Test result, between 01 April 2020 and 31 March 2021, Stevenage Borough Council has under-delivered on new housing achieving 79% of the new homes required over this period.
- 2.2 This Housing Delivery Test 2022 Action Plan assesses some of the key issues that have contributed to the under-delivery of new housing as well as assess the challenges facing future delivery. The Action Plan needs to be considered within the current and evolving context of the Coronavirus pandemic and associated economic recovery.
- 2.3 The Plan's effectiveness and progress will be monitored by assessment against future annual Housing Delivery Test results and data in the Council's Annual Monitoring Report (AMR).

## 3.0 Planning Policy Context

- 3.1 The National Planning Policy Framework (NPPF) seeks to considerably boost the supply of new homes and requires local planning authorities to have strategic planning policies that identify the minimum number of homes required over the plan period. Local Plans are also required to include a housing trajectory to illustrate the expected build out rate of housing delivery for each year across the plan period. In accordance with the NPPF, local planning authorities should also identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement as set out in their adopted Local Plan.
- 3.2 In order to support the Government's commitment to deliver 300,000 new homes a year by the mid-2020's, the Council are required to consider a number of documents;
  - National Planning Policy Framework (NPPF)
  - updated Planning Practice Guidance (PPG) advice;
  - Housing Delivery Test Measurement Rule Book (July 2018); and
  - Housing Delivery Test: 2018 Measurement Technical note (February 2019)

### Maintaining supply and delivery

- 3.3 The NPPF (July 2021) makes clear that:

*"To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years"<sup>2</sup>.*

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<sup>2</sup> National Planning Policy Framework (July 2021) Paragraph 76

## Planning Practice Guidance

The PPG Paragraph 050 provides guidance on how local planning authorities may wish to include an analysis of under-delivery. The following considerations can be used as a guide but are not limited to<sup>3</sup>:

Planning Practice Guidance Considerations	Stevenage Borough Council Analysis
Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales	There is no evidence that there are any significant barriers to early commencement in the Borough.
Barriers to delivery on sites identified as part of the 5-year land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)	There is no evidence that there are any significant barriers to delivering sites that have obtained planning permission.
Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits	100% of major planning applications were processed within 13 weeks (unless there was an agreed extension).
Whether the mix of sites identified is proving effective in delivering at the anticipated rate	There is no evidence that the mix of sites approved are adversely affecting delivery.
Whether proactive pre-planning application discussions are taking place to speed up determination periods	The council offers a pre-application (pre-app) service for developers whereby applicants can submit proposals and planning officers can offer advice on how policies will be applied to proposals, raise any issues that may arise and advise on the level of information that would be required as part of a formal planning application. There is no evidence to suggest that pre-app discussion require any further intervention.

<sup>3</sup> Paragraph: 050 Reference ID: 68-050-20190722

Planning Practice Guidance Considerations	Stevenage Borough Council Analysis
The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery	The Council continues to work proactively with stakeholders to bring forward and accelerate strategic sites allocated in the proposed Local Plan.
Whether particular issues, such as infrastructure or transport, could be addressed at a strategic level – within the authority, but also with neighbouring and upper tier authorities where applicable	Infrastructure and transport have been addressed at the strategic level in work with HCC and with neighbouring and nearby authorities.



## 4.0 Local Plan Policies

### The Stevenage Borough Council Local Plan 2011 – 2031

- 4.1 The Stevenage Borough Local Plan was adopted in May 2019. The plan seeks to provide around 7,600 new homes between 2011 and 2031. This can be annualised to give a figure of 380 new homes per year. The plan sets out a comprehensive strategy to support significant growth in and around Stevenage to help meet needs across the market area<sup>4</sup>. To date, the Council have already made progress towards this target. On 01 June 2022, the Council recorded 2,325 new homes had been completed since the start of the plan period. This leaves a residual requirement of 5,275 new homes to be developed up to the end of the plan period 2031.

#### Policy HO7 Affordable housing targets

- 4.2 The local plan highlights that, planning permission will be granted for residential developments that maximise affordable housing provision. The following target levels of affordable housing provision will apply to schemes that meet the thresholds set out in national guidance:
- 25% of new homes on previously developed sites; and
  - 30% of new homes elsewhere
- 4.3 The Council's Five-Year Land Supply includes the provision of a number of affordable housing units. Table 2 below illustrate the forecast for affordable housing delivery 2011 – 2026/27. At present, the Council can demonstrate a delivery of 1,380 affordable units between 2011 and March 2027.

Deliverable Housing	No. of homes	Comments
Total Number of Affordable Units Dwellings for Sites with Detailed Planning Permission	395	NPPF Part A
Total Number of Dwellings for Sites with Outline Permission	690	NPPF Part B
Total Identified Supply 2011- 2026/27	1,085	
Total Delivered 2011 - 2022	295	Smartherts
Total Required 2011 – 2031 based on (SP7) 30% new homes elsewhere	2,280	(114 Annual Requirement x 20yr Plan Period)
Total Shortfall	900	

Table 2 Affordable Housing Supply 2011-2026/27

- 4.4 This means the Council will need to provide 900 units over the remaining plan period in order to meet local need. However, the current figure excludes new housing commitments from the 01 June 2022 onwards and a number of schemes (Table 3) which do not currently meet the definition of NPPF Part A or Part B.

<sup>4</sup> Policy SP7: High Quality Homes

**Developable Housing**

Total Number of Units	2,395
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Table 3 Developable Sites not included in 5 Year Housing Land June 2022 Supply

- 4.5 The Council will continue to progress these sites in line with the Council's corporate priorities to deliver more social and affordable homes in Stevenage over the next five years.

**Relationship to other plans / strategies and council activities**

- 4.6 The Council have a number of overlapping plans and strategies in place that prioritise regeneration and renewal in Stevenage. These measures all have the full support of local leadership teams and Councillors:

- Accelerating Housing
- Town Deal
- Area Action Plan – Station Gateway
- Future Town, Future Transport Strategy
- Local Cycling and Walking Infrastructure Plan

- 4.7 The Council has recently adopted a number of Supplementary Planning Documents (SPDs) linked to the Local Plan 2011 – 2031. These will provide support for new developments prior to submitting an application:

- Impact of Development on Biodiversity
- Developer Contributions
- Parking Provisions and Sustainable Transport
- Stevenage Design Guide

- 4.8 The Council is currently progressing / updating:

- Updated Stevenage Design Guide
- Older People's Strategy
- First Homes Position Statement

**Corporate Plan**

- 4.9 The Council's Corporate Plan, Future Town Future Council (FTFC) Action Plan sets out the Council's ambitions for Stevenage for 2022/23. Key priorities most relevant to housing delivery being:

- Begin to deliver the next phase of the Town Centre regeneration (SG1) project
- Develop 14 private sale homes and use the income to fund the development of more social and affordable
- Start work on a further 44 social and affordable rent homes across a range of local schemes
- Seek planning permission on a further 160 homes across two schemes
- Provide ongoing support and housing supply for our flagship Housing First approach



## 5.0 Housing Delivery Test 2021 Results

- 5.1 The Housing Delivery Test (HDT) results were published by the Ministry of Housing, Communities and Local Government on 14 January 2022.

Stevenage Borough Council's results for the last three Housing Delivery Tests are as follows:

HDT	No. of homes required	No. of homes delivered	Score	Consequence
2019	1,120	1,262	113%	None
2020	1,094	702	64%	Presumption in favour of sustainable development
<b>2021</b>	<b>982</b>	<b>755</b>	<b>79%</b>	<b>20% buffer and Action Plan</b>

Table 4 – HDT Test Results 2019 – 2021

- 5.2 Over the course of the 2020–21 measurement years, the Government took the decision to apply a 4-month adjustment to the housing requirement figures to consider variations in levels of housing delivery across local authorities as the construction industry continued to face disruption on a national, regional, and local level due to the pandemic<sup>5</sup>.
- 5.3 When applying this adjustment, the number of homes required in Stevenage for the period 2020/21 is 982.
- 5.4 The results of the Housing Delivery Tests dictate that although there is an adjustment for 2020/21 changes are still required to address under delivery of housing in the Borough. As shown within the recent Housing Delivery Test result in Table 2, from 01 April 2020 to 31 March 2021, the Council has under-delivered on new housing achieving 79% of the required supply. Therefore, the Council must now:
- 1) prepare an Action Plan showing how it will increase housing supply;
  - 2) include a 20% buffer in its 5-year housing supply calculations
- 5.5 The first element as set out in this Action Plan will include how Stevenage plans to increase housing supply in the future. The second element requires the Council to include a 20% buffer to the annual housing requirement<sup>6</sup>. As a result, Stevenage Borough Council now has the following housing requirement for the period 1 April 2022 to 31 March 2027:

Annual Requirement	Annual Shortfall	Annual 20% buffer	Total Annual Requirement	Total 5 Year Requirement
<b>380</b>	207.5	117.5	<b>705</b>	<b>3,525</b>

Table 5 – Total Five-Year requirement from January 2022

- 5.6 This Housing Delivery Test 2022 Action Plan assesses some of the key issues that have contributed to an under-delivery of new housing as well as the challenges facing future delivery.

<sup>5</sup> Housing Delivery Test Measurement Rule Book for 2020-2021

<sup>6</sup> In addition to any housing shortfall in previous years

## 6.0 Causes of Under-Delivery

- 6.1 As the Council relies on a number of relatively large strategic sites to meet its housing requirements, it can be very challenging in that, these larger sites take time to progress, particularly if planned to a high standard. The key focus of this Action Plan will be on major developments as the Council expects that will have the greatest impact locally on delivery and the pipeline supply of housing.

This section aims to identify key causes of under-delivery.

### Covid-19

- 6.2 There are a number of factors which are outside the immediate control of the Council and possibly not necessarily down to planning such as; the impact of Covid-19 pandemic and economic decline on the local housing market. National evidence suggests as a consequence of the pandemic the following issues:

- A more prominent gap in skill-based roles.
- Supply and cost of building stock has significantly increased.
- Challenges associated leaving the European Union.
- Delays in delivery and distribution.
- Rise in the cost of materials affecting house builders to build-out schemes.

- 6.3 This may suggest that planning may not necessarily be the main barrier to supply and delivery of housing. The Department for Levelling Up, Housing and Communities (DLUHC) quarterly statistics on housebuilding in England recorded the number of completions in 2020 was 64% lower than in the previous year. Although, the data do not capture all building activity it does go some way to indicate new housing supply. The number of starts in this same period was 56% lower than a year previously, reaching a level last seen in 2008 during the financial crisis<sup>7</sup> which indicates nationally we are still in a period of uncertainty.

### Local

#### Historic Housing Delivery Scores

HDT	No. of homes required	No. of homes delivered	Score	Consequence
2018	1,115	1,119	100%	None
2019	1,120	1,262	113%	None
2020	1,094	702	64%	Presumption in favour of sustainable development
<b>2021</b>	<b>982</b>	<b>775</b>	<b>79%</b>	<b>20% buffer and Action Plan</b>

Table 6 Historic HDT Scores

<sup>7</sup> Tackling the under-supply of housing February 2022 -

<https://researchbriefings.files.parliament.uk/documents/CBP-7671/CBP-7671.pdf>

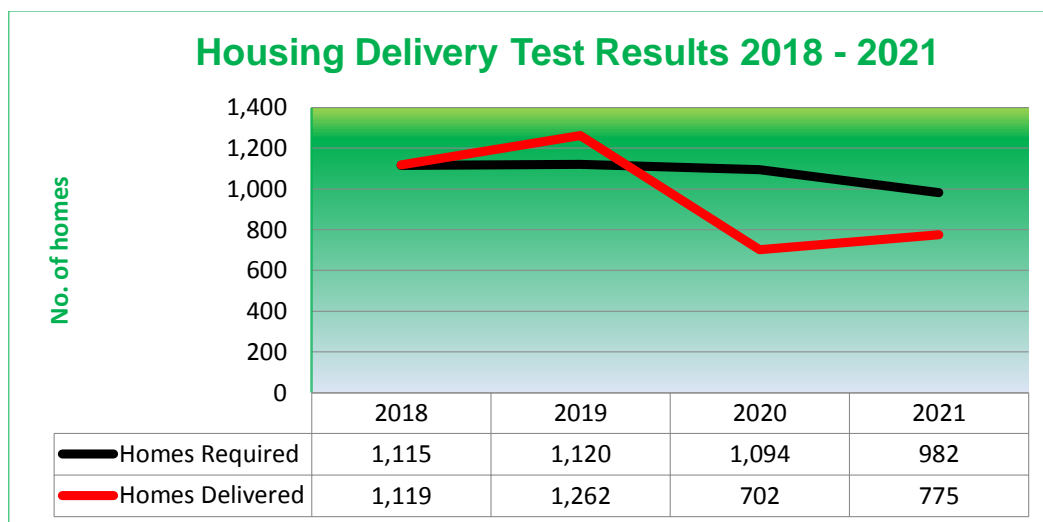


Table 7 Historic HDT Scores

- 6.4 Table 6 and 7 illustrate prior to the HDT result 2020 Stevenage had achieved a level exceeding the highest threshold for consequences. This possibly indicates that had Covid-19 pandemic not impacted house building, the Council may have made considerable progress towards achieving a similar score to 2018 and 2019.
- 6.5 The Planning and Advisory Service (PAS) provide guidance on how local authorities can prepare an effective Action Plan and suggest as a starting point, local authorities look backwards in order to understand the issues with under delivery. With this in mind, this Action Plan seeks to utilise the 2020 score as a base to work from leading up to the most recent score in 2021.

#### 2019 – 2020

- 6.6 The most significant reason for the low HDT score published in 2020 is likely as a result of a low level of applications being submitted in the previous year when the Council held the Examination in Public for the emerging Local Plan. It is understandable that developers would delay submitting planning applications until after the Local Plan was adopted so their application would be assessed against up-to-date policies with up-to-date allocations.
- 6.7 To address this, the Council continued to work proactively with developers to design and bring forward the strategic sites allocated in the proposed Local Plan as well as promoting schemes on its own land and windfall sites.

#### 2020 – 2021

- 6.8 The Council expected the low result for 2019 – 2020 to be a temporary one and that the score in 2020 – 2021 and beyond would rise significantly. To a certain extent this is correct in that, the latest HDT result published in January 2022 reduced the number of homes considerably to take into account the impact of the pandemic. As a result, the Council do not have to apply the tilted balance in favour of the presumption in favour of sustainable development when decided planning decisions.
- 6.9 As part of the process of preparing this Action Plan, comments were sort from the Council's Housing and Development Team in order to identify causes of under delivery during 2020 – 2021. Feedback confirmed that during the pandemic housing delivery was impacted and as a consequence the team expect delays to the housing

programme in-year and in 2021 – 2022, in particularly as this was also combined with national material shortages and supply chain disruptions.

### Actions taken as a result of external impacts

- 6.10 A professional consultant team roundtable review highlighted, borne out by (anecdotal and empirical evidence on site) that 2022 – 2023 brings added pressures of larger than expected build price inflation which is reported to be at 10 – 15%.
- 6.11 Evidence from monitoring supply chains, interviewing contractors and witnessing activity on site corroborates the difficulties faced by contractors in delivering fixed price contracts. Indeed, one main contractor has issued stark contractual warnings that they are in financial difficulty, with the possibility of liquidation.
- 6.12 As a result, delivery is being supported by a more pragmatic approach to contracting, and joint ventures that allow for an element of profit share. In this way build price inflation can be countered by corresponding rises in sale revenue that can be shared giving a more balanced distribution of risk and reward. Additional actions are as follows:
- Longer programmes for delivery are being designed for new schemes with an in built 25% (4 month) extension to what would have been a normal 16-month programme. This is now at 20 months.
  - Extensions of time are being granted on existing contracts.
  - Variable supplies of quality internal and external finishes are being accepted as substitutes from original specifications.
  - Schemes that are delivered through Modern Methods of Construction (MMC) are also being investigated & piloted. Evidence: Oaks Cross modular scheme of 11 x 1 bed bungalows due for delivery 2022.
- 6.13 It is clear the pandemic impacted the construction industry affecting not only the progress of large strategic sites but also current housing commitments in general due to continued construction industry disruption.
- 6.14 Nonetheless, during the early part of this year, the Council have seen some positive signs that future supply and activity are on a positive increase reporting a higher-than-average number of new housing starts in March 2022.

### Planning decision performance

Planning Application Category	Number of applications determined	Completion target	% determined in 2019/20	On target?
Major	9	60 % in 13 weeks	100%	Yes
Minor	93	65% in 8 weeks	88%	Yes
Other	301	80% in 8 weeks	92%	Yes

Table 7 - Source: Stevenage Borough Council, 2022

- 6.15 Stevenage Borough Council has a good track record of progressing planning applications within the statutory time limits in line with the NPPF Paragraph 050. The Council has been determining applications for housing with a high level being granted during 2020 and March 2021. More recently, during April 2021 – March 2022 the Council granted 1,098 new housing units.

- 6.16 Stevenage Borough Council has a good track record of processing planning applications within the required time frames. In the monitoring period 2020 – 2021, 100% of major planning applications were processed within 13 weeks (unless there was an agreed extension). The national average is 60% therefore; the Council is working 40% national set targets.

## 7.0 Best Practice Guides

### What can local planning authorities review as part of the Action Plan?

- 7.1 The action plan sets out key information relating to the Housing Delivery Test Action Plan and how Stevenage Borough Council are committed to identify ways to support housing delivery in the Borough.

### The Planning Advisory Service

- 7.2 The Planning Advisory Service<sup>8</sup> (PAS) has published guidance to help support local authorities prepare an effective Housing Delivery Test Action Plan. PAS highlight the importance of looking backwards as a starting point in order to understand the issues that have affected housing supply over the last three years and to look forward to potential issues affecting future delivery. The guidance recommends authorities produce plans to look beyond planning and engage with stakeholders to understand how they can affect housing delivery and what issues or barriers they face when progressing with proposals for new housing development. For effective action planning, the guidance recommends that authorities consider both short-term and medium and longer-term remediation measures.

## 8.0 Housing Supply and Delivery Challenges

- 8.1 This section of the Action Plan considers the housing supply and delivery challenges.
- There are a number of factors that can impact building new homes some of which fall out of the scope of the local authority.

### Secondary Legislation

- 8.2 The Town and Country Planning (Use Classes) Regulation made changes to the use class system in England in September 2020. The regulation created a new broad 'Commercial, business and service' use class (Class E) to incorporate previous use classes for shops, financial and professional services, offices, restaurants and cafes. As a result, expanded the type of businesses and service not considered to be development and therefore does not require planning permission.
- 8.3 The new use class allows for a mix of uses to reflect changing retail and business models, recognising that a building may be in a number of uses at the same time or that it may be used for different uses at different times of the day. Equally, structural changes in the need and use of buildings altered as a result of Covid-19 changing the way we work and access services. As with most Local Authorities the Council

<sup>8</sup> Planning Advisory Service 'Housing Delivery Test Preparing Effective Action Plans' (June 2020)

would expect to see additional land and properties coming forward for new housing development due to these changes.

- 8.4 In a response to national changes to widen the scope of changes of certain use classes to residential development to support vacant and derelict buildings for housing the Council has reviewed the existing Article 4 Direction across specific employment areas in the borough. The proposed Directions will require planning permission to be sought for changes of use from E(g)(i) (offices) and E(g)(iii) (light industrial) to C3 (dwelling houses) within Gunnels Wood and Pin Green. The principal aim is to protect employment uses within the designated Employment Areas

### Optimising site densities

- 8.5 The Town and Country Planning (General Permitted Development) Order introduced permanent permitted development rights in August 2020 to allow for the construction of additional storeys on free standing blocks and on buildings in a terrace that are houses or in certain commercial uses, and in mixed uses with an element of housing, to create additional self-contained homes.
- 8.6 One of the key challenges within Stevenage is the limited availability of land for new housing other than sites allocated in the Local Plan. Therefore, to meet the borough's housing targets it is crucial to ensure that land is used efficiently, and the number of homes delivered on sites is maximised. In line with this, the Local Plan housing policies support the optimisation of site densities in specific areas and the Council would expect to see more properties coming forward for additional self-contained housing development.

### Innovative housing delivery

- 8.7 The Local Plan seek to support innovative methods of housing delivery such as Build to Rent to help boost housing supply and provide choice to meet different housing needs. Additionally, schemes such as Modern Methods of Construction (MMC) are also currently being investigated and piloted in the Borough. The Council would expect these housing methods to provide a contribution to increasing housing availability within Stevenage.

### What can the local planning authority do to boost delivery?

- 8.8 The Council do not directly control the level of house building by private developers, which is what the HDT looks at, but it can help promote future house building. We believe the Council has already taken a proactive approach to development. As such, our Action Plan to deliver sufficient levels of house building will incorporate a number of actions we are already undertaking.
- 8.9 During the early part of 2021, the Planning and Development Committee had resolved to grant planning permission to a number of significant schemes including 1,867 apartments as part of the "SG1" regeneration of the town centre, 800 homes at the North Stevenage extension, 757 apartments as part of the redevelopment scheme at the Matalan site and 250 apartments at the BHS sites within the town centre, a new 133 dwelling development at Todds Green and 85 homes at Webb Rise. Since this time the Council has granted detailed planning permissions for the former BHS site and Todds Green development which is now under construction.



- 8.10 We have already progressed schemes on our own land including redevelopment at Kenilworth Close neighbourhood centre, Dunn Close garages and Land adjacent to 108 Oaks Cross. This equates to 159 new homes of which both Kenilworth Close and Dunn Close garages are now under construction.
- 8.11 The Council is expecting more progress at the private sector schemes allocated in the Local Plan including a hybrid application for 1,500 homes to the West of Stevenage. This is a scheme that Planning Officers have been heavily engaged with during pre-discussions for over 12 months and expect pre-commencement conditions to be discharged towards the end of 2022.

### Accelerated Housing

- 8.12 The Hertfordshire Authorities (with the support of Hertfordshire County Council) have agreed to work together to identify support that delivery Hertfordshire's housing pipeline needs. The evidence gathered to date identifies a combination of works required to unblock delivery and overcome market failure throughout the County<sup>9</sup>. These include measures such as;

- Site assembly.
- Site remediation.
- Fund uplifts in affordable housing delivery (where viability issues are resulting in low or non-existent levels of affordable housing being delivered).
- Builds on the potential to maximise the contribution of publicly owned land for the delivery of affordable housing.

Most relevant to Stevenage are;

- Site remediation.
- Infrastructure.
- Land / site assembly.
- Affordable delivery.

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<sup>9</sup> Hertfordshire Growth Board Growth and Housing Delivery Prospectus 2021 August 2021 v.4

## Housing Supply

- 8.13 In order to understand the Council housing supply, the Council calculate its Housing Land requirement using the 'Liverpool' approach. This approach allows for any historic undersupply to be delivered across the rest of the Local Plan period.

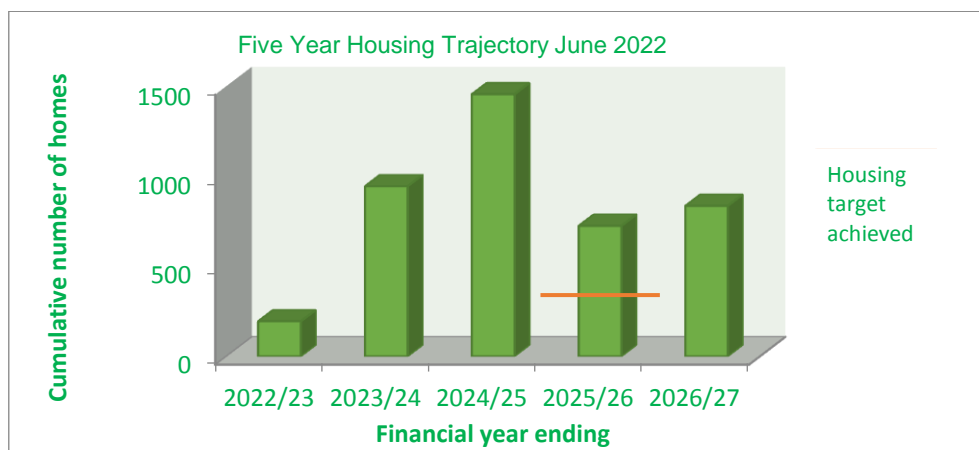


Table 8 – Stevenage Borough Council Five Year Housing Trajectory June 2022

- 8.14 Table 8 illustrates that, as of June 2022 the historic undersupply of new homes against the plan period target is -1,855. This means the Council need to deliver 1,855 homes in 2022 in order to meet the target over the plan period.
- 8.15 Taking account of the fact that the Council is reliant on a small number of strategic sites that have a longer lead-in time, Table 8 illustrates delivery on these strategic sites are not expected until mid-way through the plan period.
- 8.16 Table 8 provides a cumulative number of new homes reasonably expected over the next five years. This demonstrates that larger allocation schemes begin delivery of new homes during financial years 2023 – 2024<sup>10</sup> with housing delivery accelerating towards the end of March 2025. The Council therefore expect to have met its housing requirement over and above the housing target by 31 March 2026.

<sup>10</sup> Part A is made up of units under construction, with full planning permission and with prior notification. Part B includes units with Outline Permission, with approval subject to S106 and/or Local Plan allocations. It does not take into account sites the Council consider developable as defined by NPPF Paragraph 007 or any new housing commitments from April 2023.

### Potential for a stepped approach

- 8.17 Considering the Liverpool method of meeting the shortfall over the plan period the Council will consider the option for a stepped housing trajectory. This method acknowledges the lower past delivery rates and has a lower initial requirement to allow time for the Local Plan sites to have an impact before the housing requirement increases. This approach uses different housing requirements for different years in the plan, 'stepped up' the housing requirement as the plan progresses.

Stepped Approach Figures are based on June 2022 Five Year Land Supply	2022/23	2023/24	2024/25	2025/26	2026/27
Cumulative figure in units	195	925	1,436	705	816
Windfall allowance	0	20	20	20	20
OAN requirement	380	+380	+380	+380	+380
Under delivery deficit * -1,855	-1,855	-2,040	-1,475	-419	-94
Deficit requirement after completions that year	-1,660	-1,095	-39	+286	+722

Table 9 - example of stepped approach based upon Five Year Land Supply June 2022

- 8.18 As part of the Local Plan Review and Action Plan, the Council would consider the option to incorporate a 'step up' approach to take into account housing delivery projections April 2025 to March 2026 in line with the data presented.

## 9.0 Actions

- 9.1 Many of the measures that a Council can take are already being implemented by the Council. The Council has a recently adopted Local Plan which sets an aspirational housing target and the Council has been determining applications for housing at a significant level.
- 9.2 The Council is working proactively with developers to design and bring forward the strategic sites allocated in the Local Plan, whilst promoting schemes on its own land and windfall sites. As such, and made clear by the high level of deliverable sites and those National Planning Policy Framework classify as 'developable', the Council is applying considerable effort to increase the housing supply of the borough.

### Brownfield Register

- 9.3 Changes to the Town and Country Planning General Permitted Development order came into force on 31 August 2020. This created a further new permitted development right, for the demolition of certain types of buildings and replacement builds as residential to create new homes. As a result, the reform aim is to support the brownfield regeneration allowing vacant and derelict buildings to be repurposed quickly for housing. In line with this, the Council will seek to update its brownfield register in December 2022 to encourage house building within Stevenage.

### High Quality Homes

- 9.4 To continue to provide good quality affordable homes, in particular for those most in need in a continued commitment to build over 7,600 new Council home by 2031.

### First Homes

- 9.5 On the 24 May 2021, the Government announced its First Home policy through a Written Ministerial Statement (WMS) and accompanying changes to the Planning Practice Guidance (PPG). As a result, these changes came into effect on the 28 June 2021<sup>11</sup>.
- 9.6 First Homes are designed to support local first time buyers onto the property ladder, by offering homes at a discount to the market price. The discount will apply to the homes in perpetuity, meaning that generations of new buyers and the local community will continue to benefit every time the property is sold.
- 9.7 At present the Council is preparing a First Homes Position Statement. The position statement will set out the key information relating to First Homes and how it will affect the implementation of Policy HO7 Affordable housing targets in the adopted Stevenage Borough Local Plan 2011 – 2031.

### Partnership with neighbouring local authorities

- 9.8 The North East of Hertfordshire Authorities (Stevenage Borough Council, East Hertfordshire Council, Broxbourne Borough Council, Welwyn Hatfield Council and North Hertfordshire District Council, with the support of Hertfordshire County Council) have agreed to work together to produce the North East Hertfordshire Joint Strategic Plan (JSP).
- 9.9 Stevenage Borough Council is currently working with North Hertfordshire to update the existing Strategic Market Housing Assessment (SHMA) Volume II 2016 in order to understand the current housing needs across Stevenage Borough Council. This will provide the latest analysis of affordable housing need and how this translates to housing mix, tenure split and needs of specific groups.

### Small Site Contribution

- 9.10 The Council currently provide a 50% reduction for small site completions based on historic housing delivery, as part of its Five-Year Land Supply. Part of the Action Plan will be to review this figure. Evidence gathered for small site delivery from 2015 to 2022 will be used to justify a reduced threshold. The results will provide an opportunity to increase the number of small housing sites contribution into the Five-Year Land Supply.

### Council built housing

- 9.11 Stevenage Borough Council currently own and are progressing with the delivery of three housing sites that are allocated in the Local Plan for residential development (Appendix A).

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<sup>11</sup> Planning Practice Guidance Paragraph: 001 Reference ID: 70-001-20210524

### Developing local policies

- 9.12 The Council adopted the Stevenage Borough Local Plan in May 2019, with a plan period which runs until 2031. The Council is currently scoping a review of the Local Plan which will include revising evidence relating to housing need, housing market area, growth locations beyond 2031; considering the need to reflect changes in national planning policy and guidance as well as revising existing Local Plan policies and creating new Local Plan policies.

### Monitoring

- 9.13 To account for changes in delivery the Council will continue to regularly monitor its housing land supply implementation rates, and delivery through the publication by way of Five-Year Land Supply Position Statements and Annual Monitoring Reports.

## 10.0 Next Steps

- 10.1 The Action Plan needs to be considered within the current and evolving context of the Coronavirus pandemic and associated economic recovery. The Plan's effectiveness and progress will be monitored by assessment against future annual Housing Delivery Test results.
- 10.2 The actions set out above will be reviewed on an annual basis. The Council will continue to monitor the Five-Year Land Supply and maintain a robust evidence base to support increase housing delivery across the borough.

**Appendix A: Progress at Local Plan sites**

Reference	Location	Indicative Net Dwelling no.	Progress Update July 2022
HO1/1	Bedwell Crescent neighbourhood centre	45	Flood Risk Assessment required for any development of 1 hectare or more.  The Council will continue to work with developers to evidence the deliverability of this site over the forthcoming year.
HO1/2	Bragbury End sports ground car park	8	Permission granted 21/00847/FP for 5 dwellings.
HO1/3	Burwell Road neighbourhood centre	20	Permission granted 17/00586/FPM for 15 dwellings completed 03/02/2020.
HO1/4	Dunn Close garage court	5	This site is owned by Stevenage Borough Council. Permission granted for 27 dwellings 21/00944/FPM. The site is currently under construction.
HO1/5	Ex-play centre, Scarborough Avenue	15	Permission granted 19/00136/FPM for 29 dwellings.  The site is currently under construction, it is anticipated that all dwellings will be delivered at the beginning of the five-year period.
HO1/6	Former Pin Green school playing field	42	The site is a vacant, greenfield site in public ownership of Hertfordshire County Council. The site has not received planning permission and does not currently have a planning application reference. The site is owned by Hertfordshire County Council who has confirmed their intention to bring a scheme forward to meet the service needs of their Adult Care Services Directorate.



Reference	Location	Indicative Net Dwelling no.	Progress Update July 2022
HO1/7	Fry Road day nursery	6	The Council will continue to work with developers to evidence the deliverability of this site over the forthcoming year.
HO1/8	Ken Brown car showroom	36	Investigate whether previous uses have led to any contamination of site. The Council will continue to work with developers to evident the deliverability of this site over the forthcoming year.
HO1/9	Kenilworth neighbourhood centre	65	Permission granted 18/00398/FPM for 169 dwellings. The site is currently under construction, it is anticipated that the dwellings will be delivered at the beginning of the five-year period.
HO1/10	Land at Eliot Road	16	13no Affordable semi-detached and terraced dwellings completed 23/03/2022.
HO1/11	Land West of North Road (Rugby Club)	149	Developers submitted a pre-application in January 2020 which the LPS responded positively to in spring 2020. Development requires the relocation of the existing Rugby Club. The developers have confirmed that a replacement site has been secured.
HO1/12	Marymead neighbourhood centre	60	The Council will continue to work with developers to evidence the deliverability of this site over the forthcoming year.
HO1/13	Scout hut, Drakes Drive	18	The Council will continue to work with developers to evidence the deliverability of this site over the forthcoming year.
HO1/14	Shephall Centre and adj. amenity land	34	The Council will continue to work with developers to evidence the deliverability of this site over the forthcoming year.

Reference	Location	Indicative Net Dwelling no.	Progress Update July 2022
HO1/15	Shephall View	25	This site is owned by Stevenage Borough Council.  Pre-application was submitted for a 97-unit scheme in April 2020 with full planning application expected in September 2021 following a positive response from the Council. To date no permission has been submitted.
HO1/16	The Glebe neighbourhood centre	35	The Council continue to work with developers to evident the deliverability of this site over the forthcoming year.
HO1/17	The Hyde neighbourhood centre	50	The Council continue to work with developers to evident the deliverability of this site over the forthcoming year.
HO1/18	The Oval neighbourhood centre	275	The Council continue to work with developers to evident the deliverability of this site over the forthcoming year.
HO2	Stevenage West	1350	The Council has received an application for development of land to the West of Stevenage from Taylor Wimpey and Persimmon Homes. The application is for 1,500 new homes. Hybrid Application 21/00356 submitted in April 2021 for 390 homes in detail and up to 1,110 in outline.
HO3	North of Stevenage	800	Resolved to grant outline planning permission subject to the completion of a S.106 agreement for a new neighbourhood comprising 800 dwellings.
HO4	South East of Stevenage	550	This site is in two parts. The land to the south of the A602 is the larger of the two sites, and is relatively unconstrained. This site will accommodate around 400 of the new dwellings. The site to

Reference	Location	Indicative Net Dwelling no.	Progress Update July 2022
SG1			the north will accommodate the remaining 150 homes. The Council continues to work with developers to evident the deliverability of this site over the forthcoming year
	Town Centre	2000	<p>Permission granted for 526 new homes on the Former Matalan site 14/00559/OPM. Reserved Matters approved and all remaining conditions discharged. Demolition has been completed. It is anticipated dwellings will be delivered towards the end of the five-year period.</p> <p>Permission granted for 250 new homes on the Former BHS site 19/00647/FPM.</p> <p>Demolition has been completed. It is anticipated dwellings will be delivered by the end of the five-year period.</p>

## Appendix B

### Progress at other sites not in Local Plan

Reference	Location	Indicative Net Dwelling no.	Progress Update and Actions as at July 2022
19/00123/FPM	Land West of the A1(M) and South of Todd's Green	133	The site is currently under construction, and housing development is underway, it is anticipated housing delivery will begin at the beginning of the five-year period
19/00647/FPM	Land West of Lytton Way	576	Planning permission granted in August 2021 Appeal Decision APP/K1935/W/20/3255692. Redetermination of Appeal Decision held June 2022. Awaiting decision.
21/01204/FPM	Land adj to 108 Oaks Cross	11	The site is currently under construction. It is anticipated housing delivery will complete during the five-year period.
19/00485/FPM	Land At Webb Rise	85	38 dwellings complete. It is anticipated 47 dwellings will complete during the five-year period.
21/01002/FPM	11 The Forum	224	Resolved to grant detailed planning permission subject to completion of the S.106 agreement.