



Basildon Borough Council

**Housing Delivery Test
Action Plan**

June 2023

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1. Introduction

Background

1.1 The Housing Delivery Test (HDT) is a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. It was formally introduced in paragraph 75 of the revised National Planning Policy Framework (NPPF), published in July 2018 and updated in July 2021. The Government has produced the Housing Delivery Test Measurement Rule Book (July 2018) which shows the method to be used nationally by all local planning authorities (LPAs) for calculating the Housing Delivery Test results, and further guidance within the Planning Practice Guidance (PPG).

1.2 The HDT is an annual measurement of the number of homes being delivered in an area by comparing the number of new net homes delivered over the previous three years with the LPAs housing requirement. The equation is set out as follows:

$$\text{Housing Delivery Test (\%)} = \left(\frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over the three year period}} \right) \times 100$$

1.3 LPAs are required to undertake this test and submit it to the Secretary of State for Levelling Up, Housing and Communities who publish the delivery performance for each LPA in England every November.

1.4 The HDT states that:

- Where housing delivery over the previous three years falls below 95% of the housing requirement, the LPA will be required to prepare an action plan setting out the reasons for under-delivery, how to reduce the risk of future under-delivery and what actions are needed to increase delivery within 6 months of the results being published;
- Where delivery has been less than 85% of the housing requirement, a 20% buffer must be added to the LPA's 5 year land supply of deliverable sites;
- Where delivery has been less than 75% of the housing requirement, the NPPF's presumption in favour of sustainable development would automatically apply.

1.5 As stated in the PPG, these sanctions continue to apply until the next HDT is published, which shows that delivery exceeds the required rate of delivery in the following year, or a new housing requirement is adopted, in which case the HDT will be re-calculated. Where delivery exceeds 95%, none of the above sanctions will apply.

1.6 In January 2022, the Government published the most recent HDT results. Against the HDT, Basildon Borough's delivery rate was reported to be 41% of the housing requirement and as such the Council is required to produce an 'action plan', to add a 20% buffer to the Council's 5 year housing land supply and the NPPF's presumption in favour of sustainable development applies.

1.7 As of June 2023, the government has not published a new HDT including delivery in 2022. Consultations on future revisions to the HDT have been held but as of May 2023, no new or revised legislation has been issued.

Purpose of the Action Plan

- 1.8 This action plan provides an analysis of the key reasons for the failure to deliver against the Borough's housing requirement and identifies a series of measures that the Council intends to undertake to increase the delivery of new housing within the Borough going forward.

2. Analysis of Housing Delivery in the Borough

Housing Requirement and Delivery

- 2.1 The housing requirements across the past six years are based on household projections published by Office of National Statistics¹. These are to be used because the Borough does not have an up-to-date adopted Local Plan to set its own housing targets for these years. Table 1 below shows the requirements.

Table 1: Housing Requirement since 2014-15

Year	Housing Requirement
2014-15	660
2015-16	660
2016-17	657
2017-18	773
2018-19	1076
2019-20	974 ²
2020-21	666 ³
2021-22	1043

- 2.2 The housing requirement for the Borough has been consistently around 660 dwellings per year until 2017-18 where the figure increases to 773 dwellings per year, which then rose to 1076 dwellings per year in 2018-19 and decreased slightly to 974 in 2019-20 and 666 in 2020-21. It should be noted that this is due to a reduction applied to reflect the Covid-19 pandemic. This is addressed in paragraph 3.8
- 2.3 Table 2 below sets out the housing delivery achieved in the Borough per year since the reporting year 2014-15.

Table 2: Dwelling completions since 2014-15

Year	Gross	Loss	Net
2014-15	708	30	678
2015-16	847	31	816
2016-17	468	56	412
2017-18	354	13	341
2018-19	373	33	340
2019-20	471	11	460
2020-21	356	39	317
2021-22	459	21	438

- 2.4 Compared to the housing requirement, there has been under-delivery for six of the last eight years (indicated in red). As evidenced in the Council's statutory Annual Monitoring Reports, there is a

¹ <https://webarchive.nationalarchives.gov.uk/20151203162720/https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

² Reduction of 1/12 applied to reflect Covid 19 pandemic as outline in paragraph 3.8,

³ Reduction of 4/12 applied to reflect Covid 19 pandemic as outlined in paragraph 3.8.

persistent under-delivery which has resulted in a significant shortfall in housing within the Borough. This has had implications for the local housing market and has contributed towards house price increases and reducing affordability in the borough. In turn, this is now reflected in the market uplift to be applied in the Borough as part of the Government's standard method for calculating housing need. The standard method is referred to in national policy as being the minimum annual local housing need figure and is applicable from 2018 onwards.

- 2.5 There has also been considerable variation in the net delivery rates achieved in the Borough, per annum, over this time with the highest number recorded in 2015-16 (816 dwellings) and the lowest in 2018-19 (340 dwellings). The high delivery rates achieved between 2014 and 2016 are largely attributed to the number of new homes delivered by office to residential conversions within the Borough's urban area, including Basildon Town Centre, through the General Permitted Development Order's prior approval process.
- 2.6 The slight increase in delivery in 2019-20 and 2021-22 is due to the completion of a single large office to residential conversion in each year.

The Borough's Housing Land Supply

- 2.7 The Council's five-year housing land supply report (2023 - 2028) identified a future five year supply of 2,248.6 new dwellings⁴. This lower supply is partly attributed to the withdrawal of the Basildon Borough Revised Publication Local Plan (2014 – 2034) on the 3rd March 2022.
- 2.8 This supply is not however sufficient for the Council to meet its identified housing need over the same reporting period and, as such, the Council has reported a shortfall in its five year housing land supply position of 3,936.4 dwellings. The supply would equate to 37% of the need including a 20% buffer (6258 dwellings). While some windfall delivery may take place, given the lack of an up-to-date adopted Local Plan, there cannot be further large land allocations to bring forward sufficient housing numbers to help in replenishing the pipeline of housing sites.
- 2.10 The Council has granted hybrid planning consent for up to 700 homes at Gardiners Lane South. There are considerable infrastructure delivery requirements to bring this whole site forward within the next 5 years. Therefore only around 150 of the dwellings can be expected to be delivered in the next 5 years. Consent was granted on appeal for 492 dwellings at Land at Market Square. However this is a complex brownfield site and, therefore, it is expected that only half the site is expected to complete in the next 5 years.
- 2.12 The shortfall of suitable, available and deliverable sites for development is considered to ultimately be the main reason why there is a reported under-delivery in housing within the Borough. Until the Council is able to adopt a new Local Plan, it is not expected that the level of supply will significantly improve. There is evidence of increased developer activity and sites are currently under discussion that formed allocations from the withdrawn Local Plan.

Measurement of Housing Delivery 2021

- 2.13 Table 4 below shows the initial figures used to calculate the percentage measurement reported by the HDT.

⁴ This includes new residential care homes delivering bedspaces rather than dwellings. A ratio is applied to calculate the equivalent number of dwellings.

Table 5: Housing requirement and delivery for Basildon Borough for 2021

	2018-19	2019-20	2020-21	Total number
Number of homes required	1,076	974	666	2,717 ⁵
Number of homes delivered	340	460	317	1,117

2.14 Basildon Borough has not delivered its annual housing target in the last three reporting years which has resulted in the Borough achieving only 41% of its expected housing delivery across the three year period. The average delivery performance across Essex for the same time period was 104% which is significantly higher than in Basildon Borough.

2.15 Housing Delivery Test 2021 results have been published for 294 Local Planning Authorities.

- 208 delivered 95% or more of the homes required.
- 21 authorities delivered 85-94% of the homes required.
- 16 authorities delivered 75-84% of the homes required.
- 49 authorities delivered less than 75% of the homes required.

2.16 Basildon Borough's Housing Delivery Test places it in the ten lowest delivering Local Planning Authorities. However, it is to note that many of these authorities are heavily constrained by either high proportions of Green Belt, or the sea, therefore limiting the land availability beyond the tests of 'suitable', 'available' and 'achievable'. The outlier is the Royal Borough of Kensington and Chelsea, where 70% of its land is falls within conservation areas.

Table 6: Ten lowest delivering Local Planning Authorities in 2021

Local Planning Authority	Housing Delivery Test 2021 Result
Southend-on-Sea	31%
Eastbourne	32%
Epping Forest	35%
Epsom and Ewell	35%
Worthing	35%
Tandridge	38%
Basildon	41%
Hastings	42%
Kensington and Chelsea	43%
Bromsgrove	44%

Delivery of Housing Consents

⁵ This does not sum due to rounding as a result of a reduction being applied see paragraph 2.2

- 2.1 As discussed in paragraph 2.7 Basildon Borough currently has a five year housing land supply of 2,321.6 dwellings. Basildon Council considers that these homes will be delivered within the next five years. The National Planning Policy Framework sets out that to be considered deliverable sites for housing should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. Generally, sites for minor development and sites with detailed planning permission which have not expired, are considered deliverable unless there is clear evidence that they will not be built within 5 years, for example, if the site has a long term phasing plan. Where a site only has outline permission, was allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, clear evidence that housing completions will begin on site within five years is required.⁶
- 2.2 Where sites are not considered to meet the NPPF definition of 'deliverable' this does not automatically mean that no delivery will ever take place on such sites. Basildon Council has granted planning consent for dwellings which do not form part of the 5 year housing land supply. Table 7 sets out the reason why these sites are not expected to be delivered within the next five years.

Table 7: Justification for sites excluded from the 5YLS

Reason for exclusion from the five year housing land supply.	No of sites	Justification	No of net new dwellings excluded
Units to be delivered as part of a late phase (greater than 5 years) of a long-term development.	2	Gardiners Lane South is a large infrastructure led scheme increasing the lead in time for construction. Land at Market Square is a complex brownfield site and will require time for construction.	796
Planning permission has expired, or landowner has confirmed no intent to deliver the units.	10	These sites have not come forward. They are mainly for one dwelling.	24
Site is stalled and there is currently no evidence of delivery.	5	Laindon 14&14b- 84 dwellings are outstanding-consent granted in mid-1980's but has not delivered dwellings since 2015. 1-29 Lower Southend Road-111 dwellings outstanding. Phase 1 is complete but phase 2 requires relocation of a Royal Mail Sorting Office. 155 Southend Road- 7 units outstanding due to viability challenges. The Wick phases 2 and 3 -276 dwellings outstanding. Outline consent granted in 1990's but has not delivered dwellings since 2015.	479

⁶ [National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426623/NPPF-Annex-2-Glossary-Guidance.pdf)

		Off Elizabeth Drive, Wickford-1 unit outstanding due to practical issues with construction.	
Major sites recently sold	2	Laindon Shopping Centre has been acquired by Sanctuary Housing. A new application is expected. Eastgate has recently been sold to a new owner. It is currently unclear when construction will begin and a further application may be received.	3,024
No net increase in housing	38	Generally, these are for the demolition of one dwelling and the replacement with a new dwelling.	0

Potential Future Increases to Housing Supply.

- 2.3 There are some sites which benefit from outline planning consent or are brownfield sites which have potential to provide an increase in housing delivery in Basildon Borough over the next 5 years. The Council will work positively with developers to accelerate delivery of these sites.
- 2.4 Recently, outline planning consent was granted for up to 2,800 homes at Eastgate. This site has recently been purchased by new owners and, at this time, there is no clear evidence of when construction will begin. This site will require significant lead in time for reserved matters applications, followed by the discharge of conditions and infrastructure provision and demolition of existing buildings. Therefore, it is expected that the majority of delivery will be in years 6-10. However, there is potential for some homes to be delivered in the next five years as the development is phased.
- 2.5 The Basildon Borough Brownfield Land Registry identifies a total of 22 sites which are available, suitable and achievable for housing development. These sites would collectively have a capacity for around 398 homes and include 29 sites owned by Basildon Borough Council.

3. Key Actions

Reflection

- 3.1 Reflecting on past housing delivery in the Borough, it is clear that the shortage in supply of deliverable sites across the whole Borough is the main barrier to increased and sustained delivery. The current Adopted Local Plan Saved Policies (2007, first adopted in 1998) does not identify land to enable the volume of new housing required today, to meet the Borough's need.
- 3.2 However, it is only through the adoption of a new Local Plan that additional land can be allocated to meet identified needs. Once a Plan is adopted, land will come forward for development and boost housing delivery. A number of recent appeal decisions, involving sites in the Green Belt, have found that the collective totality of planning considerations, including the supply of both market and affordable housing, outweighed the harm identified to the Green Belt and the purposes

for including this land within it. Consequently, for specific sites, very special circumstances have been found at appeal for granting planning permission within the Green Belt which includes the provision of market and affordable housing where authorities cannot demonstrate a five year housing land supply.

Actions taken to date

3.4 The Council has adopted a new Local Development Scheme detailing the timetable for producing a new Local Plan and a Regulation 18 'Issues and Options' consultation will be held over summer 2023.

3.5 Other steps that the Council has taken so far include:

- Published Part One of our statutory Brownfield Land Register which identifies suitable sites for housing in the Borough using previously developed land.
- Delivering market and affordable housing through the Council's wholly owned company, Sempra Homes, and developing surplus Council owned land to provide new social housing.
- Working with funding providers such as Homes England to achieve financial assistance to deliver housing by enabling early delivery on sites and where necessary address issues and barriers to delivery.
- Ensure the Council has sufficient capacity in place to meet the timescales for planning decisions.
- Providing professional training for all officers within Planning Services to deliver efficiently future schemes.
- Working with landowners to undertake a borough wide urban capacity study to identify additional urban land supply for housing development.
- Engage with housing associations and other house building delivery vehicles to encourage delivery of affordable housing, alongside the ASELA Housing workstream.
- Assessment of sites with planning permission where development has not commenced work or has stalled and liaise with the developer, landowner and/or case officer to encourage on site starts and assist with delivery if affected by other regulatory regimes or agreements.
- Promoting the already widely used Planning Performance Agreements (PPAs) to assist in the delivery of potentially complex applications.
- Encouraging the uptake of the pre-planning application advice service to reduce abortive work by developers to bring forward schemes.
- Streamline the use of planning conditions to ensure these are applied in a reasonable and proportionate manner.
- Given consideration to the future of sites identified as draft housing allocations in the withdrawn Draft Local Plan if they are promoted for housing development. The withdrawn Draft Local Plan did not undergo a full Examination in Public and, therefore, now carries no material weight in the planning process. However, the Council evidence base which informed the selection of draft housing allocations continues to have some weight in the planning process. Therefore, careful consideration must be given to whether the adverse impacts of granting permission on a specified site does or does not significantly and demonstrably outweigh the benefits including housing delivery. The Council will consider if a former allocation is a self-contained site which can be delivered in a sustainable way

including the provision of any necessary infrastructure or if it can only be delivered as part of a comprehensive local plan⁷.

- Make the best use of previously developed land including limited infilling or the partial or complete redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt where the development would re-use previously developed land and contribute to meeting an identified affordable housing need (Paragraph 149 of the NPPF).
- The recent 'Call for Sites' has encouraged more land submissions for our consideration.

3.6 The above points may result in a limited number of additional completions; however, they are unlikely to result in the creation of sufficient new homes to meet the housing need in full.

Future Actions

3.7 Whilst the adoption of a new Local Plan will be the greatest catalyst for increasing delivery, there are other actions that the Council could take in order to increase delivery both in the short and longer term. These other actions include:

- Publish part two of the Brownfield Land Register to allow selected sites within part one of the register to be granted permission in principle for housing-led development. Basildon Council's Brownfield Land Register currently identifies a total of 21 sites which are available, suitable and achievable for housing development and do not currently benefit from planning permission or prior approval for residential development. The majority of these sites are owned by Basildon Council and form part of the Council's house building program.
- Undertaking further borough wide reviews of the Urban Area to consider opportunities for urban intensification.

Impact of Coronavirus Covid-19 Pandemic

3.8 It is evident that the effects of Covid-19 have had a significant impact on the house building industry across the nation, including activity in Basildon. Owing to the first national lockdown announced on 23 March 2020 due to Covid-19, we saw disruption to the local authority planning services and construction sector. To reflect the temporary disruption caused, the period for measuring the homes required in 2019/20 was reduced by 1 month. To reflect the temporary disruption in 2020/2021 the period for measuring the homes required has also been reduced by 4 months.

3.9 Our engagement with housing developers indicates multiple factors reducing the delivery of housing during the pandemic. These included:

- Temporary site closures
- Reduced capacity to allow for social distancing and staff/contractors isolation
- Interruptions to supply chains
- Reduced customer confidence in the early stages of the pandemic.

⁷ APP/V1505/W/22/3298599: Land North of Kennel Lane, CM12 9RR, APP/N0410/W/22/3299849 Land at Beeches Park adjacent Amersham Road and Minerva Way, Beaconsfield.

4. Monitoring Arrangements

- 4.1 The success of the actions set out within this Action Plan will be primarily based on whether housing delivery has improved. The earliest this will become apparent in housing delivery figures will be when the current reporting year's figures from April 2023 to March 2024.
- 4.2 A full review of the Action Plan will still occur following the publication of the next round of HDT results as it is anticipated that the Borough will continue to be under-delivering. Additional actions or amendments to existing actions will be considered during this review.
- 4.3 Monitoring of the Action Plan will utilise the monitoring framework which will report on progress of the Council's emerging Growth Plan as both plans seek to increase housing delivery.