

Housing Delivery Test: Action Plan



July 2021

Chapters

1 Executive summary	2
2 Key actions and responses	9
3 Background	14
4 Housing delivery analysis	18
5 Project management and monitoring arrangements	31

Appendices

Appendix One: Housing developer summit newsletter	32
Appendix Two: Summary of Strategic Housing Activity	36
References	38

1 Executive summary

1.1 The Government's Housing Delivery Test requires those councils that have fallen below 95% against the test to produce and publish an action plan. Publication is required within 6 months of the test results, which for this test is expected by 20 July 2021.

1.2 In its root cause analysis, the Council has identified the following key points that set the parameters for the preparation of its Action Plan:

- It will inform an updated Local Plan Core Strategy. The Council has resolved to commence a partial update of its Core Strategy and published a Local Development Scheme setting out its timetable for the update.
- It supports the monitoring and reporting of the housing land supply and the five-year supply trajectory.
- It notes the importance of deliverability and funding of strategic infrastructure to meet growth requirements through site development. The Council has recently published a refresh of the Infrastructure Delivery Study (2020)
- It notes the time required for landowners seeking outline planning permission and subsequent sale of the site and grant of planning permission to a developer who will deliver on site.
- It reflects on the need for Local Plan policy compliance and the viability challenge to policy via planning applications.
- It considers the viability of bringing forward brownfield sites and their attractiveness to the market and the need for public sector intervention to encourage development in some identified low market value neighbourhoods in the Borough.
- It reflects on the need for high quality planning applications in accord with good planning practice and the policy requirements of the adopted Local Plan including adopted Supplementary Planning Documents, to create well-designed, attractive and accessible spaces where people want to live.

1.3 The Action Plan sets out a range of positive actions the Council has already taken to increase the supply of new homes and to support delivery of different housing types needed. The Council will continue to pursue these actions over the coming months.

1.4 In summary, these key actions are listed below and include activities currently ongoing and proposed new actions:

1.5 Current activity includes granting planning permission for over 3,300 new homes on allocated housing sites since the Sites and Policies Document was adopted in June 2018. In addition, over 1000 homes await the grant of planning permission subject to satisfactory negotiations and resolution of outstanding issues.

- Promoting the Council's pre-application service to ensure delivery of policy compliant and high-quality schemes on allocated sites. Pre-application advice has been provided for schemes totalling around 4,000 new homes.

- Partnering with developers to deliver new homes, under programmes such as Rother Living, cluster sites, and further specific projects at Rothwell Grange, a former older person's care home and development is underway with partners on three town centre sites.
- Working proactively through engagement with landowners and developers to promote delivery of "inactive sites".
- Collaborating with Homes England to unlock funding to promote delivery, through capacity funding and accelerated construction funds.
- Actively marketing housing development opportunities in Rotherham, through the virtual, bi-annual Housing Developer Summit and other regular key events and forums.
- Working to improve the deliverability of brownfield and greenfield sites by preparing Supplementary Planning Documents (SPDs) on development viability and affordable housing provision adopted 21 June 2021.
- Working to deliver the Bassingthorpe Farm Strategic Allocation in the longer term, alongside the majority landowner, Fitzwilliam (Wentworth) Estates. A masterplan and comprehensive technical studies have been prepared, funded through Homes England Capacity Funds. These await publication.
- Ongoing monitoring of commitments and completions and identification of key areas of concern in bringing sites forward; including the need for strategic infrastructure provision to enable delivery. An update to the Infrastructure Delivery Study has been prepared and published in June 2021.
- Monitoring of S106 planning obligations and trigger points to ensure timely delivery of key infrastructure and affordable housing provision. Along with all other Local Authorities the Council is obliged to prepare and publish an Infrastructure Funding Statement by the end of the year; work is currently ongoing to review infrastructure requirements to enable schemes to come forward in the future.
- In-depth and detailed monitoring of completions and commitments at Waverley new community, and including ongoing discussions with the landowner Harworth Estates.
- Maintaining momentum and delivery rates on site by ensuring that S106 planning obligations and triggers are achieved in a timely manner; and the delivery of strategic infrastructure provided to meet identified requirements.
- Preparing a protocol for CIL expenditure and decision-taking to ensure the appropriate and timely provision of strategic infrastructure and any gaps in funding, is matched against other Central Government, local and regional funding priorities.
- Ensuring adherence to approved masterplans or refreshing the approved masterplan to reflect subsequent detailed planning permissions.

Implications of the Covid-19 Pandemic for Future Development

1.6 In preparing this Action Plan the Council is mindful of the ongoing Covid-19 pandemic and the three national 'lockdowns' and localised lockdowns imposed by Central Government from 23 March 2020, of non-essential sectors of society to control the transmission rate of the virus. It is only very slowly, from the end of March 2021, that the most recent 'lockdown' is now being eased, following the rollout of a national vaccination programme. Whilst a number of restrictions to gathering together and movement and encouragement for people to return to work whilst staying alert to the transmission of the virus and the need to maintain social distancing and good hygiene to reduce likelihood of transmission have been removed. Some further restrictions remain in place including mask wearing and continued test and trace.

1.7 In addition to its impact on public health, the Office for Budget Responsibility (OBR)⁽¹⁾ highlighted the likely significant adverse effect of Covid-19 on the economy and public finances in the upcoming quarters. The Bank of England Governor has said that the shock to the economy "could prove large". Given such significant and likely implications, it is imperative that this Action Plan reflects on prospective scenarios and the direct, indirect and induced effects arising from the virus in terms of the economy and housing delivery within the borough.

1.8 The OBR have published a further update to the Economic and Fiscal Outlook ⁽²⁾ which notes the continuing uncertainty around the economic outlook. The UK has been hit particularly hard. Following a resurgence of infections over the winter, around 1 in 5 people have so far contracted the virus, 1 in 150 have been hospitalised, and 1 in 550 have died, the fourth highest mortality rate in the world. And GDP fell 9.9 per cent in 2020, the largest decline in the G7.

1.9 The costs of the pandemic have been concentrated in particular sectors, with some, such as hospitality, suffering a 90 per cent fall in output during the first lockdown, while others, such as finance, have hardly been affected. The shock to employment and earnings has also varied greatly across households, with some experiencing dramatic falls in income and rising debt while others, whose incomes were unaffected but whose opportunities to spend were curtailed by lockdowns, have saved unprecedented amounts.

1.10 Government grants and guaranteed loans to businesses have helped to keep viable firms alive and solvent, albeit with higher debts than before the pandemic. However, these interventions have to some extent delayed, rather than avoided, some of the higher unemployment and business insolvencies that will inevitably accompany the withdrawal of government support and an end to government-sanctioned forbearance by creditors, landlords, and tax authorities.

1.11 Uncertainty around the economic outlook remains considerable, with the course of the pandemic still the greatest single risk. A quicker rollout of vaccines with greater effectiveness in reducing infection and illness, the development of new therapies and treatments, or a faster rundown in household savings built up during the pandemic could deliver a swifter economic recovery and less medium-term scarring. Against that, setbacks in the rollout of the vaccines, the emergence of new vaccine-resistant variants, or reduced compliance with residual public health restrictions could force governments back into periodic lockdowns, with more adverse consequences for the economy

1 'Economic and fiscal outlook' published March 2020 (CP 230)

2 March 2021 (CP 387)

in the short and medium term. Coronavirus is likely to reduce both the demand for goods and services in the economy and the ability of businesses at home and abroad to supply them. This will reduce private sector incomes and spending including tax revenues and put upward pressure on government spending to help address the outbreak.

1.12 In March 2020 OBR noted likely economic effects arising from the UK's withdrawal from the European Union have reduced potential output in the economy relative to what would have happened in its absence. In part this reflects lower net inward migration, but mostly it reflects weaker productivity growth on the back of depressed business investment and the diversion of resources from production towards preparing for potential Brexit outcomes. Real business investment has barely grown since the referendum to leave the European Union. The spread of coronavirus will be far wider than initially assumed by OBR, pointing to a deeper – and possibly more prolonged – slowdown.

1.13 If, as a result of Covid-19 and withdrawal from the EU a deep recession does ensue, this will cause layoffs, job losses and sharp falls in spending. If, in due course there is a fall in effective demand for existing and new market homes, this lack of demand for all sale properties will affect the housing chain and the volume and price levels at which house transactions are conducted. Continuing employment is crucial; however, confidence can be supported by the recently released First Homes scheme (04/06/2021) alongside the prospect of low interest rates. Demand for new housing is dependent on maintaining high levels of employment, otherwise delivery rates are likely to stall.

1.14 Whilst this Action Plan, examines the root cause of under delivery of new homes for the year (to end March 2020), and sets out actions that under 'normal' circumstances would address under-delivery, the impact of the Covid-19 pandemic, combined with the withdrawal from the European Union on 31st December 2020 continues to have significant implications for national and regional economies and specifically the success of this Action Plan.

1.15 The council in its adopted Sites and Policies Local Plan, identified a number of small, medium and large sized greenfield housing sites, in sought after locations throughout the Borough, thus boosting its supply of allocated residential development sites attractive to the house building industry. Since Local Plan adoption the number of planning applications for residential development of allocated housing sites has significantly increased. However given that the Housing Delivery Test is based on a rolling three year average, the encouragement given to new house building in the Action Plan and through increases in Council delivery of social housing, is insufficient to enable housing targets to be reached in the short term.

1.16 Commentators⁽³⁾ note that the economic impact of Covid-19 for house building suggesting that any potential gap in housing delivery will mean households being denied homes; housing supply (and the economy) will require a significant boost to delivery; and by applying the tilted balance this will help bring forward new housing sites.

1.17 However other commentators see potential opportunities to approach things differently and not to return to the same ways of doing things that have led to prevalent social inequalities within

3 Lichfields in their blog post: COVID-19: Testing times for housing delivery - hawks vs doves. Matthew Spry 15 Apr 2020

localities and communities. Carys Roberts⁽⁴⁾ petitions for a “green recovery” and advocates a move to a net zero carbon economy.

1.18 The chair⁽⁵⁾ of the Bartlett Real Estate Institute at UCL observes: house builders will be only one of many parts of the economy affected – home purchases will be among the first decisions to be put on hold in the event of both social and economic uncertainty and there will be a fall in transactions. The construction industry is likely to reduce the amount of new homes built thus offsetting the inevitable fall in demand; overall some schemes will be mothballed. However, the continuation of Central Government incentives over the last year, has maintained a healthy housing market for new homes.

1.19 Arising from the pandemic it is inevitable there will be consequent changes within society:

- More continued homeworking will lead to changes in demand for both workspace and the configuration of homes.
- Higher space standards and amenities in apartments as renters and owners in lower quality properties, demand more from it in future
- Fear of food shortages or concerns about the robustness of supply chains may encourage greater self-sufficiency through requirements for gardens, allotments, and other spaces to grow food
- Demand for neighbourhoods that promote health and well-being should increase the popularity of green, mixed, sustainable, walkable places with local shops and amenities nearby
- Likely further urban dispersal of people to smaller towns and polycentric cities and the potential for a rural renaissance.

1.20 The Planner Magazine⁽⁶⁾, asks whether a different approach to housing and public realm could in the future, provide greater resilience in a health crisis, given the psychological change to the way in which we now see our homes. Homes are required to do more than to provide a place to eat and sleep now that we are working in them, working out in them, socialising virtually in them, educating children and managing sickness and recovery in them. Whilst many of the Covid-19 pandemic restrictions that have been placed on society are now being retracted, given the successful roll-out of the vaccination programme, many office workers continue to remain at home, this impacting on the health and attractiveness of local town and city centres.

1.21 The author identifies the need to ensure access to good-quality open space, natural light, storage, flexibility in floor plan, adequate space for washing and drying of clothes, views of green space and trees, be adequately integrated into the design of new homes.

1.22 The ongoing nature of the Covid-19 pandemic and its impact on society does however provide an opportunity to review those things of value to us; it has brought into sharp relief the issues of health poverty and social deprivation and the impacts on society if these are not tackled during times of relative stability. There are many economic sectors such as tourism, hospitality and the retail sector that have been significantly and negatively impacted since March 2020, and this continues to be the case.

4 Executive Director of the Institute for Public Policy Research; Guardian 03 06 2020

5 Yolande Barnes, Housing Today 16 March 2020, 'How COVID-19 will impact residential development'

6 Simon Wickes: The Impacts of the Coronavirus on the Way We Plan our Living Environments, June 2020

1.23 It has been noted that the supply chain of building materials, timber, glass, plastics is significantly impacted by the pandemic, through their manufacture and importation problems. The lack of development materials gives rise to increases in cost pressures that will lead house builders to re-appraise their pricing structures. The break in the supply chain of clay bricks and blocks and the loss of a skilled workforce in these industries will also lead to increases in the cost of building materials and the continuous delivery of completed dwellings.

1.24 House builders might also take this opportunity to re-assess the housing mix; the size, type of homes, and density of development, to create potential office spaces within the home. Short term impacts arising from the pandemic could be bolstered by the new First Homes initiative; although this initiative may impact on the supply of social rented and intermediate affordable housing products in the longer term. Rotherham Council is seeking to adopt the National Space Standards to ensure that problems arising from the small size of new affordable homes are minimised.

1.25 Maintaining low interest rates provides a substantial buffer to the housing market and maintains downward pressure on mortgage payments; but it is the level and rate of unemployment that is critical to those who would have considered purchasing a new build home and the re-sale of homes from existing stock.

1.26 Greenfield sites have fewer barriers to development, and the Local Plan promotes a mix of sizes of allocation sites. Medium sized schemes have better prospects for coming forward in the short term than major schemes, especially if the latter need considerable on and/or off-site infrastructure.

1.27 Unfortunately, it will be the identified brownfield sites, especially those with known site conditions, that are unlikely to deliver full policy compliant Affordable Housing on site and may even struggle to deliver any housing without public sector grant intervention. Evidence from the recently published RMBC Housing Development Viability Appraisal Refresh Study (2019), confirms that the worst of these sites have more limited viability to fund full policy compliant affordable housing provision and, it is highly likely they may struggle to come forward for market sale housing in such a climate without some form of grant funding. These sites are often in locations that are at the lower end of the market and less attractive to private developers.

1.28 Potential actions to assist in their delivery could include:

- Major promotion of small/medium sized greenfield sites; especially those not requiring major off-site infrastructure; through negotiations and discussions with the development sector.
- Consideration of potential initiatives needed to encourage delivery of new homes on brownfield sites through public sector grant aid funding and/or purchase of the sites to bring forward social housing. Three schemes within Rotherham town centre promote such an approach these are detailed later in this Action Plan.
- The Council has reviewed and published an Infrastructure Delivery Study that has assessed the needs for strategic infrastructure and reviewed the potential funding opportunities for such schemes and consider how the Community Infrastructure Levy (CIL) receipts can help to deliver solutions to bring forward sites in need of infrastructure. There will be a need to identify other/external funding schemes to enable delivery on site.

1.29 In some circumstances the Council can and will work collaboratively with other organisations to resolve outstanding issues and provide every opportunity for development to come forward. Future Actions to assist in delivery could include:

- Bring forward land in Council ownership for market sale or for development with partners to meet needs in specific locations, to build investor confidence in that locality and to attract other private sector developers into the area.
- Seek public sector grant funding to provide site/strategic infrastructure to enable development opportunities to proceed.
- Focus on resolving constraints through timely strategic infrastructure delivery, to enable development on specific sites.
- Encourage the provision of essential utilities infrastructure to enable sites to come forward for development, including drainage/sewerage connections and essential extensions to Waste Water Treatment Works or the supply of fresh water.
- As a tool of last resort, compulsory purchase powers can be utilised to bring forward land allocated for development where there has been no activity by the owner/developer, and lack of activity is preventing a defined scheme from being implemented.

2 Key actions and responses

2.1 In preparing the current update to the Housing Land Supply position, a review has been undertaken of potential issues affecting delivery on site and the Council recognises that actions to enable delivery in a timely manner may be required. Potential actions are noted below.

2.2 The tables in Appendix two provides a summary of the activities the wider Council is currently undertaking in Rotherham Town Centre and Housing Market Area, on edge of centre sites and other brownfield sites within Rotherham urban area, to tackle issues pertinent to vacant and derelict brownfield sites. The council has identified a need to provide additional affordable social rented and shared housing to meet needs; promote developer and buyer confidence; and to increase the overall supply of new homes in the Borough and to start to build up its stock of social housing lost through Right to Buy.

2.3 Developing housing land is a complex process and there are other factors that determine why housing sites do not come forward; many of which are beyond the control of the Local Planning Authority. It therefore requires a broader, collaborative approach to be taken with stakeholders to increase the delivery of new homes and the use of other available tools which go beyond the traditional remit of the Local Planning Authority.

Successful actions the Council is taking

Understanding and reviewing the evidence to guide future activity

- The preparation of the joint Strategic Housing Market Assessment with Sheffield City Council and CRESR (Centre for Regional Economic and Social Research) at Sheffield Hallam University. Publication of this research January 2020. The SHMA identifies that affordability of new homes is a key concern for Rotherham; delivery of new affordable housing, through clear programmes by the Strategic Housing and Development Team will assist in responding to this issue.
- Work to investigate the viability of brownfield and greenfield sites and to prepare Affordable Housing and Development Viability Supplementary Planning Documents (SPDs). These two SPDs were adopted by Cabinet 21/06/2021, and provide greater clarity to the house building industry regarding the requirements for affordable housing and other S106 planning obligations; they will assist developers in preparing their planning application submissions and enable the Council to robustly defend its planning policy requirements. The council is also preparing a further draft SPD: Development Contributions and the Delivery of Strategic Infrastructure for consultation later in 2021.

Local Planning Authority activity

- Within the Planning Service, planning officers' work with the development industry to ensure high-quality, policy compliant schemes are delivered in a timely manner. Housing developers and their agents have regard to issues associated with developing out a site at a suitable pace of delivery and meeting appropriate trigger points identified in S106 planning obligations.
- The Council has a realistic understanding of the costs and values associated with bringing land forward for development and an understanding of realistic residual land values and profit levels

whilst factoring in the requirements and obligations of Local Plan policy. In each site circumstance the Council has an understanding of the density and type of development required to meet local needs, the anticipated pace of delivery and the willingness of developers to bring sites forward once planning permission has been granted. Regular contact with the development industry shall, in future, be factored into work programmes to ensure key concerns are highlighted early in the process, solutions sought, and problems resolved. A paid pre-application service is a cornerstone of the Development Management process in this Local Authority.

- Housing delivery objectives, underpinning the adopted Local Plan, depend on having sufficiently de-risked suitable sites that are viable to meet demand for market and affordable housing.

2.4 The action plan sets out a range of positive actions that the Council has already taken to increase the supply of new homes and support the delivery of the types of housing needed. The Council will continue to pursue these actions over the coming months.

New actions the Council will take as a result of this Action Plan

Bringing forward inactive sites

- The Council will work with landowners and developers to promote delivery of “inactive sites”. The Council’s Strategic Housing and Development Service aims to support delivery against the over-arching annual housing target by helping to unlock inactive sites, particularly those with scope for affordable housing delivery.
- The Council has undertaken strategic acquisitions from private developers. The benefits of this approach are twofold: it assists the Council in meeting its affordable housing need and provides a secure market sale to developer’s.
- Identify inactive sites using data gathered from a variety of sources including the Brownfield Land Register, monitoring of allocated housing sites within the Local Plan, and the identification of sites where development has not commenced but planning permission has now expired and any other sites alerted to the council through discussions with landowners, developers and Members.
- Maintain an up to date pipeline for intervention opportunities; and a casework system and passport for each site containing all supplementary information and records of all communication relating to the site, has been established. This approach enables officers to promote these sites to potential house builders.
- A site assessment template is regularly updated and records standardised information (planning reference, visuals from site visits; contact information and date and brief details when initial contact is made). An accompanying progress log records all actions and activities regarding the site. In collating this information, the Service has developed an intervention toolkit to be used to engage and support landowners and developers in bringing their sites forward.
- The Council alongside developers and landowners working together with strategic infrastructure providers, will work closely to deliver growth, provide strategic infrastructure and meet other policy requirements in as cost-efficient way as possible. Suggestions include:

- Flexible approach to allow for staged developer contribution payments, especially for brownfield sites which potentially may experience marginal viability issues.
- Lower levels of affordable housing on site, or provision off-site or developer financial contributions where viability levels are such that to require full policy compliant affordable housing provision would render the site undeliverable.
- Public sector support to bring forward sustainable vacant brownfield sites within existing communities and close to services and facilities.

2.5 The Council's Strategic Housing and development Service will continue to engage in a range of activities to increase the number of new homes, including:

Directly Building Affordable Homes

2.6 The current programme is principally funded by the Council's Housing Revenue Account (HRA) with some grant support from Homes England and the Sheffield City Region. As well as homes for council rent, the Council continues to build shared ownership homes and homes for open market sale; developed under Rotherham's 'Rother Living' brand. The sales receipts from these new homes will help to fund Council rented homes on more difficult and expensive to develop sites.

Selling Land to Housing Associations and Small and Medium Enterprise (SME) Developers to Build Homes

2.7 As well as direct delivery, the Council actively works with developers and housing associations to bring forward Council land for housing development, providing the best possible schemes for the local area based on need and demand. One prominent scheme is the sale of two sites in the Dalton / Thrybergh area of Rotherham which will bring forward a regeneration scheme on land which has been derelict for a number of years. The sale, made by informal tender is an innovative initiative brought forward by Engie, in collaboration with Sanctuary Housing Association, Great Places Housing Association and Wise Living to deliver approximately 237 homes including Shared Ownership, Affordable Rent and Market Rent. Further details on Council enabled delivered can be found in Appendix two.

Purchasing Homes from Developers Delivered Through S106 Planning Obligation

2.8 Strategic acquisitions will also continue to form an important part of the Council's housing delivery programme, the current programme forecasts that almost 50% of the Council's new stock will be comprised of strategic acquisitions. The Council also intends to approach developers regarding additional opportunity acquisitions over and above the S106 provision; acquiring additional units will help accelerate delivery of developments which may have slowed down following the Covid-19 pandemic, giving increased certainty to developers.

Working with the Private Sector to Unlock Delivery on Inactive Sites

2.9 The Council's Strategic Housing and Development Service organises the annual Housing Developer Summit. Traditionally, the Summits have been held at the New York Stadium and since 2016 have grown in significance and popularity however this year, a physical event will not be feasible due to Covid-19. The fifth annual Summit will be held virtually on 30th June 2021 and will be based around three key themes: The Power of Partnership working – showcasing the Chesterhill Avenue

/ Whinney Hill development; Future Opportunities – focus on the Town Centre as well as site opportunities in the 21/22 Housing Development Programme; and The Climate Change agenda – how the Council is responding and how it impacts on housing going forward.

2.10 As well as the annual Developer Summit, the Council engages with developers on a regular basis through soft market testing opportunities, access to key officers to discuss specific sites, promotion of sites and quarterly e-bulletins. Quarterly e-bulletins were first launched in Summer 2019 and are sent to a mailing list of over 600. An example of a recent bulletin can be seen in Appendix one.

Working Closely with Homes England and the Sheffield City Region to Attract Grant Funding to Increase and Accelerate Housing Delivery

2.11 The Council is working closely with Homes England to deliver a number of Shared Ownership and Affordable Rent schemes across the borough.

2.12 Through the Sheffield City Region (SCR) Brownfield Housing Fund, the Council will be able to bring forward a number of Council owned small sites and continue to deliver more residential development in Rotherham town centre, thus contributing to achieving the Town Centre Masterplan ambitions.

2.13 Working with Homes England and the SCR has opened up sites which have previously been stalled in the past. It has also enabled the Council to offer new tenures such as Shared Ownership and Open Market Sale as well as build house types which are in high demand (e.g. bungalows, apartments, accessible homes).

2.14 The Council has a target for the 'number of homes delivered as a result of council intervention'. The out-turn was 177 against a year-end target of 175 for both 2019/20 and 2020/21 respectively, and a more ambitious target of 225 has been set for 2021/22. Details of which can be found in Appendix two.

2.15 While the Council will continue to take every possible action to increase and accelerate delivery to meet housing need, there is also an important emphasis on quality and placemaking, and meeting the climate change agenda. The Council is currently assessing its strategy to achieve both net zero-carbon emissions for new homes and retrofitting existing stock that falls below an EPC band D rating. A Green Housing Road Map is being produced which will set out housing will contribute to the Council goals of achieving:

2.16 • Council's carbon emissions to be at net zero by 2030 (NZ30)

2.17 • Rotherham-wide carbon emissions to be at net zero by 2040 (NZ40)

2.18 The Council's current developments within the Town Centre are aiming to achieve an EPC rating of B. This will have a positive impact on its residents and the homes will become more affordable with the reduction in energy bills.

Consultation with the development industry

2.19 Whilst there is no requirement to consult on the Housing Delivery Test Action Plan, the Council recognises the value of engagement with housing developers, their agents and housing associations and is committed to working with such organisations to ensure the needs of its residents are met in the future. Therefore, all opportunities will be taken to engage with these bodies and organisations over the coming months to ensure delivery of the right type, size and tenure of new homes to meet local housing needs.

3 Background

3.1 The National Planning Policy Framework (February 2019) introduced a Housing Delivery Test. The first results of the test were published in February 2019 and showed that Rotherham had achieved 92% of its required housing delivery. In February 2020 the results of the test reveal that this borough achieved 85% of its target and in 2020 the Borough achieved 88% of its target. The Council is therefore required to publish a further Housing Delivery Test Action Plan analysing the causes of under-delivery and setting out the actions it proposes to take to remedy this situation.

3.2 Details regarding completions and commitments are provided in the Addendum to the Strategic Housing Land Supply Assessment (SHLAA) 31 March 2019, that will be published to accompany this Action Plan later in the year. The Five Year Land Supply position against this target is published in the Annual Monitoring Review. In adopting its Sites and Policies Local Plan in June 2018, the Council allocated sufficient housing sites to meet the five year target.

3.3 The action plan demonstrates the Council's commitment by responding positively to the challenge of increasing housing delivery.

3.4 The action plan assesses delivery rates and analyses the root causes for identified under-delivery; it reviews key issues and challenges in meeting the Borough's housing delivery target, and identifies the response and actions the Council proposes, to provide the right circumstances for increased house building in the Borough.

3.5 The Council prepares an Annual Monitoring Report (AMR) on all key monitoring indicators of its Local Plan. This action plan builds on the AMR process and integrates other sources of information.

3.6 To support the preparation and adoption of the Local Plan the Council prepared a Strategic Housing Land Availability Assessment (SHLAA), this was subject to a round table discussion. Housing Land Supply update and five-year Housing Land Supply updates are available from the Council's Planning Policy web pages.

Relationship to other Plans and Strategies

3.7 Rotherham Metropolitan Borough Council is located within the Sheffield City Region and for the purposes of this action plan the following are the most important documents, published by the City Region:

- Sheffield City Region Strategic Economic Plan 2015-2025
- Sheffield City Region Transport Strategy 2018-2040

3.8 The following is a list of all appropriate documentation prepared and published by Rotherham Metropolitan Borough Council:

- Second Addendum to the Strategic Housing Land Availability Assessment (SHLAA) 31 March 2017: Housing Land Supply Position Updated to 31 March 2021 (to be published later this year).
- Council Plan 2019-2020

- Rotherham Housing Strategy 2019-2022
- Rotherham Metropolitan Borough Council Transport Strategy 2016-2026
- Rotherham Economic Growth Plan 2015-2025
- Town Centre Supplementary Planning Document (SPD)
- Town Centre Masterplan

3.9 During 2019/2020 the Council prepared various Supplementary Planning Documents that have now been adopted (June 2020). Several draft supplementary planning documents have also been prepared for consultation purposes and were consulted on in August / September 2020 and adopted June 2021. Together SPDs along with the Local Plan, guide the preparation and submission of future planning applications.

3.10 The action plan draws on studies such as the Rotherham/Sheffield Strategic Housing Market Assessment (SHMA) (2019) and the Housing Development Viability Appraisal Refresh Study (2019) which uses site allocation typologies to draw pertinent conclusions.

3.11 The action plan has been prepared in partnership with other services within the Council including the Strategic Housing and Development Service and the Council's Asset Management Team responsible for the management and sale / re-use of identified sites and buildings that are demonstrated to be surplus to requirements.

3.12 The methodology adopted is a synthesis of several work streams and pulls together various strands of information from different evidence base sources; it identifies actions the Council is already undertaking. It also presents an analysis of what has happened since the preparation and adoption of the Local Plan; the engagement undertaken with the development industry and landowners at that time.

3.13 The Council has prepared a comprehensive Strategic Housing Land Supply Assessment (31/03/2017) to provide a clear understanding of all sites committed at that time (under construction and with planning permission) and those proposed to be allocated in the Local Plan; it also identifies non-Green Belt sites both with and without constraints potentially suitable for residential development.

3.14 An addendum update to the SHLAA prepared 31 March 2018 supports the first HDTAP and a further addendum updating the position to 31 March 2019, are available to download from the Council's website. Further updates will follow later this year for the years 2019-2020 and 2020-2021.

3.15 The SHLAA draws together all relevant information discussed with participants during the independent examination of the Sites and Policies Local Plan. The Council consulted on its methodology and housing land supply documentation during the examination, and the Government-appointed Inspector considered all comments made in writing and during round table discussions at that time. Subsequent to this the Council is fully engaging with potential developers/ landowner or their agents at pre-application stage and at subsequent planning application stage.

3.16 The Council recognises and values engagement with landowners, housing developers, agents, and housing associations. The most recent activity conducted during the examination of the Local

Plan, demonstrates the Council's commitment to working with all organisations and bodies to ensure the needs of its residents are met in the future. All opportunities will be taken to engage with developers and their agents over the coming months to ensure delivery of the right type, size and tenure of new homes to meet local housing needs.

3.17 The first action plan in 2019 summarised the engagement and in-depth review of sites during the allocation of residential sites in the Local Plan. Since publication of the first action plan, the Council has undertaken Developer Summits with house builders, developers and their agents. However, detailed analysis of all available sites with the house building industry has not been undertaken subsequent to Local Plan Examination.

3.18 The action plan notes the time required for landowners seeking outline planning permission and subsequent sale of site and grant of full or detailed planning permission to a developer who will deliver homes on site, these timing constraints are reflected in the five year supply. Support for these assumptions is included within the Inspector's report of the Rotherham Sites and Policies Local Plan examination.

3.19 Paragraph 62 of the Inspector's report, notes the re-assessments undertaken by the Council, the likelihood of development on the various housing sites, the number of dwellings likely to be delivered on each site, and when they are likely to be built. The Inspector considered that the careful and pragmatic analysis carried out for each of these sites is reasonably based and produces a fair estimation of what is likely to be delivered on site and when this will happen.

3.20 Paragraph 63 notes the need for ongoing monitoring to ensure housing delivery proceeds as anticipated. Further paragraph 80 notes the provision of extensive detailed evidence relating to the five year supply. This includes substantial land allocations for development, estimates of site capacities, likely timing of release, and realistic assessment of build-out rates. The Inspector concluded that the Council is committed to ensuring sufficient housing land is provided, at the appropriate time to meet anticipated needs.

3.21 Evidence base research and surveys were conducted in conjunction with specialist officers within the Council with support from consultancies with specialist skill sets. The site-based evidence was systematically reviewed and recorded for submission to the Local Plan examination.

3.22 A desk top review of potential sites was conducted including a review of previous submitted planning applications, and subsequent site visits to consider the landscape, geography, topography and visual constraints were undertaken; this analysis of noted constraints aided understanding of the site and its potential for allocation. Site visits by officers within the Planning and Strategic Housing Service continue to be undertaken on a regular basis.

3.23 All site-based evidence was reviewed and key issues collated as Site Development Guidelines in Chapter 5 of the Sites and Policies Document. This review and analysis included preparation of the following studies: Integrated Impact Assessment; transport assessment; Green Belt Review; impact on the natural environment / historic environment / archaeology / landscape impact and the impact of surface water flooding.

3.24 In determining planning applications for Local Plan allocations, the Council uses its established evidence base and is guided by the site development guidelines. In the preparation of this action

plan ongoing site monitoring, guides the Council in reviewing delivery rates and aids investigation into causes of possible under-delivery. This approach to understanding the site allocations enables clear analysis of issues of delivery and assists in the identification of potential actions to unlock development.

3.25 The Infrastructure Delivery Study has now been refreshed and published June 2021 and assesses the requirements for strategic infrastructure to enable sites to come forward for development. Along with all other Local Authorities the Council is obliged to prepare and publish an Infrastructure Funding Statement by the end of the year (December 2020), this Statement was published in December 2020.

3.26 This action plan includes sections on the following:

- Local housing market delivery and analysis.
- Review of key issues and challenges.
- Actions and responses.
- Management and monitoring arrangements.

4 Housing delivery analysis

Local Plan context, completions and commitments

4.1 Section 3 of the Core Strategy (adopted 10 September 2014) sets out the Strategy relating to Rotherham; the most relevant elements of this strategy include:

- managing the impact of an ageing population on future housing need, the location of development, accessibility to services and facilities and the provision of health and social care facilities across the borough;
- encouraging development in the areas of greatest deprivation in Rotherham Urban Area: Dinnington and Maltby;
- meeting housing needs of local people;
- improving housing quality and choice of dwellings of different size, type, tenure and affordability;
- encouraging public transport usage.

4.2 An extract from the Local Plan Vision for Rotherham states:

"Rotherham will be prosperous with a vibrant, diverse, innovative and enterprising economy. It will fulfil its role as a key partner in the delivery of the Sheffield City Region recognising the close economic, commercial and housing markets links with Sheffield and our other neighbouring authorities. Rotherham will provide a high quality of life and aspire to minimise inequalities through the creation of strong, cohesive and sustainable communities. ..."

4.3 Core Strategy policies support existing communities and ensure new development contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

4.4 Core Strategy Policy CS1 'Delivering Rotherham's Spatial Strategy' states:

"Most new development will take place within Rotherham's urban area and at Principal Settlements for Growth. At Principal Settlements and Local Service Centres development will be appropriate to the size of the settlement, meet the identified needs of the settlement and its immediate area and help create a balanced sustainable community. Our strategy will make the best use of key transport corridors, existing infrastructure, services and facilities to reduce the need to travel and ensure that wherever possible communities are self-contained..."

4.5 Policy CS6 'Meeting the Housing Requirement' states:

"Sufficient land will be allocated in the Sites and Policies document to meet Rotherham's housing requirement ... The following principle(s) will be applied to the allocation and release of these sites:

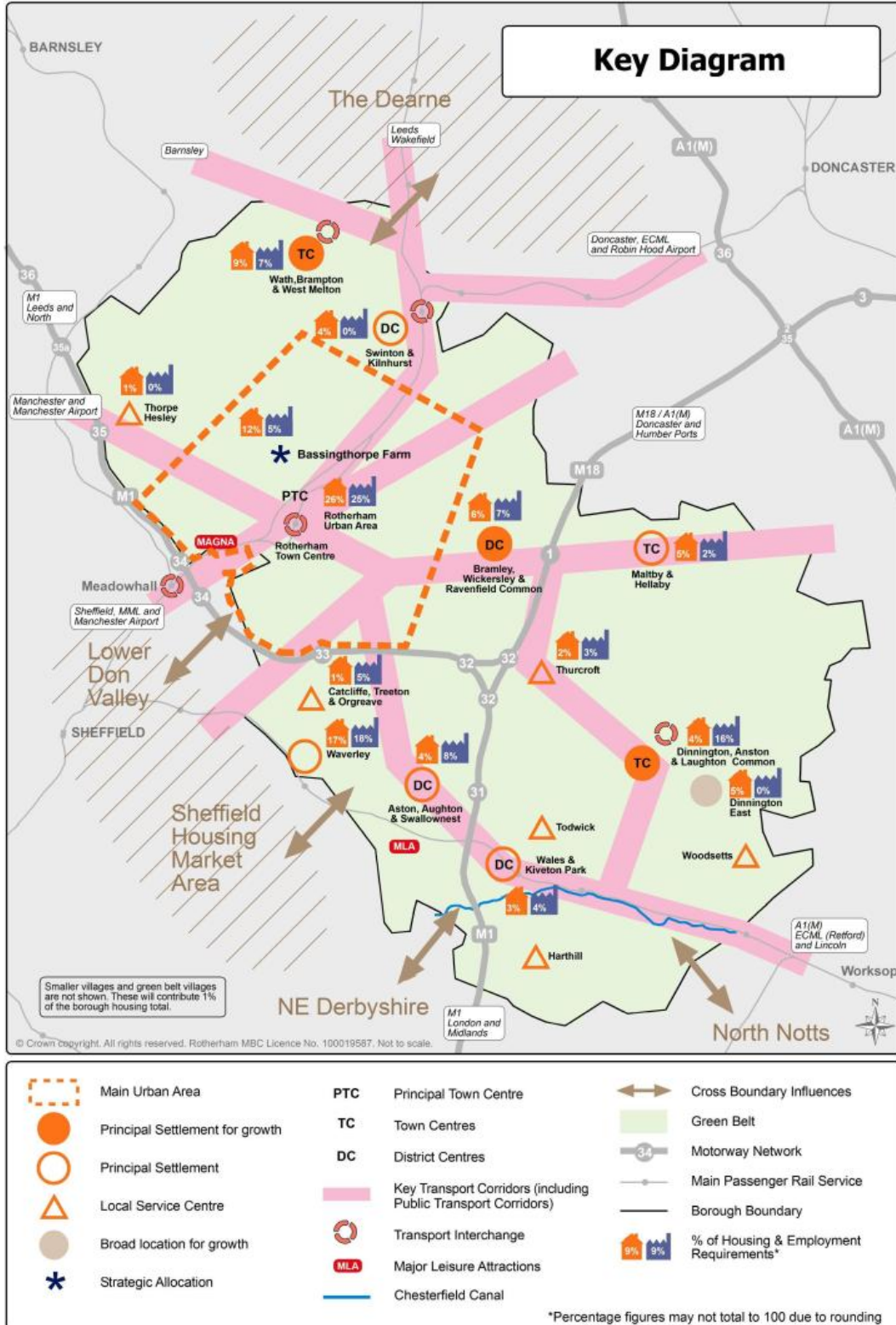
New allocations will be distributed according to the Spatial Strategy set out in Policy CS1 Delivering Rotherham's Spatial Strategy..."

4.6 The Key Diagram (Section 5.1 of the Core Strategy) outlines the borough-wide spatial strategy. It is included below. Policy CS1 'Delivering Rotherham's Spatial Strategy' clearly identifies the settlement hierarchy and the main locations for growth. It also allocates a new sustainable mixed community at Bassingthorpe Farm and provides enough evidence to justify the removal of this strategic allocation from the Green Belt. The policy also proposes a broad location for growth to the east of Dinnington, although no Green Belt land release, to that effect, was made in the Core Strategy.

4.7 The Sites and Policies Document together with the Core Strategy is the Rotherham Local Plan and together the Local Plan provides a long-term strategy for the borough setting out all policies and proposals for new development.

4.8 Policy SP1 of the Sites and Policies Document identifies land allocations to meet the development requirements of the spatial strategy. To support adoption of the Local Plan the Council undertook a Green Belt review and allocates land formerly within Green Belt to meet identified housing needs. Preparation of a two-part Local Plan delayed delivery of new homes against the Core Strategy housing requirement target.

Figure 1 Rotherham Local Plan: Core Strategy Key Diagram



4.9 The Housing Delivery Test uses a lower requirement figure for Rotherham than the Core Strategy⁽⁷⁾, and currently uses the 2014 based household projections. The Core Strategy target is derived from the 2008 based sub-national household projections. Monitoring data from 2013/14 demonstrates that housing completions in Rotherham have yet to meet or exceed the annual Core Strategy requirement. Considering its performance on housing delivery against the Core Strategy target, the revised NPPF and the new Housing Delivery Test, the Council has resolved to commence a partial update of the Core Strategy. A Local Plan timetable was published January 2020.

4.10 The Core Strategy was adopted more than five years ago and undertook an assessment of policies within the Core Strategy to determine if they are still up to date and fit for purpose. A report presented to Council Cabinet on 8th July 2019, recommended a partial review be undertaken. At this meeting the housing target set out in Policy CS6 'Meeting the Housing Requirement' was rescinded and the Council uses the up to date HDT target provided by Central Government as its measurement of need.

4.11 The standard methodology produced by Central Government, results in a minimum requirement of circa 532 net new dwellings per year in Rotherham. This requirement is 426 dwellings lower than the Core Strategy requirement of 958 dwellings per annum.

4.12 The local housing need figure is significantly lower than the Core Strategy requirement. The importance of partially updating the Core Strategy is therefore essential to establishing a realistic plan requirement for HDT and maintaining a five year housing land supply in the future.

4.13 The Annual Monitoring Report 2020 provides summary information relating to housing land supply and completions since the Core Strategy base date March 2013, and the following is an extract against which the HDT has been assessed:

Table 1 Rotherham dwelling completions 2015/16 – 2019/20

New dwelling completions per financial year				
2016-17	2017-18	2018-19	2019-20	2020-21 *
605	472	422	556	549

* Data from 2020/21 is not considered in calculating the HDT results for January 2021 but is helpful in looking forward to possible future requirements to prepare an action plan in subsequent years.

4.14 Rotherham's HDT result demonstrates that higher housing completions against the target in the last two years' 2019/20 and 2020/21, are now being achieved. The initial slow start was mainly due to the time lag between adoption of the Sites and Policies Document (2018) and new housing sites coming through the planning system, gaining planning permission and development commencing on site. The time lag issue was exacerbated in Rotherham as Green Belt land releases were required, and the subsequent adoption of site allocations, enabled planning permission to be granted.

4.15 During the past year, the Council has undertaken further research and forensic examination of its small sites. The Council was becoming increasingly concerned that the commitment figures

7 In accordance with the Housing Delivery Test Rule Book:
<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

for small sites appeared to be too high for the number of completions achieved and did not appear to be in accord with previous monitoring data. By undertaking in-depth research using Local Land and Property Gazetteer, Council Tax records, street naming and numbering, and Google street view, with additional site visits where these were deemed necessary, the Council estimates that a further 260 completions should be counted for all small sites in the Borough. Final verification of this figure is still required. Previously the Council has relied on the issuing and recording of completion certificates; however the Council can now confirm that further to the in-depth research set out above, reliance on the use of completion certificates are not an accurate record of all dwelling completions in this Borough. In addition some private building inspector's do not provide copies of completion certificates to the Council which means that many dwellings that are completed on small sites are not recorded.

4.16 The Housing Delivery Test measures the number of new homes required over a rolling three-year period. The methodology for calculating the test is set out in the Government's Housing Delivery Test Rule Book with further detail set out in the Housing Delivery Test: 2018 Measurement Technical Note. The test calculation uses two components, housing delivery and housing need. Housing delivery looks at past performance of the last three years of net additional dwellings.

4.17 The Housing Delivery Test result for Rotherham is 88% this year, therefore the Council is required to publish a further action plan analysing the causes of under delivery and setting out actions to remedy this situation. Rotherham is far from unique in having to do this:

4.18 • 33 councils must publish an action plan.

4.19 • 19 councils must add an extra 20% to their five-year supply of housing land.

4.20 • 55 councils have the "presumption in favour of sustainable development" applied.

4.21 The remaining 217 councils have passed the test.

4.22 The results published in February 2020 for Rotherham are shown below and whilst the Council must prepare a revised action plan, it has avoided having to add an extra 20% to the housing land supply.

Table 2 Housing Delivery Test Results for Rotherham

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2020 result
2017-18	2018-19	2019-20		2017-18	2018-19	2019-20		
546	579	532	1,657	472	422	556	1,450	88%

Rotherham Housing Delivery Context

4.23 Wider market conditions and developer confidence are also significant factors; delivery on sites has until recently relied on the completion of small sites and Waverley new community. All previously committed site allocations of the Unitary Development Plan have now been or are nearing final completion. There have also been one or two windfall sites that have come forward on brownfield

land and other building conversions such as at the Humphrey Davy School of Nursing and the Rockingham Centre in Wath to residential uses.

4.24 Ongoing housing delivery at Waverley is robust, however during the past year, the Council has undertaken further research and forensic examination of completions of all parcels at Waverley, the commitments remaining and, has assessed the actual supply of new dwellings against those anticipated at the time of the original grant of outline planning permission. The completions achieved have also been assessed against the signed S106 Planning Obligation and any variations to that S106 planning obligation. Work continues to further understand the implications of not achieving the full capacity of this site, as originally permitted. Discussions are ongoing with the landowner Harworth Estates, but the anticipated 3,890 dwellings cannot be achieved on the originally permitted site although there may be opportunities to include further windfall sites from the adjacent Highfield Commercial Mixed Use allocation and by the re-structuring of the original outline planning permission to remove a public transport interchange and to rely on delivery of one school rather than two schools.

4.25 Lower achieved capacity on site will not impact on the five year supply of housing land.

4.26 The Housing Land Supply Monitoring Report will be published shortly and will review dwelling completions, capacity, density and delivery of all sites in a range of sizes and locations throughout the Borough. It also predicts growth in coming years. This detailed information provides the Council with a greater understanding of potential delivery rates on larger sites per house builder; the density and capacity of greenfield, edge of urban and brownfield urban sites; and delivery rates for affordable housing achieved through planning policy S016 requirements.

4.27 In addition to the Strategic Allocation at Bassingthorpe Farm for approximately 2,400 new homes as detailed in Core Strategy policy CS1; policy SP1 of the Sites and Policies Document, allocates additional sites for development. Table 2 of Policy SP1 'Sites allocated for residential use' refers.

4.28 An update to the Strategic Housing Market Assessment (SHMA) has now been completed and published. This Study was a joint commission with Sheffield City Council; the two Councils appointed consultants CRESR (Centre for Regional Economic and Social Research) at Sheffield Hallam University, to undertake the work. The SHMA provides important evidence, in the form of a report and associated data sets, about the housing market that the Council can use in the development of its future housing policies and strategies and to guide future housing delivery.

4.29 In summary, the SHMA headlines for Rotherham are as follows:

- There are higher than average numbers of households with dependent children.
- There are 11,422 existing households looking to form in the next three years.
- Average house prices have risen significantly with an increase of 17% over 5 years, but income (gross weekly pay) has only increased by 10% over an equivalent period of time.
- Large proportions of first-time buyers are priced out of the market, even at lower quartile prices and in Rotherham this equates to 76%.
- 76-89% of newly forming households cannot afford to buy.

4.30 In conclusion, there is an under supply of housing, generally, and the shortfall of affordable housing is not being fully addressed. The demand for affordable housing has increased threefold when compared with the previous SHMA.

4.31 Several trends align to give an increase in this shortfall. These include:

- General increases in need, amongst existing households.
- Affordability problems caused both by high rents and prices in some sub-markets, and low and static household incomes, sometimes in combination.
- Forecast increases in the levels of homelessness.
- Continuing increases in the number of affordable units lost through the Right to Buy.
- A decline in the level of social housing re-lets.

4.32 CRESR's assessment is that the combination of a policy environment driving increased socioeconomic inequalities, worsening affordability, and the diminished supply of social rented homes, means that the great majority of new affordable housing provision in the SRHM should be for social rented housing. The need for affordable housing is separate from the overall housing need figure for planning purposes however, and the two cannot be compared.

Development costs, values and viability

4.33 In preparing its Local Plan, the Council published a supporting Infrastructure Delivery Study, prepared by Roger Tym and Partners 2012. This Study has now been updated and published in June 2021, by consultancy team: Hyas, Richard Wood Associates and Fore Consulting, and identifies the strategic infrastructure, supporting services and community facilities required to meet the needs of new and expanding communities. T

4.34 The Community Infrastructure Levy (CIL) came into operation in this Borough, on 3 July 2017. The introduction of CIL, with its differential rates, introduces a cost that affects a site's land value estimate.

4.35 Reference to Core Strategy policy CS32 Infrastructure Delivery and Developer Contributions is also relevant. The preparation of the refreshed Infrastructure Delivery Study has enabled refresh of the schedule of key priorities in the Borough to be updated.

4.36 A Housing Development Viability Appraisal Refresh Study (2019) exploring the viability of delivering affordable housing was published in June 2020. This study also supports the preparation of the Supplementary Planning Documents: 'Affordable Housing' and 'The Preparation of Site Based Development Appraisals: Contesting Viability' adopted by Cabinet on 21 June 2021. It also support the preparation of a forthcoming draft SPD on Developer Contributions to be consulted on later in the year.

4.37 Overall, Rotherham has delivered its Local Plan affordable housing policy requirement, (CS7 Housing Mix and Affordability refers) over the last decade. Any deviations from the policy requirement were justified by specific site matters, whether this relates to a lack of viability or where the planning

authority has negotiated a different housing mix or an off-site commuted sum that had been judged to be equivalent in planning policy terms. It also reveals that the planning authority has been flexible and respectful of market conditions and site-specific matters that can affect both viability and the ability of a site to deliver its quotient of affordable housing in accordance with local plan policy.

4.38 The viability study considers changes in market conditions and examines the viability of a selection of sites (site typologies) and their ability to deliver policy compliant affordable housing within wider scheme development. It sets out potential options for consideration in circumstances where some sites are not viable. For instance, through the negotiation of a lower level of affordable housing on site; deferment of provision until later phases of development; or no provision without additional funding.

4.39 A benefit of this study is the increased level of understanding of the potential for site allocations to fund essential strategic infrastructure, in addition to payment of the Community Infrastructure Levy, and to provide affordable housing to meet policy requirements. It enables the Council to defend its policy position on many greenfield sites. Consideration continues to be given to the impact of Covid-19 on longer term housing delivery and the size, type and tenure of new homes to be delivered.

4.40 The new study critically examines the principal variable inputs and assumptions applied in previous studies. The two most influential variables in affecting the land value estimates (i.e. the residual land valuations) are house prices and build costs. Therefore, the extent of the changes in these variables has been identified; by reviewing house prices achieved on residential schemes - built out - and for sites currently under construction; it also draws on new data sets published by the Office for National Statistics. For the build costs, up-to-date inputs from Build Cost Information Services (BCIS, 2018) as well as data sets measuring changes in these sums over time have been accessed.

4.41 The refreshed study presents the variables and assumptions applied in previous studies and sets out the changes to be applied moving forward. The evidence base examines the rate of delivered affordable housing compared to the Council's policy position; this provides a good indication of the extent and scale of derived benefit arising from contesting viability.

4.42 The Evidence Base Refresh study presents findings from twenty-seven site appraisals: these are the site typologies, selected to represent the pool of sites located across Rotherham's six housing market areas. Sixteen of these sites are greenfield and eleven are brownfield sites.

4.43 All the appraisals are site-based which take into account site-specific factors that influence their development potential, the local market context, the sites' condition, and the Council's extant planning and housing policy requirements, in accordance with current national guidance.

4.44 In-depth research reveals that green field sites are viable with the potential to deliver a higher proportion of affordable housing than policy demands. This is crucial given that the adopted Local Plan has allocated substantial greenfield (formerly Green Belt) housing sites.

4.45 However, this cannot be said for the majority of brownfield sites, many of which (although not all) are in council ownership and are allocated in the Local Plan. The appraisals demonstrate that many of these sites may incur difficulties in getting built out in the future, as they are derelict or vacant and remain undeveloped for at least the last decade.

4.46 Their continuing inclusion in the adopted Local Plan to meet the planning authority's future housing supply and delivery targets will be kept under review. For such brownfield sites, the policy position of the Council may need to be much more tailored to their site-specific circumstances and receptive to not only market conditions, but how other complementary actions might help deliver development on these kinds of sites in the future.

4.47 Several brownfield sites have either been appraised in the previous study or have been subject to independent development viability appraisals in the past four years. The fact these sites remain derelict and undeveloped is testament to their predicament, namely they are:

- Adversely affected by specific, yet major, site constraints.
- Located in relatively low value areas.
- Adversely affected by externalities which if they are to pass normal viability tests will require a more mutual and concerted strategy if they are to be built out in the future.

4.48 In summary, the study appraisals reveal that despite changes in the overall market conditions relating to changes in house prices and increases in build costs, on balance these changes have not materially improved the present position of several brownfield sites. As already noted Covid-19 pandemic may give rise to further problems in delivering housing for sale - these problems and issue currently remain unseen. Concerns have been raised nationally with the supply of building materials to deliver new development, particularly for small and medium sized builders, but many major housebuilders are shielded from supply chain issues. The impacts of the stamp duty "holiday" have yet to be understood, but greater clarity will emerge when the subsidies to stamp duty are removed. There are a number of economic factors that could derail a what appears to be a healthy residential market, but currently there are few signs to support a more negative or cautious view of the housing market.

4.49 From this recent study of viability, it is clear that progress is delayed on some planning applications as applicants contest or challenge the viability of the site to deliver affordable housing requirements. The evidence clarifies that all greenfield sites can meet full policy requirements, whilst some of the brownfield sites will not be able to achieve full plan policy compliance given the unique problems and/or situation of the site.

Summary of Overall Root Cause Analysis

4.50 Summary of the new homes position (March 2021):

- There are 85 sites allocated for residential development within the Sites and Policies document; most of these are new allocations but a few are remaining greenfield Unitary Development Plan allocations.
- 400 hectares of land are allocated for residential development with a capacity for 8,500 new homes.
- 7,000 new homes allocated are on greenfield sites.
- Of the 85 allocated sites, 17 sites are estimated to have capacity for around 100 dwellings.

- Around 4,300 homes are in the pipeline for development:
 - Planning permission has been granted for around 3,300 new homes.
 - A further 1,000 new homes are currently pending decision as the issues are worked through in negotiation with the landowner/developer.

4.51 Along with the time required to prepare a new Plan for the Borough within the changing national context of Local Development Frameworks, increasing regional spatial strategy targets (subsequently revoked), the introduction of the National Planning Policy Framework and its accompanying guidance, accompanied by significant reductions in personnel resources for planning services, these factors inevitably contributed to a slow down in the number of sites coming forward and concomitant fall in housing completions, below the anticipated and necessary delivery rate to meet the Housing Delivery Test target per annum. With the adoption of the Local Plan and the allocation of further greenfield sites, attractive to competing private sector developers, it is clear that this position is now improving as a number of planning applications have been submitted and approved. However, this was before the Covid-19 pandemic and it remains to be seen as to the long-term effects and impacts of Covid-19 and also Brexit with the importation of goods and materials and the skills necessary to deliver new dwellings.

4.52 In the coming five years, it will be vital that sites continue to come forward in locations where developers can build without the need for high strategic infrastructure requirements, and in locations where they are saleable. Most of these attractive sites will, therefore, be greenfield sites in locations that are currently achieving higher than median prices. However, some brownfield sites may not enter the development pipeline and thus make an important contribution towards the Local Plan's delivery targets, without intervention by the Council and other public sector agencies such as Homes England.

Key delivery issues

4.53 Prior to the adoption of the Local Plan, the supply of available and suitable housing land was a constraint to development in the Borough. This position has now been rectified and the Council is dealing with increasing numbers of planning applications on allocated housing sites. Policies of the Local Plan seek high quality urban design and promote carbon reduction in the delivery of new development schemes and whilst high density of development is sought, minimising encroachment into countryside, this should not be at the expense of falling or minimal internal space standards, the provision of strong structural landscaping and access to good quality open space. These issues should be at the forefront of decision-making given the Covid-19 pandemic and the requirements for society to ensure access to open space, and the need for families to be able to live, work and educate their children within their personal living accommodation.

4.54 The pace of delivery of Waverley New Community temporarily stalled when the initial draft route for High Speed Rail Link London to Leeds (HS2) was published, showing a route through the Waverley site. The route of HS2 has now been moved further eastwards and no longer impacts on delivery of Waverley. Since this realignment, further planning applications for Waverley have been granted, and build rates have significantly improved. The owners of the site, Harworth's, have undertaken further earth and spoil movement works within the site, beyond the originally estimated time-frames, to enable the creation of appropriate development platforms for further residential,

employment opportunities and creation of the wider landscape setting. As already noted earlier in this chapter, the Council has, during 2020/21, undertaken in-depth research and forensic examination of all site parcel completions at Waverley; commitments remaining; and has estimated likely capacity on site against the number of dwellings permitted (3,890 dwellings).

4.55 Scrutiny of the originally signed S106 Planning Obligation and subsequent variations has also been undertaken. Ongoing discussions with the landowner, Harworth Estates, to more fully understand the services and facilities already provided on site, reveals that the originally permitted 3,890 dwellings cannot be achieved on site, and this has implications for delivery of affordable housing and other community and social infrastructure provision. The Council and Harworth estates are exploring what benefits for the wider public good can be achieved within the wider Waverley hinterland and to explore opportunities for the inclusion of further windfall residential sites arising from forthcoming proposals for the development of the adjacent Highfield Commercial Mixed Use allocation and by the re-structuring of the original outline planning permission to remove a public transport interchange and park and ride facility, and to rely on delivery of one school rather than two schools.

4.56 The Council, in its adopted Core Strategy identified a strategic allocation at Bassingthorpe Farm on the edge of the built area of Rotherham. The Council continues to work closely with the landowners: the council and Fitzwilliam Wentworth Estates, and also Homes England, to seek innovative ways of unlocking development on site.

4.57 Following a recent internal review of delivery options, the Council are also initiating discussions with other public sector partners to explore opportunities for the wider public sector to take a more interventionist role in the initial stages of delivery at Bassingthorpe Farm, either through funding of strategic infrastructure or land acquisition, to bring forward delivery of early phases of development. A more interventionist approach could secure early completion of some homes and be beneficial in supporting the economic recovery post COVID 19.

4.58 A number of allocated brownfield sites within the built-up urban areas have been vacant for a significant number of years, new viability evidence has confirmed this to be the case. They have specific site attributes including abnormal costs of development, potential contamination issues, being located in relatively low market value areas and lacking viability to encourage development of the sites, with developers concerned about the level of reasonable profit based on the level of risks associated with their development. Predominantly these sites are within Council ownership and the Council is seeking to bring them forward using a variety of public and private funding sources.

Challenges

4.59 The challenge will be to ensure that momentum is maintained through the submission of quality planning applications to meet the target housing requirement. Their approval by the planning authority and subsequent delivery by housing developers is a key factor and will require monitoring and reporting.

4.60 Significantly large allocations require greater strategic infrastructure; agreement of S106 planning obligations and phasing of development and appropriate trigger points to ensure the delivery of necessary infrastructure and affordable housing. These conditions are essential to ensure a robust pipeline of saleable properties and affordable housing secured through S106 obligations, alongside supporting services and community facilities. Any changes to phasing and triggers within S106

planning obligations will need to be carefully considered to ensure that the need for strategic infrastructure is appropriately identified and satisfactorily funded by the development scheme or through appropriate grant funding and subsidy. Regular reviews of the delivery of the site and section 106 planning obligation and any triggers will be essential.

4.61 Challenges to satisfying local plan policy requirements of allocated greenfield former green belt sites is a cause for concern within the Local Planning Authority, given the recent adoption of the Rotherham Sites and Policies Document. Viability challenges to local plan policy requirements are becoming more prevalent within the sphere of decision-making, as many housing developers seek to challenge the level of affordable housing (and other S106 Planning Obligation requirements) to be delivered on-site. Development viability challenges inevitably leads to delays in the timeframe for decision-making.

4.62 A substantial lobby of protestor's objecting to development on all greenfield sites at the planning application stage, is also a cause for concern. Given the lack of suitable previously developed land within this Borough, the Local Plan within its evidence base and examination, justified the release of green field land. These protests are leading to delays in decision-making and may lead to refusals and subsequent appeals thus further delaying the delivery of housing completions and meeting the housing test target for this Borough.

4.63 Review and monitoring of the Community Infrastructure Levy collected and the careful determination of its expenditure, alongside S106 planning obligations and other public sector and grant funding, is essential to enable delivery of some of the potentially more constrained sites and those sites/urban extensions which require strategic infrastructure to ensure their delivery in the longer term. A protocol for CIL expenditure and decision-taking is being prepared to ensure the appropriate and timely provision of Strategic Infrastructure and any gaps in funding, matched against other Central Government, local and regional funding priorities.

4.64 The preparation of an Infrastructure Funding Statement by year end supported by a refresh of the Infrastructure Delivery Study, in support of the partial review of the Core Strategy, the preparation of a draft Over-arching SPD on Development Contributions and the focused delivery of strategic infrastructure (following the revocation of Regulation 123 that identified a list of infrastructure projects within the Community Infrastructure Levy), can all aid delivery of new homes in this borough through the identification and provision and infrastructure to unlock potential sites.

4.65 An analysis of Planning Service performance data reveals no significant issues delaying the granting of planning permission, planning applications are generally determined in a timely manner, any extensions to decision-making are agreed with the applicant; and where appropriate the Council and applicant enter into Planning Performance Agreements. However as highlighted above, challenges to the development of greenfield site allocations is becoming an issue of significant concern for newly elected members of Planning Board and may lead to further delays whilst suitable member training is undertaken.

4.66 Rotherham is at the top of the national league table for planning performance. Data collated and analysed on the Council's appeals performance demonstrates that most planning appeal decisions were made in the Council's favour. This demonstrates the soundness of decision making by the Planning Service.

Problems

4.67 Under-delivery of allocated sites and slower delivery on sites below the pace anticipated in determining the five year housing supply, could lead to planning by appeal as the Council may be unable to robustly demonstrate a five year housing land supply. The application of the “tilted balance” by the Planning Inspectorate on appeal, would be a strong possibility. This may also mean development proceeding in unsustainable locations or on land locally valued by communities.

Weaknesses

4.68 The Council has limited control over delivery of private sector residential development on-site. In some circumstances, the Council may be able to encourage, negotiate or promote private sector development by resolving some key strategic infrastructure issues, by assisting in the consolidation of sites in different ownerships, and by the imposition of planning conditions / S106 Planning Obligation to require a regular supply of completions on site.

Summary

4.69 The main reason for Rotherham’s HDT result of 88%, is the low level of housing completions over the last three years; and the under-counting of completions on small sites. The specific issue of under-counting, is to be resolved in the current work programme to prepare the housing land supply monitoring reports for 2019/20 and 2020/21. A further reason for the low number of new home completions, is the time required to prepare a robust Local Plan with a proportionate evidence base, to meet Government requirements. Local Plan preparation for Rotherham required a Borough-wide Green Belt Review to ensure a sufficient supply of sites to meet identified housing need targets. The subsequent time-lag from adoption of the Plan to new housing sites gaining planning permission and building starting on site, has meant that the Central Government target has not yet been achieved. Wider market conditions and developer confidence in achieving their anticipated sales values, are also significant factors.

4.70 The Council will work corporately and collaboratively with other organisations to assist in resolving issues and seeking opportunities to enable development to come forward. The Council will keep sites under review and use compulsory purchase powers where necessary to facilitate development in the public interest. This is a tool of last resort, given the resource constraints of local authority staff and funding resources.

4.71 The Council seeks to remedy shortfalls in housing delivery, through the adoption of its Local Plan and release of a number of greenfield sites it can robustly demonstrate a five year supply of housing land. During the Local Plan examination, landowners, developer’s and their representatives, supported bringing forward their sites for development as soon as possible after adoption of the plan.

5 Project management and monitoring arrangements

5.1 It is proposed that subject to resource availability, a broader programme of structured and focused monitoring is undertaken. This will include:

- Monitoring of new build house price transactions – annually/bi-annually and using Hometrack and ONS datasets and monitoring of locally completed scheme details.
- Monitoring building prices and costs – annually/bi-annually –from BCIS.
- Monitoring of affordable housing delivery via S106 Planning Obligations and other actions undertaken by the council and registered providers to deliver affordable housing.
- Collating results from independent viability appraisals to enable comparisons of up to date information and an understanding of the housing markets in Rotherham.
- Monitoring delivery of house types, mix and sizes - to support the adoption of National Space Standards in the Core Strategy Partial update.
- Regular follow-up surveys of recently completed development schemes focusing on occupier surveys.
- Community Infrastructure Levy (CIL) monitoring and the annual preparation and updating of the Infrastructure Funding Statement.
- Monitoring of S106 planning obligations and inclusion of this information and data into the Infrastructure Funding Statement to determine gaps in funding and delivery of key infrastructure and to consider options for intervention.
- Prepare and agree within the Council a strategic infrastructure delivery protocol and monitoring regime to ensure delivery of key strategic infrastructure.
- Preparation of Supplementary Planning Documents that will support the submission of robust planning applications and assist in the determination of those planning applications.

5.2 It is essential that new monitoring requirements complement other annual monitoring activities regarding the preparation of the Housing Land Supply Position Statement, the Annual Monitoring Report, Brownfield Register and Infrastructure Funding Statement.

5.3 A clear approach and the preparation of an accepted protocol and methodology for undertaking the action plan will enable the Council to ensure it has continuously monitored and reported the baseline position, before deciding what other actions are necessary to improve delivery rates.

Appendix One: Housing developer summit newsletter



Welcome to a special edition of Housing Development News, focussing on our recent Rotherham Housing Developer Summit



The Rotherham Housing Developer Summit has been hailed as an outstanding success as it returned for its fourth year last month.

Hosted by Rotherham Council, the event attracted key stakeholders from across the housing development and construction industry.

Developers, building contractors, architects, investors and estate agents were amongst others at AESSEAL New York Stadium for a showcase of how the Council and its partners are working together to deliver new homes and key projects through innovative programmes throughout the borough.

Delegates heard about how the Council is working with national and regional partners, Sheffield City Region (SCR) and Homes England, and how they can support growth and enable plans to come forward.

The marketplace and exhibition area also showcased land opportunities across the borough which could bring forward 8,300 plus new homes, whilst also providing an excellent opportunity

for delegates to network and generate new business and potential partnerships. Key Council services were also present, including Planning, Procurement and Asset Management.

Dilys Jones, Head of Home Ownership and Supply at Homes England, said: "At Homes England, we're on a mission to accelerate the pace of housebuilding across the country, so it was great to see so much ambition and interest from partners to get more homes built more quickly in Rotherham. Well done to Rotherham Council for a great event, which really showed the sector their commitment to housing growth."



Rotherham Council's Cabinet Member for Housing, Councillor Dominic Beck, said:



"The Rotherham Developer Summit is an exciting event for both the Council and those involved in housing across the region. It's a chance to engage with each other, discover the latest opportunities and find out how to be part of the next wave of transformation in the town.

"Over 200 delegates attended the event and we were delighted to hear that partners are keen to get involved, and be a part of the Council's vision to extend

opportunities and plan for the future of Rotherham."

To find out how to get involved and keep up to date, visit our [enquiry page](#)

Helping to accelerate delivery in Rotherham



This year's key theme was, accelerating delivery of new homes being built in the borough and delegates heard from Tom Hawley, Homes England and Colin Blackburn, Sheffield City Region about how they are helping to accelerate that delivery.

Tom Hawley from Homes England (pictured above right) spoke about their [Strategic Plan](#) which was launched in October 2018 "Homes England is all about making homes happen and our new 5-year plan sets out our ambitious new approach. We are committing to boosting housing

supply, productivity, innovation, quality, skills and modern methods of construction to help make a more diverse and resilient market."

Homes England can support your development in Rotherham by

- Investing in more non S.106 Affordable Housing
- Providing development finance loans to SMEs
- Providing infrastructure loans for large / complex sites

Marketplace and Opportunities



This year's Summit also featured a marketplace and exhibition showcasing a range of housing related public services and early access to Council opportunities.

Thank you to everyone who attended the Summit and subsequently took part in the soft market testing exercise carried out through YORtender. We are currently reviewing the returns which will help inform the routes to market.

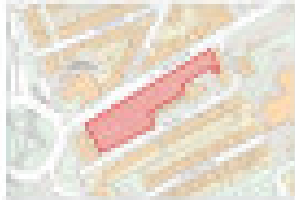
We still welcome your views on the sites and further information is below, if you would like to discuss any of these in more detail please email LandandPropertyTeam@rotherham.gov.uk

Netherfield Court, Eldon Road, Eastwood, S65 1RD



- 1.59 ac / 0.64 ha
- Freehold with vacant possession
- Allocated as residential in the Local Plan
- Site to be cleared
- All delivery proposals considered, including dual delivery with York Road

Land off York Road, Eastwood, B68 1PW



- 1.1T ac / 0.47 ha
- Freehold with vacant possession on output (subject to existing garages)
- Allocated as residential in the Local Plan (H00)
- Site to be cleared
- All delivery proposals considered, including dual delivery with Metherfield Court

Land off Parkin Road, Kimberworth Park, B61 1TL



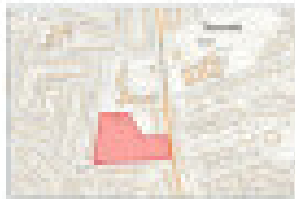
- 6.5 ac / 2.65 ha
- Prime residential development site – H0 in the Local Plan
- Ground Investigation Report (pending further survey work)
- All delivery proposals considered

Land off Marston Street, Cuckfield, B60 2DD



- 2.41 ac / 1.00 ha
- Freehold on area A and long leasehold on area B
- Residential development site
- All delivery proposals considered

Land off Green Afton Road and Ivorhale Road, Thurncroft, B68 6SS



- 4.19 ac / 1.69 ha
- Freehold with vacant possession
- Allocated as residential in the Local Plan (H11)
- Site to be cleared
- Offers will be invited by Internal Tender

Appendix Two: Summary of Strategic Housing Activity

Table 3 Delivery 2019-20:

Scheme	Number of New Homes
Council Direct Delivery	
Bellows Road, Rawmarsh	28
Clusters Canklow	22
Clusters Conway Crescent, East Herringthorpe	14
Clusters Dinnington	5
Clusters Farnworth Road, East Herringthorpe	16
Clusters Northgate, Maltby	65
Community Centre Conversions	10
Council Strategic Acquisitions	
Queens Avenue, Kiveton Park	3
Council Enabled Delivery	
Dalton Allotments (Gleasons)	14
Total	177

Table 4 Delivery 2020-21:

Scheme	Number of New Homes
Council Direct Delivery	
Bellows Road, Rawmarsh	30
Broom Hayes	10
Clusters Canklow	58
Clusters Northgate, Maltby	12

Scheme	Number of New Homes
Council Strategic Acquisitions	
Penny Piece Lane, Aston	6
Council Enabled Delivery	
Dalton Allotments (Gleesons)	36
Lordens Hill, Dinnington (Arches Housing)	15
Westgate Chambers, Rotherham Town centre	10
Total	177

Table 5 Projected Delivery 2021-22:

Scheme	Number of New Homes
Council Direct Delivery	
Broom Hayes	34
SOAHP	14
Town Centre Sites	129
Council Strategic Acquisitions	
Highfield Farm, West Melton	6
Council Enabled Delivery	
Arches Housing Association Small Sites	10
Dalton Allotments (Gleesons)	20
Westgate Chambers, Town Centre	19
Chesterhill Avenue/ Whinney Hill, Thrybergh	TBC
Total	232

References

As per order in this document

Core Strategy adopted September (2014)

<https://www.rotherham.gov.uk/planning-development/guide-local-plan/2?documentId=128&categoryId=20014>

Sites and Policies Development Plan Document (June 2018)

<https://www.rotherham.gov.uk/planning-development/guide-local-plan/3?documentId=128&categoryId=20014>

National Planning Policy Framework February 2019

<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

Strategic Housing Land Supply Assessment 31/03/2017 + Strategic Housing Land Supply Assessment Addendums 31/03/2018 + 31/03/2019

<https://www.rotherham.gov.uk/planning-development/monitoring/6?documentId=268&categoryId=20014>

Annual Monitoring Report December 2020

<https://www.rotherham.gov.uk/planning-development/monitoring?documentId=268&categoryId=20014>

Sheffield City Region Strategic Economic Plan 2015-2025

<https://sheffieldcityregion.org.uk/explore/our-strategic-economic-plan/>

Sheffield City Region Transport Strategy 2018-2040

<https://sheffieldcityregion.org.uk/?s=transport+strategy>

Sheffield Rotherham Strategic Housing Market Assessment

<https://www.rotherham.gov.uk/downloads/download/99/strategic-housing-market-assessment-shma>

Rotherham Council Plan 2019-2020

<https://www.rotherham.gov.uk/downloads/download/83/council-plan>

Rotherham Housing Strategy 2019-2022

<https://www.rotherham.gov.uk/downloads/download/96/rotherham-housing-strategy>

Rotherham Transport Strategy 2016-2026

(Only available from archive)

Rotherham Economic Growth Plan 2015-2025

<https://www.rotherham.gov.uk/downloads/download/79/evidence-base-downloads>

Rotherham Town Centre Supplementary Planning Document (SPD) + Other Adopted Supplementary Planning Documents

<https://www.rotherham.gov.uk/downloads/download/67/planning-guidance>

Rotherham Town Centre Masterplan

<https://www.rotherham.gov.uk/business-economy/rotherham-town-centre-masterplan/1>

Strategic Green Belt Review 2012

<https://www.rotherham.gov.uk/downloads/download/79/evidence-base-downloads>

Detailed Green Belt Review March 2016

<https://www.rotherham.gov.uk/downloads/download/79/evidence-base-downloads>

Community Infrastructure Levy (CIL) introduced 3 July 2017 + Infrastructure Funding Statement December 2020

<https://www.rotherham.gov.uk/downloads/download/50/cil-documents>

Rotherham 2020 Infrastructure Delivery Study - March 2021

<https://www.rotherham.gov.uk/downloads/download/79/evidence-base-downloads>

Affordable Housing Development Appraisal Study July 2019

<https://www.rotherham.gov.uk/downloads/download/79/evidence-base-downloads>

Monitoring of S106 Planning Obligations

<https://www.rotherham.gov.uk/downloads/download/28/section-106-agreement-documents>

Brownfield Land Register December 2020

<https://www.rotherham.gov.uk/downloads/download/55/brownfield-land-register>