



# **Housing Delivery Test Action Plan**

**August 2019**

## Introduction

*This Housing Delivery Test Action Plan was reviewed at Scrutiny Committee on 10 July 2019 and agreed for publication by Cabinet on 23 July 2019. It was published on the Council's website on 1 August 2019.*

According to statistics published by the Ministry of Housing, Communities and Local Government (MHCLG), during the monitoring period 2015-2018 housing delivery in the borough of Broxbourne fell short of the requirement of 1,151 homes by 384 homes (767 homes were delivered)<sup>1</sup>. This represents 67% of the total requirement, and therefore the Borough Council is required to publish an Action Plan to indicate how this shortfall can be remedied and the supply of housing boosted.

The Council submitted its emerging Local Plan to the Secretary of State for examination in March 2018. Alongside this was submitted an extensive evidence base, including an Infrastructure Delivery Plan and a Transport Strategy. The evidence demonstrates that there are no obstacles to delivery which would cast doubt on the development framework set out in the Local Plan. A spreadsheet based on a standard format advised by the Planning Advisory Service has been prepared for each of the Local Plan sites to indicate progress is published alongside this Action Plan. A summary of this analysis, together with the basis of the approach to the broad strategy to boost housing supply in the emerging Local Plan is set out below.

Given the stage of the Local Plan at examination, and having recently passed through two stages of public consultation, it is not considered necessary to consult on the Action Plan, which essentially forms a statement of the Council's current position.

### **A) Optimising the use of urban brownfield sites where appropriate and deliverable**

Two Calls for Sites were undertaken in 2016 and 2017 and this resulted in a number of brownfield sites being promoted for development. A workshop was held with Members to identify other sites which could come forward. Alongside the landowner-promoted sites, the Council also proactively considered the potential of a number of other sites and approached the landowners where necessary. Examples of this include the disused Gas Distribution station to the rear of Broxbourne Station, which features as a site allocation in a modification to the emerging Local Plan. The Council has also worked with other site promoters such as Hertfordshire Constabulary to allocate the disused Hoddesdon Police Station site.

Within the emerging Local Plan the largest site allocation by number of new homes is known as 'Cheshunt Lakeside' and comprises the site of the large site vacated by Tesco's in 2015 and the surrounding employment land. The emerging Local Plan sets out a comprehensive-mixed use development scheme including approximately 1,750 dwellings and 20,000 square metres employment floorspace, to secure environmental enhancements to the locality and maximise the benefits of the location adjacent to Cheshunt Station. The Council has worked closely with the developers Cheshunt Lakeside Ltd to secure a high-quality, deliverable scheme, and ensure that a relocations strategy is in place for remaining businesses on the site. A realistic phasing schedule has been agreed.

The Local Plan identifies a further brownfield regeneration opportunity at Waltham Cross Northern High Street. This scheme will take advantage of opportunities outlined by the potential of two major 'big box' retailers to vacate the premises. The Council has worked with the landowners to plan for a deliverable scheme. It is anticipated that at least 300 dwellings can be delivered within the area demarcated on this site. A relatively small parcel of the land

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<sup>1</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement> (19 February 2019)

within this area has been promoted as a stand-alone development but to date the proposals received would compromise the ability of adjacent land to come forward. Therefore to date these proposals have been resisted on the grounds of failure to achieve the comprehensive approach required by the draft policy.

Through the Call for Sites and subsequently there has been pressure to release part of the employment area at Plumpton Road for housing. Designated employment areas play an important role in providing for small and medium-sized businesses including workshops and therefore residential redevelopment has been resisted. Given the proposed re-designation of employment land at Delamare Road the protection of the remainder of the borough's employment areas is important in order to ensure an adequate supply of local jobs.

Park Plaza North is the only significant vacant/disused opportunity brownfield site in the borough which has not been allocated for housing. The Park Plaza Development Options study (April 2016) concluded that the proximity of the site to Junction 25 of the M25 renders the site appropriate for commercial uses rather than residential, as part of a wider employment cluster. Residential development in this area would be inappropriate because of the severance from Waltham Cross town centre caused by the proposed closure of the level crossing at Park Lane, the difficulty of providing educational capacity at a site this size and location, and the lost opportunity to create a critical mass of employment at the gateway to the borough. The site has recently been bought for commercial development and the Council is in ongoing discussions with the new landowner.

## **B) Selective release of Green Belt**

It was established early on that release of some land from the Green Belt, which covers 65% of the borough, would be necessary if housing requirements are to be achieved. This was confirmed by a thorough assessment of the capacity of sites within the urban area as part of the process of formulating the Local Plan<sup>2</sup>. The Council used the evidence of the existing comprehensive Green Belt Review and considered the case for release of sites from the Green Belt in a Topic Paper which forms part of the Local Plan evidence library<sup>3</sup>. This was based on criteria covering all the dimensions of sustainable development. Alongside the consideration of Green Belt sites, masterplanning was used to inform calculation of site capacity.

The following summarises the position on each of these sites.

*Brookfield Garden Village* is allocated for 1,250 homes on land owned primarily by Broxbourne Council and Hertfordshire County Council. It is anticipated that a planning application will be submitted once the Local Plan inspector's final report is received.

*Brookfield Riverside* is allocated for a mixed-use development as part of a future town centre. It is not anticipated that any of these homes will be delivered in the first five years. The Council awaits the final report of the Local Plan inspector with regards the policy for this site.

*Rosedale Park* is allocated for 820 homes and a primary school, plus a care home. The Council resolved to grant permission in 2018 subject to signing of a Section 106 agreement. The Council is working with the developers to resolve outstanding matters.

*High Leigh Garden Village* was granted permission in 2014 and after a significant delay the essential highways and utility works are nearly complete. It is anticipated that housing delivery will commence during 2019/20.

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<sup>2</sup> Strategic Housing Land Availability Assessment, 2017 [www.broxbourne.gov.uk/slaa](http://www.broxbourne.gov.uk/slaa)

<sup>3</sup> Green Belt Topic Paper, June 2017 [www.broxbourne.gov.uk/evidencelibrary](http://www.broxbourne.gov.uk/evidencelibrary) (document GB1)

A number of sites in *Goffs Oak and Bury Green* in the range 25-100 dwellings have been allocated in the Local Plan. These have been chosen in part for their relationship to the existing urban area. Planning applications have already been received for a number of these sites and it is anticipated that permissions will be granted in accordance with appropriate phasing once the Local Plan has been adopted. There are a number of other sites in Green Belt where very special circumstances have been established to allow development, where housing construction has been underway during 2018/19. These include Britannia Nurseries at Waltham Cross and the former St Mary's High School site, Bury Green.

A comprehensive assessment of the Green Belt was undertaken during the formulation of the Local Plan. This assessment concluded that the exceptional circumstances did not exist to release Green Belt in other areas of the borough<sup>4</sup>. For the large part the remainder of the Green Belt is open countryside and any substantial new development would not relate well to the urban area and would not contribute to achieving sustainable patterns of development. Following hearings on housing and Green Belt, the Local Plan inspector has concluded that *"there are exceptional circumstances to justify removing land from the Green Belt in the locations proposed in the Plan."*<sup>5</sup> It is therefore anticipated that the removal of these sites from the Green Belt will make a significant contribution towards bridging the identified gap with the housing requirement.

### **C) Derelict Glasshouse sites in the Green Belt**

The borough once hosted a large number of glasshouses linked to the horticultural industry associated with the Lee Valley. The majority of these have long since disappeared and been replaced by other employment uses or for residential development. The remaining glasshouses are located in the Green Belt and redevelopment of these site at standard residential densities would cause harm to the purposes of Green Belt, including the openness of the countryside. The emerging Local Plan contains a draft policy which seeks to achieve the remediation of derelict glasshouse sites through redevelopment for self-build and custom-build housing at a density and form of development compatible with their Green Belt location. Therefore a modest scale of development is allowed in the housing trajectory. The Council is undertaking a pilot project around delivery of this type of approach at a site in Bury Green. The Local Plan inspector's views on this approach are anticipated in his final report later this summer.

### **D) Windfall**

The Council undertook an assessment of windfall which was further supplemented following discussion at the Local Plan hearings during September 2018. Based on this work, a realistic trend-based approach suggests that a figure of 70 dwellings per annum is achievable<sup>6</sup>.

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<sup>4</sup> See the Development Options reports (April 2016), the Borough-Wide Options and Scenarios (April 2016) and the Green Belt Topic Paper (June 2017).

<sup>5</sup> Post-hearings Advice Note, 10 December 2018

<sup>6</sup> Council Response to Week 1 Action Point 4 (document EXAM14D)

[www.broxbourne.gov.uk/localplanexamination](http://www.broxbourne.gov.uk/localplanexamination)

## **Conclusion**

The following conclusions may be drawn from the above summary:

1. With the expected final report from the inspector anticipated during October 2019 at the end of a lengthy process of plan formulation including extensive consultation, the Local Plan demonstrates a full and evidenced programme of housing delivery which has been independently examined;
2. Difficult choices have been made in respect of Green Belt and the alternatives have been properly considered; and
3. The housing strategy forms part of the wider strategy for sustainable development and should not be divorced from the wider vision and objectives for the borough.

The Council therefore has a clear way forward to boost housing delivery and achieve requirements.