



**BOROUGH OF
BROXBOURNE**

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Housing Delivery Action Plan

November 2022

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1. Introduction

In 2018, a revision of the National Planning Policy Framework (NPPF) introduced the Housing Delivery Test (HDT). The HDT measures net housing delivery, or the completion of new homes, within a local planning authority area, against the housing requirement figure as adopted in the Local Plan. A local authority is required to:

- publish an action plan if housing delivery falls below 95% of the housing requirement figure over the previous three years,
- apply a 20% buffer to the local planning authority's five-year housing land supply, if housing delivery falls below 85% of the housing requirement; and
- the 'presumption in favour of sustainable development' will apply to local planning authorities where housing delivery falls below 75%. The presumption in favour of sustainable development puts pressure on Councils to approve development which would otherwise be considered inappropriate (i.e. development which conflicts with policies in the Council's adopted planning documents)

The Ministry of Housing, Communities and Local Government (MHCLG) published its HDT measurements for 2021 in January 2022. The results are outlined in Table 1 below:

Table 1: Borough of Broxbourne [Housing Delivery Test measurement 2021](#)

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2021 measurement
2018-2019	2019-2020	2020-2021	1,172	2018-2019	2019-2020	2020-2021	844	72%
454	416	302		492	150	202		

Table 1 indicates that the Borough of Broxbourne delivered 72% of its housing requirement in the previous three years. Therefore an action plan is required to be published and the presumption in favour of sustainable development applies. This action plan has been prepared, in line with National Planning Practice Guidance, and aims to:

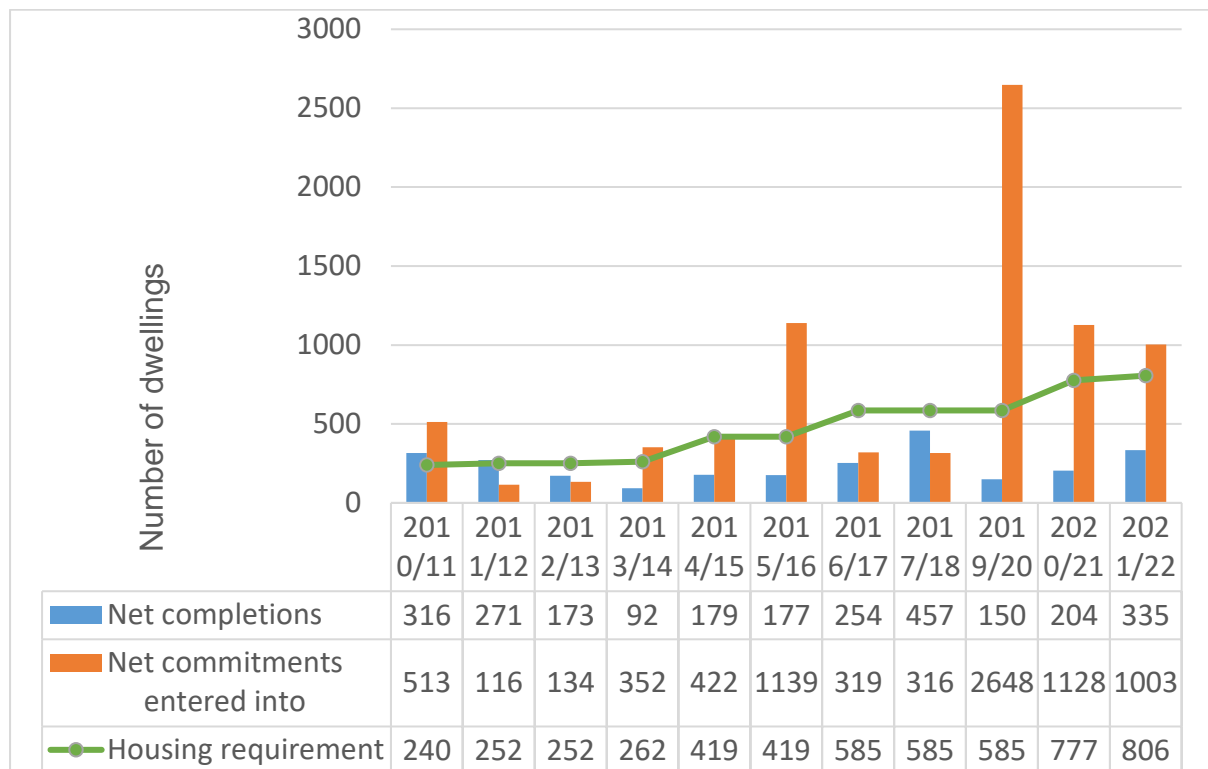
- identifying the causes of under-delivery,
- exploring ways to reduce the risk of future under-delivery; and
- set out measures to improve levels of delivery.

The latest five-year housing land supply position is addressed within the Authority Monitoring Report (AMR), available on the Council's website at <https://www.broxbourne.gov.uk/amr>.

The Broxbourne Local Plan 2018-2033 was adopted in June 2020. The Plan sets out a comprehensive growth strategy for the borough including allocating sufficient land to achieve more than 8,000 new dwellings over the period 2016-2033.

As the allocated sites in the previous Local Plan were built out, the borough relied on windfall development to meet its housing targets. Moreover housing delivery in the borough has been consistently falling short of its housing requirement since 2011/12 as demonstrated in Table 2 below. This clearly illustrates the importance of a plan led approach to development and it is anticipated that new housing delivery will increase substantially in the years to come now that an up-to date plan is in place.

Table 2: Commitments, completions and housing requirement 2010-2022



Source: Broxbourne Borough Council Authority Monitoring report 2021-2022

2. Causes for under delivery

Since the adoption of the Local Plan, a healthy supply of major sites are in advanced stages of planning and implementation. Between 1st April 2021 and 31st of March 2022 a total of 1,003 dwellings were approved planning permission. It is anticipated that delivery will accelerate, and that Broxbourne is well placed to deliver on its Local Plan housing trajectory. However, although the adoption of a new local plan represented an important step towards meeting housing requirements there has been a lag between the adoption of the plan and the actual delivery of housing allocated within it. A number of factors have contributed to this issue and are outlined below.

The plan's adoption saw a significant uplift in the borough's housing requirement from approximately 250 until 2014/2015, which then increased to 419, and latterly to 716 with the new Local Plan and national policy requirements to add a 20% buffer and address historic shortfalls in delivery. In order to facilitate the delivery of these dwellings 490 hectares (14.7%) of Green Belt land was released for development. This has led to a significant increase in the volume of major planning applications submitted to the Council and represents a significant increase in the workload of its very small development management service, particularly for senior, experienced staff. Moreover, development within the Borough of Broxbourne has been affected by the combined effects of Brexit, the Covid-19 Pandemic and the recent outbreak of war in Ukraine. These factors have affected international trade and the availability and cost of building materials, particularly concrete, bricks, block and timber. Transport related costs have also risen due to fuel prices and an insufficient supply of HGV drivers nationally. Similarly, a shortage in skilled labourers has further impacted the build out rates of many developments.

It is also important to note that lengthy delays have been caused by developers and landowners changing their minds on whether to implement an approved planning permission. Landowners and developers may wish to change the approved planning application, for example to increase the number of units on their site.

Similarly, a change in ownership on sites, which hold approved planning permissions, can cause significant delays. It is not uncommon for planning applications to be approved on sites in multiple ownership. Negotiations amongst landowners and developers can be contentious and therefore lengthy. Some landowners choose to sell on their sites with approved planning permissions in order to increase the value of the site.

Finally, the design quality of planning applications received by the Council has been highly variable. A significant number of applications have required a considerable amount of officers time, to negotiate and encourage developers to achieve satisfactory design before schemes can be presented to Planning Committee with a positive Officer recommendation. Broxbourne Council is committed to securing high quality design and place-making, in line with both local and national policy and guidance, through the planning system. The Council's planning service is not prepared to accept poor quality proposals in order to achieve housing requirements.

3. Actions

The Council is committed to taking action to increase housing delivery in the borough. **Appendix A** sets out actions for each of the Local Plan sites where necessary and appropriate. General actions are outlined below.

Update brownfield register

In order to encourage housebuilding within the existing urban areas of the borough the brownfield register will be updated. This will help to identify smaller development sites accessible to small and medium sized developers. The Council is currently holding a Call for Sites in Waltham Cross as the first stage in this process.

Human Resources

The Council has employed several new staff members within the Planning department over the last year and will continue employ additional permanent and temporary staff, within existing budgets.

Council built housing

Broxbourne Council's property development company, Badger Investments Ltd, currently has a number of schemes on Council-owned land in the pipeline following the successful delivery of 24 apartments at Wolsey Court, Cheshunt, in 2020.

4. Conclusions

There is an inevitable lag between the adoption of the Local Plan and actual delivery of housing, as the planning stages of the development process take time to resolve often complex issues. It is to be expected that the significant numbers of permissions issued during 2021/2022 will feed through into completions on the ground over the next 2-3 years.

Broxbourne Council agrees with the government's emphasis on securing high quality design and placemaking through the planning system. The Council will continue to work with applicants to ensure that at the point at which applications are recommended for approval they achieve a satisfactory quality in relation to the requirements of both national and local policy and guidance. Broxbourne Council's planning service is not prepared to waive design and placemaking requirements in pursuit of the rapid delivery of poor quality housing.

Appendix A: Progression at Local Plan Housing Sites

Site Name	Location	Policy	Local Plan indicative figure	Progress Update August 2022
Brookfield Riverside	Turnford	BR1	250	07/22/0989/O registered in October 2022. Construction anticipated to start in 2024 with estimated completion in 2026
Brookfield Garden Village	Turnford	BR2	1250	07/22/1079/O registered in November 2022. Construction anticipated to start 2024 at a rate of 150 dwellings per annum with completion expected in 2032
Gas Distribution Station	Broxbourne	BR3	35	No applications submitted to date, applications expected by 2024/25. Action: the Council will work with the landowner to provide a suitable masterplan-led approach to the site.
Broxbourne School	Broxbourne	BR4	153	Expected 2029/30 Reserved application for residential aspect (07/19/0368/RM) approved 07/2019. 41 dwellings were completed during this monitoring period
Cheshunt Lakeside	Cheshunt	CH1	1750	07/18/0461/O – Developer estimates of build out rates Parcel 13, 95 dwellings, start date: Feb-23, delivery date: Jan-25 (07/22/0597/F) Parcel 12, 279 dwellings, start date: Jun-23, delivery date: Jan-26 (07/22/0597/F) Parcel 10a/10b, 137 dwellings, start date: July-26, delivery date: May-29 Parcel 3, 184 dwellings, start date: Mar-26, delivery date: Feb-28 Parcel 4, 118 dwellings, start date: Jun-25, delivery date: May-27 Parcel 9, 125 dwellings, start date: Jul-24, delivery date: Oct-26" Parcel 11, 195 dwellings, start date: Nov-20, delivery date: July 22 & Jan-23 (07/19/0996/RM) Parcel 14, 22 dwellings, start date: July-21, delivery date: Nov-22

Site Name	Location	Policy	Local Plan indicative figure	Progress Update August 2022
				<p>(07/20/1186/RM) Parcel 2, 205 dwellings, start date: Aug-21, delivery date: Nov-23 (07/20/1187/RM) Action: the Council is working with the northern landowners to progress a masterplan-led approach to the remainder of the site.</p>
Rosedale Park – North/South of Andrew’s Lane and South of Peakes Way	Cheshunt	CH2	464	<p>Construction commenced 08/2022 (07/17/0352/O) Developer estimates of build out rates below: Phase 1a, 50 dwellings, completions: January – September 2023, (07/21/0596/RM) Phase 1b, 29 dwellings, completions: 2023 / 2024, Phase 2, 145 dwellings, completions: 2024 – 2026, Phase 3, 82 dwellings, completions: 2025 / 2026, Phase 4, 62 dwellings, completions: 2026 / 2027, Phase 5, 12 dwellings, completions: 2028 Action: the Council will work with the developers to progress applications for the remainder of the site in accordance with a masterplan-led approach.</p>
Rosedale Park – Tudor Nurseries	Cheshunt	CH2	360	<p>Estimated delivery dates below (07/20/0157/RM) Oct 2021 – June 2022: 42 units completed July 2022 – June 2023: 50 units + shell and core retail unit July 2023 – June 2024: 60 units July 2024 – June 2025: 70 units July 2025 – June 2026: 70 units July 2026 – June 2027: 68 units</p>
Rosedale Park – South of Andrews Lane	Cheshunt	CH2	60	<p>Full planning permission received in 12/21 (07/21/0005/F) 43 of the 66 dwellings have started construction.</p>

Site Name	Location	Policy	Local Plan indicative figure	Progress Update August 2022
Cheshunt Football Club	Cheshunt	CH7	165	Cheshunt FC new stadium application (07/18/0514/F) was refused on 23/11/2020. A public enquiry was held between 27/07– 04/08 2021. The application was allowed on the 13/09/2021.
Theobald's Brook Field	Cheshunt	CH9	90	The site is working towards delivery in 2024/25. An Outline application (07/18/0021/O) received on 03/01/2018 and is currently under consideration. Action: the planning team will liaise with the property team to seek early resolution of outstanding matters.
East of Dark Lane	Cheshunt	CH10	50	Reserved matter application was approved 04/22 (07/21/1176/RM). With construction due to start early 2023 with anticipated completion during 2024. Action: Council to seek early determination of reserved matters, subject to finalisation of a satisfactory scheme.
Former Eastern Playing Fields	Cheshunt	CH11	75	Hertfordshire County Council stated that it is anticipated that this 75-bed extra care facility will be completed by autumn/winter 2024. Action: working with the applicant through pre-application process to minimise delays.
North of Bonney Grove	Cheshunt	CH12	0	Application for 40 dwellings expected (excluding V&E club) 2 years after adoption of Local Plan unless relocation site is found in which case a comprehensive development is expected. See policy explanation.
Council Offices, Churchgate	Cheshunt	CH13	75	Full planning permission received in 06/22 with construction planned start 11/22 with estimated completion in early 2025
South of Hammondstreet Road	Cheshunt	CH14	45	No applications submitted to date. An application could be expected by 2024/25 . Action: the Council will continue to persuade the landowner to develop the site in accordance with the Local Plan policy.
North of Goffs Lane	Goffs Oak	GO2	80	Approved at committee on 06/22 (07/21/1277/F). With an anticipated start date 2023 and expected completion by 2026

Site Name	Location	Policy	Local Plan indicative figure	Progress Update August 2022
				Action: the Council will continue to work with the landowners to resolve this issue
South of Goffs Lane	Goffs Oak	GO3	50	Received planning permission 04/2021 (07/19/0835/F) Construction has commenced with expected completion 2023
Newgatestreet Road	Goffs Oak	GO4	25	Received planning permission in 08/2021 with 3 plots completed and 14 plots under construction.
North of Cuffley Hill	Goffs Oak	GO5	45	Received planning permission 07/2019 (07/18/0363/F) construction almost completed with 19 of the 23 approved dwellings completed in the monitoring period
19 Amwell Street and Scania House	Hoddesdon	HOD2	60	Application (07/19/0204/PNRES) approved on 30/04/2019 Action: the Council will work with B3 Living to understand and progress their plans for the remainder of the site.
Turnford Surfacing Site	Hoddesdon	HOD4	40	Granted permission at planning and regulatory committee 12/2020 (07/20/0467/F)
Former Hoddesdon Police station	Hoddesdon	HOD3	30	Planning application received 03/22 (07/22/0252/O) for 39 residential flats and 4 residential units
East of Dinant Link Road	Hoddesdon	HOD6	35	Link Road completion expected spring 2021. The Council expects delivery in 2025

Site Name	Location	Policy	Local Plan indicative figure	Progress Update August 2022
High Leigh Garden Village	Hoddesdon	HOD7	485	Outline application (07/13/0899/O) approved for 485 new dwellings and a 60-bed care home on 02/04/2015. Application for primary school (07/19/0102/CM) granted by Hertfordshire County Council. Phase 1: 100 homes (07/20/0046/RM) 72 plots completed with the remaining 28 under construction (Finish 11/2022). Phase 2: 141 homes (Dec-22 - June 24) – (07/21/0405/RM) 95 of the 141 plots under construction Phase 3: 110 homes (May 24 - Aug 25) - (07/22/0544/F) currently under consideration) (87 pro-rata for 12 months to end March 2025). Phase 4: 54 homes (07/22/0504/F currently under consideration).
Westfield Primary School	Hoddesdon	HOD8	40	Application (07/19/0011/O) approved for 40 dwellings on 12/03/2019 Relocation and expansion of primary school to High Leigh anticipated to be complete for Sept 2024. Construction will begin onsite in the summer of 2024 with aims of completing 2026/27
Waltham Cross Northern High Street	Waltham Cross	WC2	150	Master planning work underway. Council has acquired part of the High Street site. Application approved at committee 05/22 (07/21/1260/O) for 40 dwellings
Theobalds Grove Station Car Park	Waltham Cross	WC3	50	Application expected 2024/25. Discussions ongoing with landowner regarding masterplanning. Action: Council will advise Network Rail of the need to demonstrate the acceptability of higher levels of development through design and masterplanning.
Former Britannia Nurseries site	Waltham Cross	LV6	90	Application (07/16/1354/RM) fully completed during 2019/20.
			TOTAL: 6002	