

Tameside Council

Housing Delivery Test - Action Plan

July 2022



Prepared by:

Planning Policy

Tameside Metropolitan Borough Council

PO Box 304

Ashton-under-Lyne

Tameside

OL6 0GA

Main contributors

Simon Pateman

Laura Smith

Checked & Issued By

Graham Holland – Planning Policy Team Manager

Approved By

Cllr Jan Jackson – Executive Member for Housing, Planning and Employment

Nick Fenwick – Interim Director of Place

Status

4.0 Final Publication Version

Copyright

Ordnance Survey mapping produced under licence; Crown copyright and database rights 2022 Ordnance Survey 100022697

Document Management

No.	Details	Date
1.0	Working Draft	03.05.2022
2.0	Working Draft	23.05.2022
3.0	Final Draft	28.06.2022
4.0	Final Publication Version	20.07.2022

Executive Summary

Tameside’s Housing Delivery Test Action Plan 2022 provides an overview and analysis of housing delivery within the borough for the three year period 2018/19 to 2020/2021. Fundamental to the success of this document are the actions and responses it contains for the council to either implement or improve on.

The anticipated outcome of these actions will improve the council’s development management process whilst contributing to an accelerated rate of housing delivery. These actions will assist by increasing developer confidence to undertake development in the borough.

A collaborative approach within the council has led to the actions set out in this document and it provides the basis for exploring specific developer engagement over the 12-month period following publication. This will help to provide a greater understanding of the issues affecting development within Tameside.

Contents

1.0	Introduction.....	1
	Background.....	1
	2021 Housing Delivery Test - Results.....	3
	Purpose, objective and status	4
	Other plans, strategies and initiatives	5
	Approach and Methodology	9
	Covid 19 Pandemic.....	9
2.0	Housing Delivery	10
	Planning Context.....	10
	Housing Supply and Delivery - Analysis	11
	Other Issues.....	16
	Stalled Sites and Empty Properties.....	16
	Lichfields – Start to Finish (Second Edition) 2020.....	17
	Letwin Review (2018)	18
	Root Cause Analysis.....	18
3.0	Key Actions and Responses.....	21
4.0	Project Management and Monitoring.....	33
	Project Management.....	33
	Monitoring	33
	Appendix 1 – MHCLG HDT Measurement January 2021.....	34

1.0 Introduction

Background

- 1.1 As part of a programme to significantly boost the supply of new homes nationally the Government have introduced a number of measures and reforms to the planning system intended to deliver more homes, improve affordability and remove barriers to development. As part of these reforms local planning authorities (LPAs), such as Tameside, have been challenged to be more proactive by increasing the quantity and variety of their housing land supply and rate of delivery in order to meet the identified housing needs of their local area.
- 1.2 Tameside Council recognises the challenges posed by increasing the supply and accelerating the delivery of new homes. Tameside is one of nine Greater Manchester councils that have worked to prepare a joint Development Plan Document, Places for Everyone (PfE). Once adopted PfE will set an annual housing target for each of the nine councils involved in its preparation.
- 1.3 The Housing Delivery Test (HDT) was introduced by the Government in November 2018 as a monitoring tool to assess whether a sufficient supply of homes are being identified to meet local housing need on an annual basis. The HDT is a percentage measurement of the number of net new homes delivered against the number of net homes required over a rolling three year period¹.
- 1.4 Paragraph 76 of the National Planning Policy Framework (NPPF) states that ‘where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years’.

¹ MHCLG, July 2018: Housing Delivery Test Measurement Rule Book, paragraph 5

1.5 For those LPAs that have fallen short of their housing delivery requirement certain policies in the NPPF will apply, in addition to the publication of an action plan, including²:

- A 20% buffer on the local planning authority’s 5 year land supply if housing delivery falls below 85%³;
- The application of the presumption in favour of sustainable development if housing delivery falls below 75%⁴, and
- Subject to the transitional arrangements set out in paragraph 222 of the NPPF.

1.6 In circumstances where an LPA, such as Tameside, does not have an up to date housing target, the government requires that the authority’s 5 year housing land supply be measured against the areas local housing need calculated using the standard method set out in national planning guidance⁵. Table 1 below sets out Tameside’s housing requirement using the government’s standard methodology and the 2014 household projections:

Table 1: Housing Delivery Test – The Requirement

Period Covered	Household Projection	Housing Requirement
2018-2019	2014-based	632
2019-2020	2014-based	588
2020-2021	2014-based	433 ⁶

² MHCLG, July 2018: Planning Practise Guidance, Housing supply and delivery, paragraph 042 Reference ID: 68-042-20190722.

³ MHCLG, July 2021: National Planning Policy Framework, Paragraph 74, footnote 41.

⁴ MHCLG, July 2021: National Planning Policy Framework, Paragraph 11, Footnote 8.

⁵ MHCLG, July 2021: National Planning Policy Framework, Paragraph 74, footnote 39

⁶ In order to reflect the national disruption caused to housing delivery by the pandemic to starts and completions, construction, and monitoring of completions, the period for measuring the ‘homes required’ in 2020/21 has been reduced by 4 months and in 2019/20 by 1-month.

Period Covered	Household Projection	Housing Requirement
Total		1,653

2021 Housing Delivery Test - Results

- 1.7 The HDT 2021 Measurement covers the three year period 2018/19 to 2020/21 and was published by MHCLG on the 14 January 2022. An extract covering the measurement for Tameside is included at Appendix 1. The full spreadsheet showing the results for England is on the GOV.UK website⁷.
- 1.8 The HDT gives a total net requirement of 1,653 homes in Tameside for the three period 1 April 2018 – 31 March 2021. Over the same period 1,510 net additional homes, or 91% of the total HDT requirement, were delivered within the borough⁸. This is a positive increase in delivery from 2018 (66%), 2019 (75%) and 2020 (89%).
- 1.9 As Tameside’s HDT result shows that delivery of housing has fallen below 95% of its requirement the council needs to prepare this Housing Delivery Test - Action Plan (from here on referred to as the ‘Action Plan’). However, as delivery is not below 85% the council does not have to automatically implement a 20% buffer on the five year housing land supply in line with paragraph 73 of the NPPF.
- 1.10 For those areas which fail to deliver 75% of their total housing requirement, the HDT also calls for the application of the presumption in favour of sustainable development as set out in the NPPF at paragraph 11. The application of the presumption in this scenario would mean granting permission unless a specific set of criteria outlined in the Framework are

⁷ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

⁸ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>, paragraph 8 states that the national statistic for net additional dwellings is sourced from the Housing Flow Reconciliation form.

relevant. This is being phased in via transitional arrangements over a period of three years. The transitional thresholds set out in the NPPF⁹ are as follows:

- 2016/17 to 2018/19 - delivery below 45%
- 2017/18 to 2019/20 – delivery below 75%
- Subsequent years – delivery below 75%

1.11 As Tameside has delivered 91% of its 2021 requirement the council is not automatically required as a result of the test measurement to apply a presumption in favour of sustainable development as set out within paragraph 11d of the NPPF.

Purpose, objective and status

1.12 The Action Plan provides analysis of the key reasons for under-delivery against the requirement and identifies the measures the council both has and intends to implement in order to improve the delivery of homes in Tameside.

1.13 Delivering housing growth is complex and whilst a number of actions can be pursued by the council, the support and co-operation of landowners and developers involved in housing delivery will be essential. This approach of engaging with stakeholders will enable the Action Plan to successfully respond to the challenges of increasing and maintaining the delivery of homes in the borough.

1.14 The Action Plan is intended to raise the importance of housing delivery and the role the council can take in meeting the current housing need by promoting the delivery of new homes across the borough.

⁹ MHCLG, July 2021: National Planning Policy Framework, Annex 1 Implementation, Paragraph 222

Other plans, strategies and initiatives

1.15 The Action Plan will complement a range of existing and proposed council and Greater Manchester Combined Authority plans that provide a framework for the delivery of the district's housing priorities. These include the following:

Greater Manchester Housing Strategy 2019-2024¹⁰ - lays out an ambitious plan to deliver housing across Greater Manchester. The development of the Greater Manchester Housing Strategy has been defined by a 'different approach', marked by co-production, agreement and collaboration between a diverse array of stakeholders. A key part of this approach was the 2018 Listening Sessions, held in each of the ten local authorities. A Housing Vision¹¹ document was launched as the foundation of the strategy in January 2019. The content is wide ranging with an emphasis on unlocking practical advantages through closer collaboration and consistency across the city-region. This includes an approach to design standards for new builds; the balance of enforcement and support for private landlords; and definitions of 'affordability'.

Greater Manchester Housing Strategy Implementation Plan – December 2019¹² - has been developed in order to steer and track the progress of the Greater Manchester Housing Strategy and focuses on actions, interventions and analysis at the Greater Manchester level. The implementation plan divides actions and interventions into strategic priorities including, for example: improving access to social housing, new modes of housing delivery and increasing choices in the housing market for GM households.

Greater Manchester Strategic Housing Market Assessment, January 2019¹³- provides evidence of Greater Manchester's housing market and how it

¹⁰ <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/housing-strategy/>

¹¹ [5_gmca_gm_housing_vision_110119_merged.pdf \(gmconsult.org\)](https://www.greatermanchester-ca.gov.uk/media/110119/gm-housing-vision-110119-merged.pdf)

¹² <https://www.greatermanchester-ca.gov.uk/media/2653/gm-housing-strategy.pdf>

¹³ <https://www.greatermanchester-ca.gov.uk/media/1733/gm-shma-jan-19.pdf>

is changing, an assessment of future needs for market and affordable housing and explores the housing needs of different groups within the population over the next 20 years.

Places for Everyone Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan.

Submission Plan 2022¹⁴ - aims to improve employment opportunities, build the right homes in the right places, rejuvenate green spaces and reshape town centres and for new development to be sustainably integrated into Greater Manchester’s transport network or joined by new infrastructure. PfE has now been submitted to the Secretary of State, who has appointed planning inspectors to conduct an examination in public of the plan. Importantly, once adopted, the Plan will set the annual housing target and other strategic plan policies relating to the delivery of new homes for Tameside and the eight other districts up to 2037.

Tameside Corporate Plan ‘Our People – Our Place – Our Plan’ 2019¹⁵ - identifies within its key priorities the delivery of modern infrastructure and a sustainable environment that works for all and future generations. This encompasses two housing related actions: increase the number of net additional dwellings; and increase the number of affordable homes.

The Tameside Strategic Asset Management Plan (SAMP) 2020¹⁶ – aims to ensure that Council and CCG land and property assets contribute pro-actively to the organisations’ priorities. The plan acknowledges the value of land and property assets in delivering the priorities in the Tameside Corporate Plan and Greater Manchester 5 Year Environment Plan¹⁷. The plan expects to be able to provide sites and developments that deliver inclusive economic growth, housing growth, employment growth, regeneration and connectivity through a

¹⁴ <https://www.greatermanchester-ca.gov.uk/media/4838/places-for-everyone.pdf>

¹⁵ <https://www.tameside.gov.uk/corporateplan>

¹⁶ Item 6b:

<https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=134&MIId=5049&Ver=4>

¹⁷ [Five-Year Environment Plan - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](#)

comprehensive property review and ongoing review of the asset base. The plan sets out the actions to achieve this including the proactive release of public sector sites for development, development of council-owned sites, targeting development to stimulate the market/address market failure, strategic acquisition of sites for development/transport schemes, and the protection, enhancement and reutilisation of heritage/cultural assets.

The Tameside Housing Strategy 2021-2026 - sets out Tameside's commitment to accelerate the delivery of new homes to support economic growth and widen housing choices and options and deliver affordable, good quality housing in safe, clean and quality neighbourhoods. The Tameside Housing Strategy sets out the borough's vision for the next 10-20 years to meet the targets and objectives set out in the Greater Manchester Housing Strategy and the emerging PfE Joint Development Plan. It is also anticipated that the Tameside Strategy will be followed by a more detailed Housing Delivery Implementation Plan which will act as a companion piece to this strategy outlining a range of actions required to achieve the six priorities for action set out in the Strategy comprise:

- Priority 1 – Delivering sustainable housing growth to support economic development and the increasing population.
- Priority 2 – Maximising the delivery of a wide range of affordable housing to meet the needs of all households.
- Priority 3 – Meeting the housing and related support needs of an ageing population.
- Priority 4 – Ensuring the specialist and supported housing offer meets current and future needs.
- Priority 5 – Improving the quality standards and management of the private rented sector.
- Priority 6 – The prevention of homelessness and rough sleeping.

Tameside Inclusive Growth Strategy 2021-26¹⁸ –brings Tameside’s growth strategy in line with, and take advantage of, the opportunities and objectives of the Greater Manchester Strategy, PfE (as this is developed), and the Greater Manchester Local Industrial Strategy, and to recognise that economic growth in the borough needs to, and is essential for, delivering more equitable outcomes for all our residents. This brings Tameside’s strategy in line with the developing focus of these documents on the importance of health, skills and earnings levels on the productivity of our economy. The strategy acknowledges the need to increase the variety of the housing offer across the borough, increasing both affordable housing supply as well as the availability of larger family homes, both in the benefits it can bring in attracting and retaining the skills we need, but also for the positive impact on health outcomes and aspirations that an improved housing offer bring. It also recognises the need to encourage and diversify the borough’s town centres, by increasing their mix of residential units. This is a key factor in their diversification, whilst offering the best access to work, culture and services.

The Tameside Specialist Housing Need Review (2020)¹⁹ (HNA) - provides the latest available evidence to help shape the future planning and housing policies of the area. The research provides analysis of the social, economic, housing and demographic situation across the area.

Tameside Local Plan – Tameside is preparing a new Local Plan which will be the main land use planning document for the borough and will replace the council’s adopted 2004 Unitary Development Plan²⁰. The Local Plan will provide the necessary policy detail where this is absent from the scope of PfE and will reflect its strategic policies. This will include, for example, the strategic site allocations, amendments/alterations to the Green Belt and a housing target for the borough. Initial consultation has taken place on the

¹⁸ <https://www.tameside.gov.uk/TamesideInclusiveGrowth>

¹⁹ <https://www.tameside.gov.uk/TamesideMBC/media/housing/Tameside-Housing-Needs-Assessment-2017.pdf>

²⁰ [\(tameside.gov.uk\)](https://www.tameside.gov.uk/Unitary-Development-Plan-(UDP))

scope and content of the Local Plan and the current timetable for Local Plan preparation is available in the Local Development Scheme²¹.

Approach and Methodology

- 1.16 Preparation of this Action Plan was informed by a range of work that the council has undertaken over the previous year. Housing monitoring is conducted annually and informs an update of the council's Strategic Housing and Economic Land Availability Assessment²² (SHELAA) and the housing delivery trajectory. This in turn provides baseline housing land supply information for PfE. From this monitoring the council is aware of a range of housing delivery challenges. However, in relation to the delivery of housing on major schemes granted consent and in control of volume house builders there is little evidence from the council's monitoring to suggest any impediment or delay in the delivery of homes.
- 1.17 In order to gain a better understanding of housing delivery and improve joint working, Tameside Council has established a Housing Delivery Group. This comprises officers from across the council, including Planning Policy, Development Management, Economic Development, Estates and Housing Strategy. The group meets regularly to discuss progress on planning applications and opportunities for intervention and possible solutions for stalled and complex brownfield sites that currently sit later in the housing supply period with the aim of bringing them forward and therefore boosting delivery.

Covid 19 Pandemic

- 1.18 It should be noted, however, that until March 2020 there was little reason to suspect that recent delivery trends in Tameside would not continue. However, the major health induced economic event, caused by the Covid-19 pandemic in March 2020 caused an initial jolt to the construction industry, which might have an impact on delivery rates over the next few years. Conversely, due to

²¹ <https://www.tameside.gov.uk/strategicplanning/localdevelopmentscheme>

²² [Strategic Housing Land Availability Assessment \(tameside.gov.uk\)](#)

the recent nature of this global event there is no robust evidence, at this early stage, to suggest that it could have such long-term impact to the delivery of new homes within Tameside. Instead, the Action Plan recognises the uncertainty that the pandemic may bring to the housing sector in the short-term. It will also re-examine the effect of the pandemic on building rates as part of the borough’s annual monitoring in 2021 and review the supply of land within the Tameside SHELAA and trajectory accordingly²³.

2.0 Housing Delivery

Planning Context

- 2.1 Once adopted, the council is committed to bringing forward residential development within the borough and to deliver the level of homes determined by PfE.
- 2.2 The distribution of housing in Tameside proposed in Table 7.2 of the Submission Draft 2022 PfE is set out in Table 2 below for reference only, as this plan is not yet adopted. For context however, this set the figure for Tameside covering the plan period 2020 – 2037 at 7,758. Whilst a phased approach to the annual housing target for Tameside is shown below the annual average target is 485 net new dwellings over the plan period.

Table 2: For reference only - PfE – Submission Draft 2022 – Tameside Housing Targets

Annual housing target 2021-2025	Annual housing target 2025-2030	Annual housing target 2030-2037
299	485	591

- 2.3 At the present time there is no adopted housing target for Tameside and the council will continue to use the government standard method for assessing local housing need based on national household growth projections until such a time that a target is adopted.

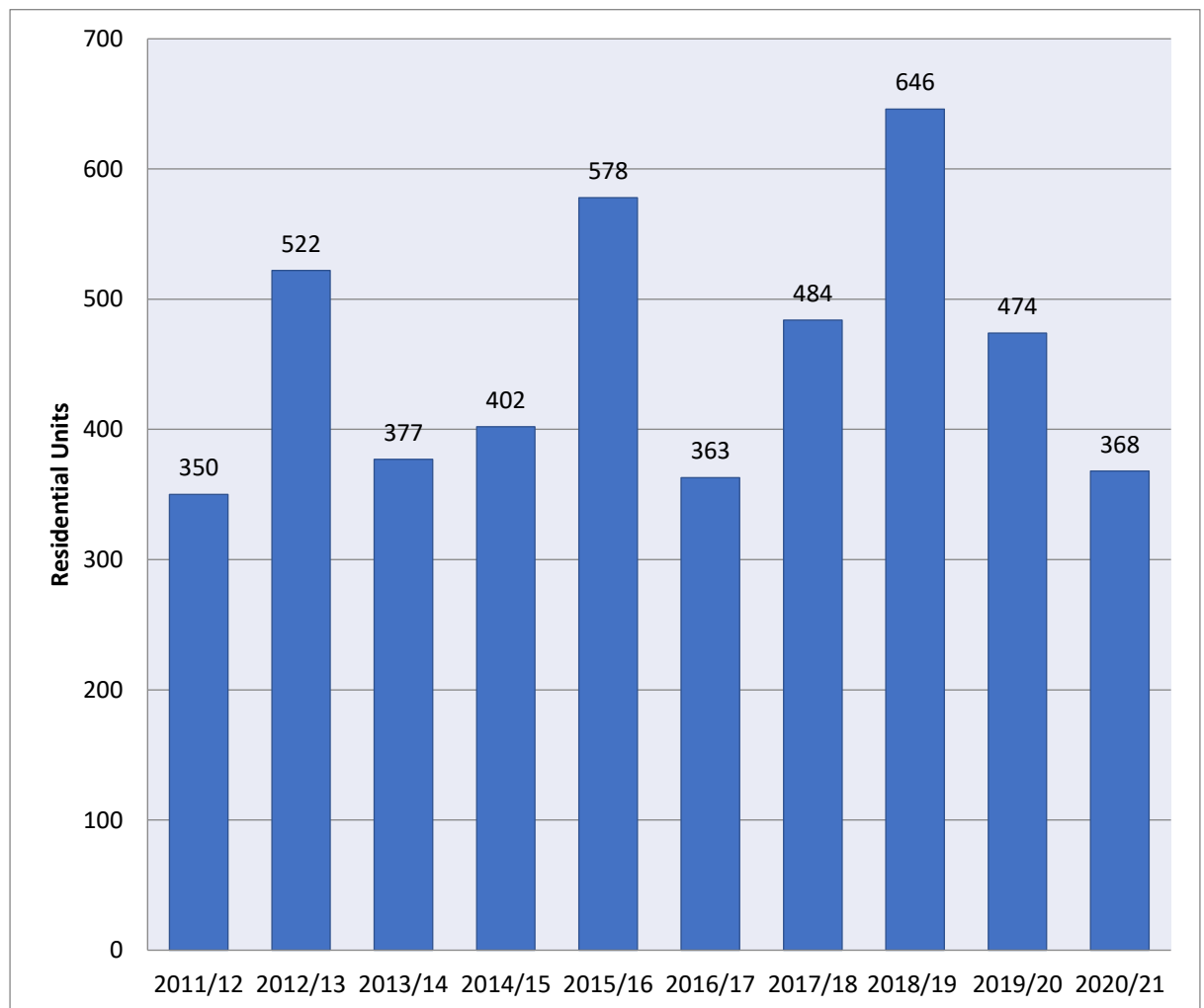
²³ <https://www.tameside.gov.uk/planning/ldf/evidence/shlaa>

Housing Supply and Delivery - Analysis

2.4 A total of 4,564 net residential units were delivered within Tameside over the ten year period 1 April 2011 to 31 March 2021 at an average of 456 net residential units per annum and is shown in Figure 1 below. Within this period there has been considerable variation in the annual rates of delivery, with the highest number recorded in 2018/19 (646 dwellings) and the lowest in 2011/12 (350 dwellings).

2.5 Figure 1 demonstrates the clear impact on housing delivery following the global financial crisis and the cyclical recovery in residential completions.

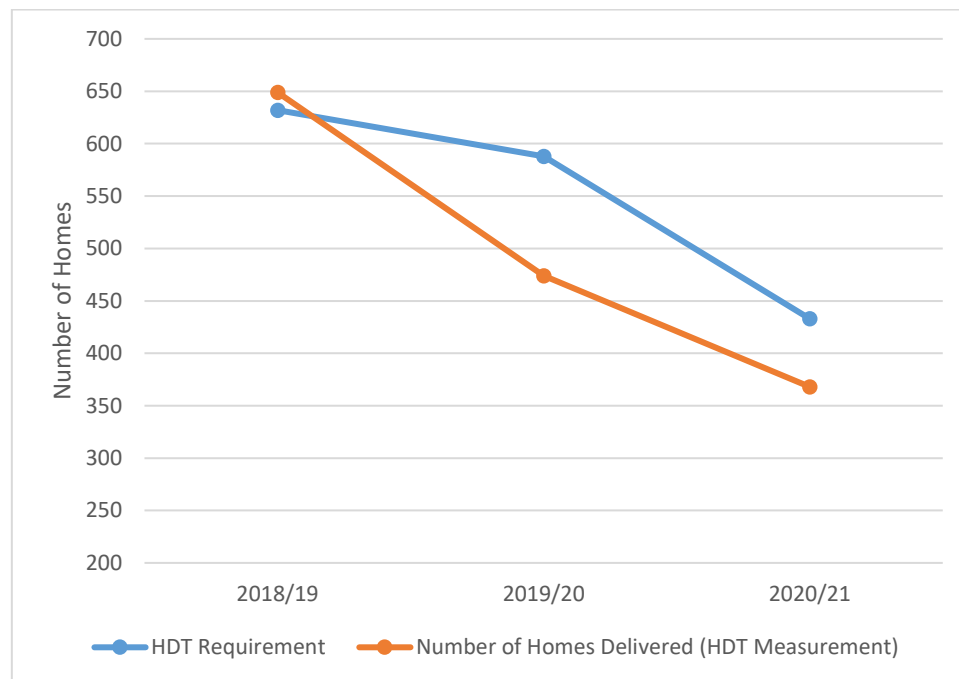
Figure 1: Tameside Net Dwelling Completions 1 April 2011 to 31 March 2021



2.6 Under-delivery can only realistically be considered against the assessment set out in the HDT which is presented in paragraphs 1.6 to 1.11. As Tameside achieved 91% of the residential units required over the three years covered by

the HDT, it can be concluded in line with NPPF²⁴ there has not been significant under delivery against the requirement. On an annual basis this is demonstrated in Figure 2 below.

Figure 2: Tameside HDT Measurement Results 2018 – 2021

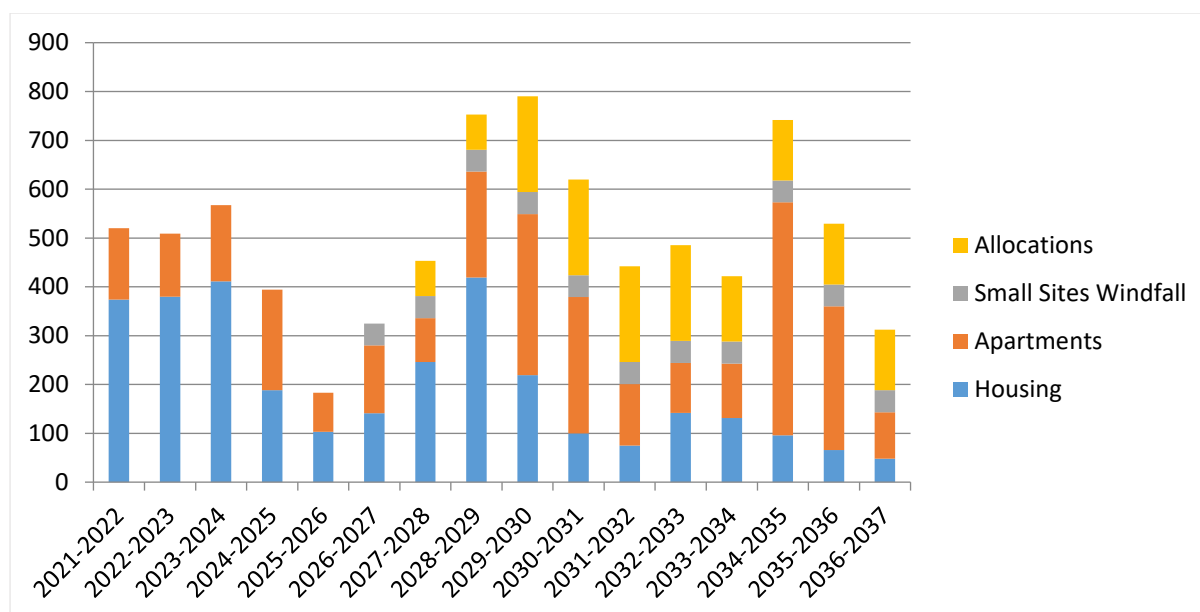


2.7 The 2021 Tameside housing trajectory in Figure 3 below shows that there is potential for peaks and troughs in the delivery of sites and new homes across the borough for the period 1 April 2021 to 31 March 2037. This is particularly notable within the 6-10 and 11-16 year periods of the supply:

- Completions are projected to decrease in the 0-5 year housing supply period with the year of least delivery predicted as being 2025/26;
- The 6-10 year period is predicted to contain a significant peak in delivery in 2028/29 followed by a reduction; and
- During the 11-16 year period there is a reduced level of predicted delivery with a spike in year 2035/35 before a more gradual reduction in delivery in the final two years of the trajectory.

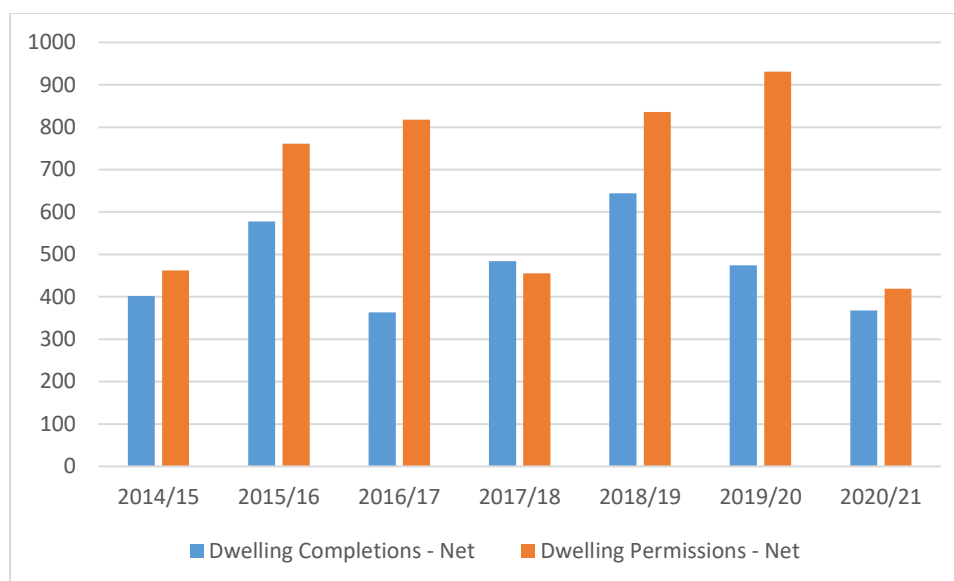
Figure 3: Housing Trajectory 2020/21 to 2036/37

²⁴ MHCLG, National Planning Policy Framework, paragraph 73c



- 2.8 From the above it is clear that to increase housing delivery to meet the transitional arrangement requirements of the HDT measurement then a step change in housing delivery and supply is required. Notwithstanding the continued positive upward trend in housing completions since 2011/12 the 2021 housing trajectory indicates future challenges in the overall supply and the timing of delivery when measured against local housing need.
- 2.9 Despite the fluctuations displayed in the trajectory the overall longer-term supply does look healthy for Tameside. Although this assessment is made against the Submission Draft PfE target. The projected over-supply in the medium term 2026/17- 2030/31 will negate periods of under-supply, but there is a risk that if projected completions do not deliver as expected then the HDT measurement may be failed in future years.
- 2.10 The above analysis is supported by data covering residential permissions granted per annum compared to dwelling completions per annum. Figure 4 gives a comparison between these sets of data and highlights that the rate of delivery has generally lagged behind the higher number of planning consents approved by the council.

Figure 4: Residential Permissions and Completions 2014/15 – 2020/21



2.11 However, this broad characteristic of consents being in excess of completions, while not considered unusual, could be attributed to a number of factors:

- number of units on larger permitted sites;
- annual build out rates; and
- time lag between grant of permission and completion of the first unit, rather than any failure to deliver units.

2.12 Data analysis on Tameside build out rates used to inform the 2021 housing trajectory is explained in further detail within the 2021 Tameside SHELAA²⁵.

2.13 Figure 5 shows the distribution of sites by number of units. The total residential yield for each category is shown in the brackets. Figure 6 shows the percentage of dwellings by site size and highlights that the delivery of 61% of the remaining supply is from 28 sites of over 50 units (9% of the total number of sites). The remaining 39% of supply is located on 285 sites of 50 units or less (91% of the total number of sites). This highlights the importance of both large and small sites in delivering the borough's housing supply.

Figure 5: Number of housing sites by site size category (figures in brackets in the legend are the number of units remaining in the housing land supply 2021-2037)

²⁵ [SHELAA 2020 21 Final Publication Version.pdf \(tameside.gov.uk\)](#)

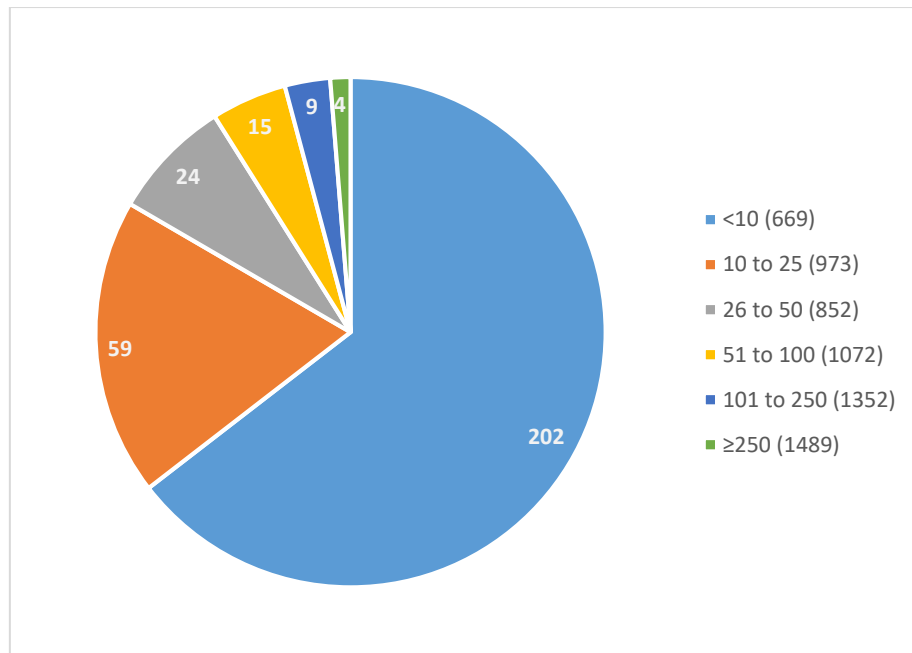
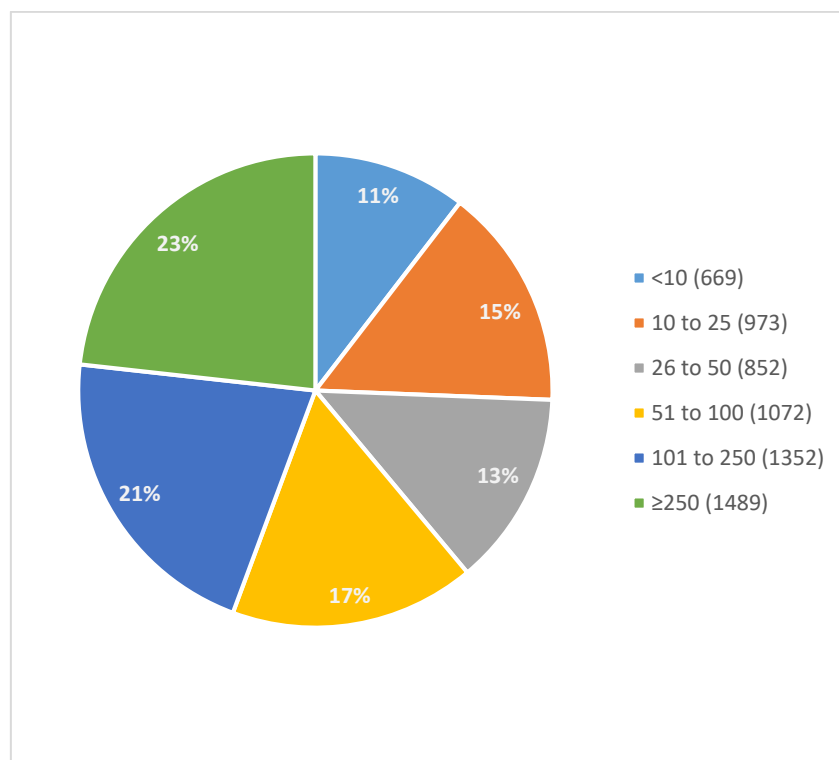
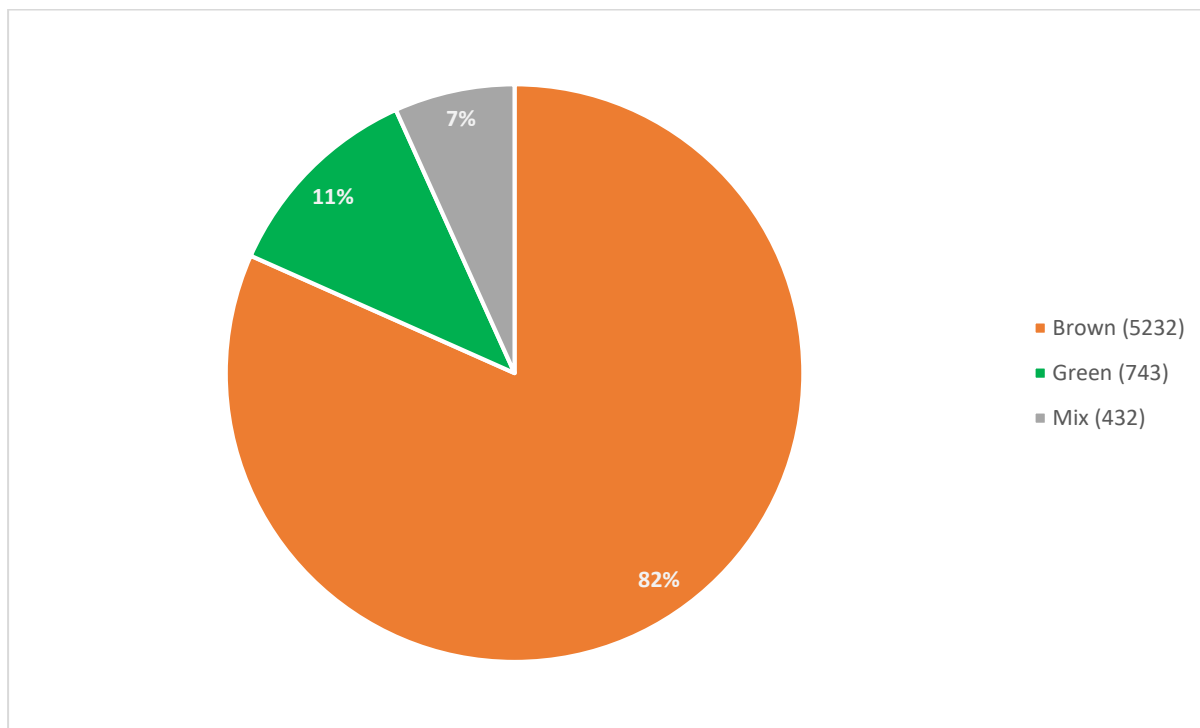


Figure 6: Percentage of dwellings by site size category (figures in brackets in the legend are the number of units remaining in the housing land supply 2021-2037)



2.14 Figure 7 highlights that 82% of the units in the housing supply are located on brownfield sites, thus demonstrating their significant contribution to Tameside’s urban regeneration.

Figure 7: Split between different categories of land in the housing supply (figures in brackets in the legend are the number of units remaining in the housing land supply 2021-2037)



Other Issues

Stalled Sites and Empty Properties

- 2.15 The council's commitment to housing delivery is encapsulated in its approach to stalled development and returning empty homes back into use.
- 2.16 Returning empty homes back into use is a sustainable way of increasing the overall housing supply, meeting housing need and reducing the negative impact that empty homes can have on communities.
- 2.17 2021 MHCLG data²⁶ identifies the total number of vacant dwellings in Tameside as 2,279 (of which long term vacant dwellings total 809). This equates to 2.2% of the 103,835 dwellings recorded by MHCLG in March 2021²⁷.
- 2.18 The Council is currently in the process of establishing a series of collaboration agreements with a range of place based registered providers. One of the

²⁶ MHCLG, Live Table 615: vacant dwellings by local authority district: England, from 2004

²⁷ MHCLG, Live Table 100: number of dwellings by tenure and district, England

cornerstones of these new working arrangements will be the requirement for our housing partners to bring long term empty properties back into use. This will include long standing empty or residential homes that continue to create problems for local communities. In addition, we want to work with partners to return vacant commercial building back into use to create new homes.

- 2.19 Essentially this is extending the work already being carried out with partners like Ashton Pioneer Homes (APH) and One Manchester. APH have worked with the council and empty property owners to bring three vacant commercial buildings and spaces back into use delivering 25 new affordable housing units on Stamford Street in Ashton town centre. Similarly, One Manchester are continuing work on the former Tax Office in Ashton centre to provide 51 one and two bedroom apartments which is due to complete in 2022. Eligible Grant funding to support empty property is provided by Homes England.
- 2.20 Stalled and dormant sites have been identified as a salient feature of the housing land supply in Tameside for a number of years. This has led to a proactive approach where the Council has identified a pipeline of sites that have extant planning permissions and attempted to re-engage with developers in order to try and better understand the reasons why the sites did not come forward for development following consent and try to remove the barriers to the delivery of new homes. A successful example of this approach is the scheme delivered by Mossclare on Castle Street, Stalybridge, where the council worked alongside the registered provider to deliver 56 affordable apartments, completed during 2020/2021.

Lichfields – Start to Finish (Second Edition) 2020

- 2.21 To supplement Tameside’s local evidence based assumptions Lichfields ‘Start to Finish’²⁸ review on the speed of delivery on large-scale housing developments sites has also been referenced due to the limited data available for the borough.
- 2.22 Lichfields originally published the findings of their desk-based analysis of housing delivery on 70 different strategic sites in November 2016 with a

²⁸ <https://lichfields.uk/content/insights/start-to-finish>

revised version published in February 2020. This highlighted the key characteristics of development on larger sites including:

- 3.3 years average timeframe from validation of first application to completion of first dwelling on sites of 1-99 dwellings and 4 years on sites of 100-499 dwellings;
- Just over 2 years for the average planning approval of schemes of 100-499 dwellings;
- Identifies a number of factors influencing build out rates – ‘absorption rate’; strength of the local housing market; number of sales outlets; the tenure of housing being built; whether the site is brownfield or greenfield; and geography and site configuration; and
- For sites of 100-499 units size the mean annual build out rate was calculated at 55 units, whilst sites of less than 100 delivered a build out rate of circa 22 units per annum.

Letwin Review (2018)

2.23 Following on from analysis contained in Start to Finish came the Final Report of the Independent Review of Build out Rates²⁹ by the Rt Hon Sir Oliver Letwin. This focused on the issue of the build out rate on the largest sites in areas of high housing demand. The report concluded that the homogeneity of the types and tenures of homes on offer on large sites was a fundamental driver of a slow build out rate. Although the review highlighted slow build out rates on large sites it did not suggest that rates would increase if smaller sites were relied on or if an attempt to solve the slow absorption rate was attempted by reducing house prices. Key to increasing build out rates would be varying housing types, designs and tenures on large sites in order to accelerate the overall absorption rate.

Root Cause Analysis

2.24 The root cause analysis provides a summary of the key factors affecting the delivery of housing in the borough.

²⁹ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

- 2.25 Delivery of new homes in Tameside predominantly relies on sites identified in the most up to date iteration of the council’s SHELAA rather than residential site allocations in the adopted 2004 UDP as these have predominantly been built out.
- 2.26 Despite the high number of dwelling permissions granted per annum the level of completions lag behind. Delivery is also relatively reliant on a small number of large sites (see para 2.14), many of which are in the control of national house builders.
- 2.27 A new Local Plan alongside PfE with smaller, complementary site allocations would help to provide balance within the pipeline and reduce the risk associated with an overreliance on a small number of large sites.
- 2.28 Whilst the analysis of the Letwin Review is compelling it is not directly applicable to the housing supply in Tameside because of the 1,500 unit lower limit used in the analysis. However, Lichfield’s ‘Start to Finish’ report provides greater insight, into the constraints on housing delivery, on large sites in Tameside. The Lichfields analysis concludes that larger sites should be delivering circa 60 units per annum, but analysis of the completions data on the larger sites of 100+ houses in the borough has identified an average completion rate below this at 36 dwellings per annum³⁰. It should also be noted that the Tameside figures are likely to be lower than the Lichfields study results as Tameside’s include the first year of delivery and this is unlikely to cover the whole monitoring year.
- 2.29 Whilst there are a number of large sites that will continue to deliver over the next few years, the challenge will be in bringing forward other brownfield sites of scale from later within the supply period. This could be partially addressed by ensuring that planning applications for new larger sites both pre and post consent, are dealt with efficiently.
- 2.30 In addition, SME house builders are present in the borough’s housing market and it will be necessary to gain a greater understanding of the barriers

³⁰ TMBC, April 2021, Strategic Housing and Economic Land Availability Assessment 2021-2037, Table 7 Estimated Residential Build Out Rates.

(including, for example land availability and values) to increased delivery for this sector.

3.0 Key Actions and Responses

3.1 In answer to the root cause analysis the key responses of the HDT Action Plan are framed by two overarching themes:

- Continue to improve resilience, capacity and ability within the planning service to deal with all major residential development proposals;
- Taking a more proactive role in the promotion and delivery of housing.

3.2 The actions are set out in more detail under the following themes, with actions, timescales and responsibility for delivery identified for each.

Table 3: Improving the resilience, capacity and ability within the planning service to deal with all major residential development proposals.

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/Tasks
Embed a strong culture at all levels to make the delivery of homes a guiding principle in decision making.	Continue to capacity build to develop appropriate skills and innovative development solutions.	Fully resourced and skilled workforce, including s106 monitoring.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning 	<ul style="list-style-type: none"> • Housing Growth prepared a report accepted by Cabinet in March 2022 in relation to charging of s.106 fees.
	Continue to provide briefings as appropriate for Speakers Panel	Better understanding of key planning issues ahead of meetings and	Short	<ul style="list-style-type: none"> • Assistant Director of Planning • Development Manager 	

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/Tasks
	(planning) Members on significant planning applications.	reduced delay in decision making.			
	Engage with key partners and stakeholders to communicate the HDT Action Plan and the council's commitment for sustainable housing and economic growth.	Broader understanding of the council's ambitions and the benefits of sustainable growth.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Housing Growth Lead • Assistant Director of Planning 	<ul style="list-style-type: none"> • Housing Growth to promote through the RP Partnership.
Review and improve the residential planning application process.	Continual business review to improve processing time for major planning applications.	Minimise delay in processing planning applications.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning • Development Manager 	
	Review the use and discharge of	Minimise the number of conditions used, reduced number of	Short / Medium	<ul style="list-style-type: none"> • Assistant Director of Planning • Development Manager 	

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/Tasks
	planning conditions.	pre-commencement conditions and minimised delays in processing discharge of conditions applications.			
	Improve the efficient execution of s106 agreements.	Reduce the time taken to secure agreements and increase the monitoring of those that are in place.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Head of Legal Services • Assistant Director of Planning • Development Manager 	<ul style="list-style-type: none"> • Housing Growth to continue work to standardised 'boilerplates' for s.106 agreements to speed up the process, and provide other expertise in this area when needed. • Housing Growth to input on sites where affordable housing is required at the earliest possible stage.

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/Tasks
	Continue to promote Planning Performance Agreements where appropriate for large-scale complex housing sites.	Agreement on a realistic response and determination timescales.	Short	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning • Development Manager 	
	Promote formal pre-application process.	Improve quality of service offer and detail received within application submissions leading to quicker decisions.	Short	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning • Development Manager 	<ul style="list-style-type: none"> • Housing Growth to input affordable housing requirements at pre-application stage or earlier, for example through the SHELAA.
	Identify a cross departmental lead to work with developers to support and ensure the timely delivery on sites which require planning	Increase the build out rates and number of residential completions.	Short	<ul style="list-style-type: none"> • Director of Place • Housing Growth Lead • Director of Operations and Neighbourhoods 	<ul style="list-style-type: none"> • Regular sharing (quarterly) of information to ensure that sites with permission that are due to expire and have not started or that are stalled are

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/Tasks
	permission or on sites that have planning consent but that are yet to start or are stalled.				kept under review and options to bring them forward are fully explored and recorded.

Table 4: Taking a more proactive role in the promotion and delivery of housing

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
Support the adoption of Places for Everyone (PfE)	Ensure the provision of information and co-operation lead to the successful examination and adoption of PfE.	Adoption of an up-to-date housing target	Medium / Long	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning • Planning Policy Team Manager 	
Adoption of Tameside Local Plan	Completion of stages leading to examination and adoption of the Local Plan.	Increased certainty relating to sites needed to accommodate planned growth.	Medium / Long	<ul style="list-style-type: none"> • Director of Place • Assistant Director of Planning • Planning Policy Team Manager 	
Annual monitoring of housing delivery	Complete the annual monitoring of housing land supply and completions through update of the council's Strategic Housing and Economic Land Availability Assessment, including through engagement with developers.	Publish monitoring data as evidence to support plan-making and decision-taking.	Short	<ul style="list-style-type: none"> • Assistant Director of Planning • Planning Policy Team Manager 	

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
Housing Delivery Group	Continue to explore positive actions in relation to housing delivery, particularly in relation to bringing forward challenging sites earlier in the supply.	Increase the delivery of homes.	Short / Medium	<ul style="list-style-type: none"> • Planning Policy Team Manager • Development Manager • Housing Growth Lead • Economic Growth Lead 	<ul style="list-style-type: none"> • Unlocking sites for RP partners is one of the objectives for the RP Partnership, which was launched in March 2022. • Prioritise sites for bids relating to Brownfield Housing Fund/levelling up and other such grants / financial support where available.
Alternative delivery models / opportunities	Explore potential and options for bringing forward housing using council owned land and assets in accordance with the SAMP.	Increase the delivery of homes using council owned land and assets.	Medium	<ul style="list-style-type: none"> • Director of Place • Head of Development and Investment • Assistant Director of Planning • Assistant Director Strategic Property 	<ul style="list-style-type: none"> • A new council disposal policy was approved in July 2020 and a number of sites have now been declared surplus and marketed.

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
				<ul style="list-style-type: none"> Housing Growth Lead 	<ul style="list-style-type: none"> Matthews & Goodman have been appointed to carry out a review of a number of council assets with a view to creating a 'pipeline' of development opportunities that would be brought forward in accordance with the council's approved disposals policy. Links with Housing Growth Strategy for delivering extra care and other social care related projects, which will be a large part of the RP Partnership.

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
	Work proactively with Registered Providers	Proactive council engagement with stakeholders to bring forward new affordable housing.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Head of Development and Investment • Housing Growth Lead 	<ul style="list-style-type: none"> • This is a key aim of the RP Partnership which was launched in March 2022.
	Work closely with and gain support from agencies/partners to seek funding and address possible infrastructure constraints and facilitate landowner mediation where required.	Proactive council engagement with stakeholders to bring forward new housing.	Short / Medium	<ul style="list-style-type: none"> • Director of Place • Head of Development and Investment • Housing Growth Lead 	<ul style="list-style-type: none"> • Already delivered via Housing Growth through Housing Infrastructure Fund (Marginal Viability Fund) and Brownfield Housing Fund. • Future opportunities for similar funding will be explored.
	Proactively respond to funding opportunities when they arise to provide additional	Proactive council engagement with	Short / Medium	<ul style="list-style-type: none"> • Housing Growth Lead • Project Manager – Housing Growth 	<ul style="list-style-type: none"> • Continues to deliver via Housing Growth through Housing

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
	expertise, support and capacity to increase the delivery of new homes.	stakeholders to bring forward new housing through a coordinated approach to funding opportunities.			Infrastructure Fund (Marginal Viability Fund) and Brownfield Housing Fund. <ul style="list-style-type: none"> • For example a total of 11 sites which have BHF funding secured, and 610 units will be delivered. • Future opportunities for similar funding will be explored.
	Promote diversity of housing type, tenure and design in new schemes and promote modern methods of construction by exploring the delivery of new Local Plan policy.	Increase the absorption rate and the delivery rate of new homes.	Medium / Long	<ul style="list-style-type: none"> • Assistant Director of Planning • Housing Growth Lead • Development Manager • Planning Policy Team Manager 	

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
Small sites development	Explore how the council can support SME developers, specifically through a potential developer forum.	Increase in planning applications and housing completions.	Medium / Long	<ul style="list-style-type: none"> • Assistant Director of Planning • Housing Growth Lead • Development Manager • Planning Policy Team Manager 	<ul style="list-style-type: none"> • Housing Growth can assist to link SME developers with GM Housing Investment Loan Fund, and possible suitable council owned sites. • For all site of less than 10 units, Housing Growth may assist with bringing these forward to meet TMBC needs (e.g. Children’s Services) • Housing Growth to work with Planning to identify suitable self-build and custom build plots.

Actions	Task	Outcome	Timescale	Responsible Lead Officer(s)	Progress on Actions/ Tasks
	Explore how the council can promote small/medium sites, including providing guidance on how to bring them forward and highlighting these opportunities to SME developers.	Increase in planning applications and housing completions.	Medium / Long	<ul style="list-style-type: none"> • Assistant Director of Planning • Housing Growth Lead • Development Manager • Planning Policy Team Manager 	<ul style="list-style-type: none"> • Housing Growth to look at linking up small sites with RPs, and in particular to help meet social care housing related needs for a range of client groups.
Tackling Empty Properties	Explore how the council can continue, through the Registered Provider Partnership, to address the issue of empty properties.	Decrease in the percentage of empty properties.	Short / Medium / Long	<ul style="list-style-type: none"> • Housing Growth Lead 	

4.0 Project Management and Monitoring

Project Management

- 4.1 The implementation of the identified actions will require strong leadership across council service areas. The Director of Place, assisted by the Housing Delivery Group, will be responsible for ensuring the actions set out in this Action Plan are monitored and reviewed to ensure effective delivery, which will be reported on as part of reviewing this Action Plan.

Monitoring

- 4.2 In addition to regular review of the actions through the monthly Housing Delivery Group meeting the HDT Action Plan will be reviewed and updated on an annual basis as part of the council’s programme of monitoring.

Appendix 1 – MHCLG HDT Measurement January 2021

Table 5 showing number of homes required and number of homes delivered.

ONS code	Area name	Number of homes required	Number of homes required	Number of homes required	Total number of homes required	Number of homes delivered	Number of homes delivered	Number of homes delivered	Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
		2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
E08000008	Tameside	632	588	433	1653	649	474	387	1510	91%	Action plan