

## Housing Delivery Test: Action Plan



August 2019

**Rotherham Metropolitan Borough Council**

**Housing Delivery Test Action Plan**

**August 2019**

**Prepared by the Planning Service in conjunction  
with the Strategic Housing and Development  
Service**

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## Executive Summary

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 first test is by 19 August 2019.

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 will publish a Local Development Scheme in due course 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.
- 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 to create well-designed, attractive and accessible spaces where people want to live.

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 the types of housing needed. The Council will continue to pursue these actions over the coming months.

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

### **Current activity:**

- Granting planning permission for over 700 new homes on allocated housing sites since the Sites and Policies Document was adopted in June 2018.
- 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 1,300 new homes at time of writing.

- Partnering with developers to deliver new homes, under programmes such as Rother Living, cluster sites, and further specific projects at the Bellows a former shopping centre, Rothwell Grange, a former older person's care home and town centre sites.
- Working proactively through engagement with land owners and developers to promote delivery of "inactive sites". A list of inactive sites or small sites in Council ownership but not currently marketed, is provided in appendix two.
- 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 annual Housing Developer Summit and other regular key events and forums.
- Updating the joint Rotherham/Sheffield Strategic Housing Market Assessment (SHMA) with Sheffield City Council.
- Working to improve the deliverability of brownfield and greenfield sites by preparing Supplementary Planning Documents (SPDs) on development viability and affordable housing provision.
- Working to deliver the Bassingthorpe Farm Strategic Allocation in the longer term, through joint working with the majority landowner, Fitzwilliam (Wentworth) Estates. A masterplan and comprehensive technical studies have been prepared, funded through Homes England Capacity Funds.
- 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.
- Monitoring of S106 planning obligations and trigger points to ensure timely delivery of key infrastructure and affordable housing provision.
- 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.
- Ensuring adherence to approved masterplans or refreshing the approved masterplan to reflect subsequent detailed planning permissions.
- To maintain momentum and delivery rates on site through ensuring that S106 planning obligations and triggers are achieved in a timely manner; and the delivery of strategic infrastructure to meet identified requirements.

### **Future Actions**

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.

- The Council will bring forward land in its ownership for market sale or for development with partners to meet needs in specific locations and to build investor confidence in that locality and 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 constraints requiring resolution through timely strategic infrastructure delivery, will enable development on specific sites.
- Encourage 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 the lack of activity is preventing a defined scheme from being implemented.

# 1. Introduction

1. The revised National Planning Policy Framework (July 2018) introduced a new Housing Delivery Test. The NPPF was subsequently updated in February 2019. The first results of the test were published in February 2019 and showed that Rotherham had achieved 92% of its required housing delivery. The Council is therefore required to publish a Housing Delivery Test Action Plan analysing the causes of under-delivery and setting out the actions it proposes to take to remedy this situation.
2. Details regarding completions and commitments are provided in the Addendum to the Strategic Housing Land Supply Assessment (SHLAA) 31 March 2018, published alongside this Action Plan. 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. The action plan demonstrates the Council's commitment by responding positively to the challenge of increasing housing delivery.

## **Purpose, Objective and Status**

4. The action plan will assess rates of delivery and analyse the root causes for identified under-delivery; it will review key issues and challenges facing the Borough in meeting its housing delivery target and set out the Council's response and the actions it proposes to undertake to ensure increased house building in the Borough.
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.
6. To support the preparation and adoption of the Local Plan the Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) and subsequent assessment and publication of its Housing Land Supply update and five-year Housing Land Supply position. The documents used in the preparation of the Local Plan and subsequent updates are all available on the Council's web site.

## **Relationship to other Plans and Strategies**

7. Documents referred to in the action plan are listed in the References section at the end, with links provided.
8. 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
9. The following is a list of all appropriate documentation prepared and published by Rotherham Metropolitan Borough Council:
- Addendum to the Strategic Housing Land Availability Assessment (SHLAA) 31 March 2017: Housing Land Supply Position Updated to 31 March 2018
  - Council Plan 2018-2019
  - 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

**Methodology adopted in preparation of this Action Plan**

10. The action plan's preparation has been undertaken in partnership with other services within the Council including the Strategic Housing and Development Service.
11. The methodology adopted is a synthesis of a number of work streams and pulls together strands of information from various evidence base sources and actions the Council is already undertaking. It also presents an analysis of what has happened during the preparation and subsequent adoption of the Local Plan; the engagement undertaken with the development industry and landowners at that time; and the subsequent analysis of a selection of key / strategic sites and their progress following allocation in the Sites and Policies Local Plan.
12. The action plan draws on other studies: the Rotherham/Sheffield Strategic Housing Market Assessment (SHMA) and the Housing Development Viability Appraisal Refresh Study which uses site allocation typologies to draw pertinent conclusions. A summary of some of the key actions undertaken by the Local Planning Authority in dealing with submitted planning applications and pre-application proposals, and the actions of the Strategic Housing and Development Team are also provided in the action plan.
13. To more fully understand the land supply position within Rotherham, the Council prepared a comprehensive Strategic Housing Land Supply Assessment (31/03/2017) prior to the adoption of its Sites and Policies Local Plan in June 2018. It provides a clear understanding of all sites committed and allocated and any additional non-Green Belt sites with and without constraints that are potentially suitable for residential development. An addendum update to the SHLAA has now been prepared (31 March 2018) and is available to download from the Council's website.

14. 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 prior to the adoption of the Local Plan.
15. The Council recognises and values engagement with land owners, housing developers, agents, and housing associations. Given the most recent level of activity in the adoption of its Local Plan, this also 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.
16. For background information and context it is relevant to note the following steps undertaken prior to the adoption of the Local Plan.

**Table 1: Local Plan Examination of Housing Land Supply**

Date	Activity Undertaken	Document Reference Number*
29 July 2016	The Inspector examining the Local Plan issued Note 1 regarding Housing Land Supply	ID014
24 August 2016	The Council noted the discussions held with representatives of the house building industry to clarify the Council's housing supply methodology and the various outputs.	RMBC027
26 August to 23 September 2016	Five Year Housing Land Supply document published for consultation purposes	RMBC029 RMBC030
17 October 2016	Additional hearing date to discuss the housing land supply position.	Responses to Consultation
11 April 2018	The Inspector issues his report and appendices into the examination of the Rotherham Sites and Policies Document	Report of Examination

\* All documents available from the Sites and Policies Examination Library:  
[https://www.rotherham.gov.uk/localplanexamination/homepage/6/examination\\_library](https://www.rotherham.gov.uk/localplanexamination/homepage/6/examination_library)

17. The information in the table above, demonstrates the most recent level of engagement and in-depth review of sites undertaken with the development industry and their representatives prior to the allocation of these sites in the Local Plan.

18. The SHLAA 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. Paragraph 62 of the Inspector's report into the examination of the Rotherham Sites and Policies Plan, notes that the Council re-assessed 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. Detailed housing trajectories (included in the SHLAA) were also produced. The Inspector considered that the careful and pragmatic analysis that the Council carried out on each of these sites is reasonably based and produces a fair estimation of what is likely to be delivered on each of the allocations and when.
19. Further, paragraph 63 notes that the Council will need to monitor what is happening on the ground to ensure that housing delivery proceeds as anticipated. Paragraph 80 notes that the Council produced a considerable amount of detailed evidence relating to the 5 year supply. This included substantial areas of land for development, site capacities, the likely timing of its release, and realistic assessment of build-out rates. On the basis of this work the Inspector found that the Council through the Plan (as modified) is committed to ensuring that sufficient housing land is provided at the appropriate time to meet anticipated needs.
20. In preparing the Local Plan, all site-based evidence has been collated and key issues summarised in the Site Development Guidelines included at Chapter 5 of the Sites and Policies Document. Review and analysis of available evidence has included preparation of the Integrated Impact Assessment; transport assessment; Green Belt Review; impact on the natural environment / historic environment / archaeology / landscape impact. The impact of surface water flooding has also been assessed.
21. Evidence base research and surveys were conducted in conjunction with specialist officers within the Council and with support from consultancies with specialist skillsets. The site-based evidence has been systematically reviewed and recorded for consultation purposes and submission to the Planning Inspector during the Local Plan examination.
22. The historical review of all sites includes: desk top review of previous planning applications submitted; those granted planning permission or refused and analysis of any constraints associated with the site. Site visits for each potential allocation has been undertaken to aid understanding of the landscape, geography, topography and noted visual constraints.
23. The synthesis of this information for site allocations in the Local Plan enables an assessment of strategic infrastructure requirements to be completed and an Infrastructure Delivery Plan prepared.
24. This is the evidence base the Council uses in the determination of submitted planning applications specifically for those sites allocated in the Local Plan; and has guided the Council in its review of the delivery of site allocations and its investigation into the causes of any possible under-delivery of sites in the preparation of the action plan.

25. This approach to understanding each of the possible site allocations enables clear understanding of the issues facing on-site delivery and assists in the identification of any potential actions to unlock development on site.
26. The scope of 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.

## 2. Housing Delivery Analysis

### Local Plan context, completions and commitments

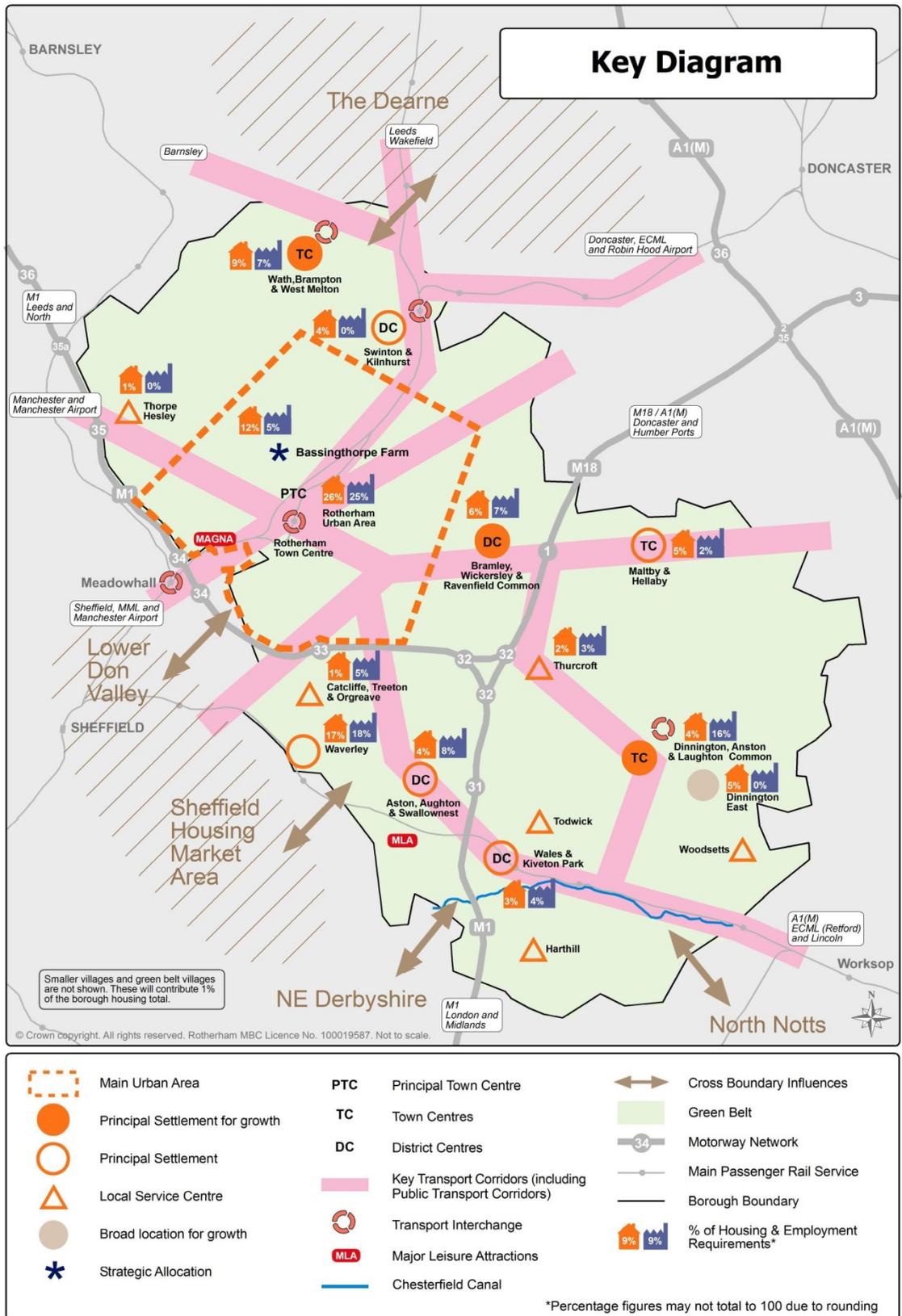
27. Section 3 of the Core Strategy (adopted 10 September 2014) sets out the Strategy relating to Rotherham; the most relevant of these include:
- managing the impact of an ageing population on future housing need, the location of development, accessibility to services and facilities and the provision 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.
28. 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. ...”*
29. Core Strategy policies seek to support existing communities and ensure that 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.
30. 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...”*
31. 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:*

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

32. The Key Diagram (Section 5.1 of the Core Strategy 2014) 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 sufficient evidence to justify the removal of this new community from the Green Belt. The policy also proposes a broad location for growth to the east of Dinnington, although no Green Belt land release was made in the Core Strategy.
33. Rotherham Council has prepared and adopted a Sites and Policies Document (June 2018) and together with the Core Strategy this is the Rotherham Local Plan. It provides a long-term development strategy, setting out policies and proposals for new development in the Borough.
34. Policy SP1 of the Sites and Policies Document identifies all allocations to meet the development requirement of the spatial strategy. Site allocations were made in the Sites and Policies document, following the examination of the Local Plan and the submitted Green Belt Review. To support the adoption of its Local Plan the Council undertook both strategic and detailed Green Belt reviews; the Local Plan allocates sites formerly within the Green Belt to meet identified housing needs. The subsequent adoption of the Sites and Policies document delayed delivery against the Core Strategy housing requirement. Those sites committed in the supply, will work their way through to delivery in the near future.
35. Monitoring of allocation commitments and completions is undertaken in the Addendum to the SHLAA 2018.

**Figure 1: Rotherham Local Plan: Core Strategy Key Diagram**



36. The Housing Delivery Test uses a lower requirement figure for Rotherham than the Core Strategy<sup>1</sup>, and 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 onwards demonstrates that housing completions in Rotherham have yet to meet or exceed the annual Core Strategy requirement. In light of this performance on housing delivery, the revised NPPF and the new Housing Delivery Test, the Council has resolved to commence a partial update of its Core Strategy and will publish a Local Development Scheme in due course setting out a timetable for the update.
37. The standard methodology produced by Central Government, results in a minimum requirement of circa 580 net new dwellings per year in Rotherham. This is around 380 net new dwellings lower than the Core Strategy requirement of 958 dwellings per annum.
38. The recently published, local housing need figure is therefore significantly different to the current Core Strategy requirement. The importance of partially updating the Core Strategy is essential to establishing a realistic plan requirement for HDT and five year housing land supply calculations in the future.
39. The Annual Monitoring Report 2018 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 2: Rotherham dwelling completions 2015/16 – 2018/19**

New dwelling completions per financial year			
2015-16	2016-17	2017-18	2018 -19*
585	605	472	427

\* Data from 2018/19 is not considered in calculating the HDT results for February 2019 but is helpful in looking forward to possible future requirements to prepare an action plan in subsequent years.

40. The main reason for Rotherham’s HDT result is the very low housing completions in the last year 2017/18; (completions for 2018/19 are provided in the above table for information only). This is partly due to the time lag between adoption of the Sites and Policies Document (2018) to new housing sites coming through the planning system, gaining planning permission and development commencing on site. The time lag issue is exacerbated for Rotherham due to the fact that Green Belt release was required through site allocations to be able to grant planning permission.
41. 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

<sup>1</sup> In accordance with the Housing Delivery Test Rule Book: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

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. Housing need is based on a combination of household projections and local plan housing targets.

42. The Housing Delivery Test result for Rotherham is 92%, therefore the Council is required to publish an 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, as about a third of all councils are in this position in the first year of the test. The results published in February 2019 for Rotherham are shown below:

**Table 3: 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: 2018 measurement
2015-16	2016-17	2017-18		2015-16	2016-17	2017-18		
639	629	546	1,815	585	605	472	1,662	92%

### **Rotherham Housing Delivery Context**

43. Wider market conditions and developer confidence are also significant factors. Prior to adoption of the Local Plan, and during the financial year 2018/2019, delivery on sites has relied on the completion of large site allocations committed in the Unitary Development Plan at Sawnmoor Road, Thurcroft and the Wickets at Upper Haugh, Rawmarsh. In addition, planning permission was subsequently granted for the creation of a new sustainable community at Waverley.
44. The delivery of Waverley new community temporarily stalled when the initial draft route of HS2 was published; this showed the route of HS2, through the Waverley site. The proposed route has now been moved further eastwards and no longer impacts on delivery of Waverley. Since this realignment, further detailed planning applications for Waverley have been granted, with more pending, and build rates are expected to significantly improve.
45. The Strategic Housing Land Availability Assessment (31 March 2018) reviews dwelling completions, capacity, density and delivery of all sites in a range of sizes and locations throughout the Borough. 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 located sites; and also previous delivery rates of affordable housing achieved through planning policy requirements; as well as providing the anticipated delivery rates year on year.

46. In addition to the Strategic Allocation of Bassingthorpe Farm for and approximately 2,400 new homes in the Core strategy policy CS1, policy SP1 of the Sites and Policies Document, allocates a number of additional sites for development. Table 2 of Policy SP1 'Sites allocated for residential use' refers.
47. An update to the Strategic Housing Market Assessment (SHMA) is being prepared as a joint commission with Sheffield City Council and the two Councils have appointed consultants CRESR (Centre for Regional Economic and Social Research) at Sheffield Hallam University. Publication of this research is anticipated later in 2019. 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 housing policies and strategies and to guide future housing delivery.
48. 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.
49. In conclusion, there is an under supply of housing, generally, but the shortfall of affordable housing is not being fully addressed either with the demand for affordable housing increasing threefold when compared with the previous SHMA.
50. A number of 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 submarkets, 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 relets.

51. 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**

52. In preparing its Local Plan, the Council published a supporting Infrastructure Delivery Plan, prepared by Roger Tym and Partners 2012. This Study identifies the strategic infrastructure, supporting services and community facilities required to meet the needs of new and expanding communities.
53. Subsequently further work was undertaken in the preparation of the Community Infrastructure Levy. The CIL came into operation on 3 July 2017. The introduction of the CIL, with its differential rates, introduces an entirely new line of cost that affects a site's land value estimate.
54. Reference to Core Strategy policy CS32 Infrastructure Delivery and Developer Contributions is also relevant and Annex A of the Core Strategy includes the Infrastructure Delivery Schedule.
55. Supporting evidence base documents exploring the Viability of delivering affordable housing on Small and Large Sites (2012) were also prepared to support the Core Strategy through its examination. An update of this study: Housing Development Viability Appraisal Refresh Study is currently in preparation, and its publication is anticipated later in 2019. This study will support the preparation of two new Supplementary Planning Documents: 'Affordable Housing' and 'The Preparation of Site Based Development Appraisals: Contesting Viability'.
56. The Evidence Base study reflects on 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 also sets out options wherein some of the sites are not viable and the options available to the Council in these circumstances. For instance through the negotiation of a lower level of affordable housing on site; deferment of its provision until later phases of development; or no provision without additional funding.
57. A benefit of this study is the level of understanding of the potential for site allocations to fund essential strategic infrastructure in addition to the payment of the Community Infrastructure Levy, and to provide affordable housing to meet policy requirements. It will enable the Council to robustly defend its policy position in future on many greenfield sites.
58. 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.

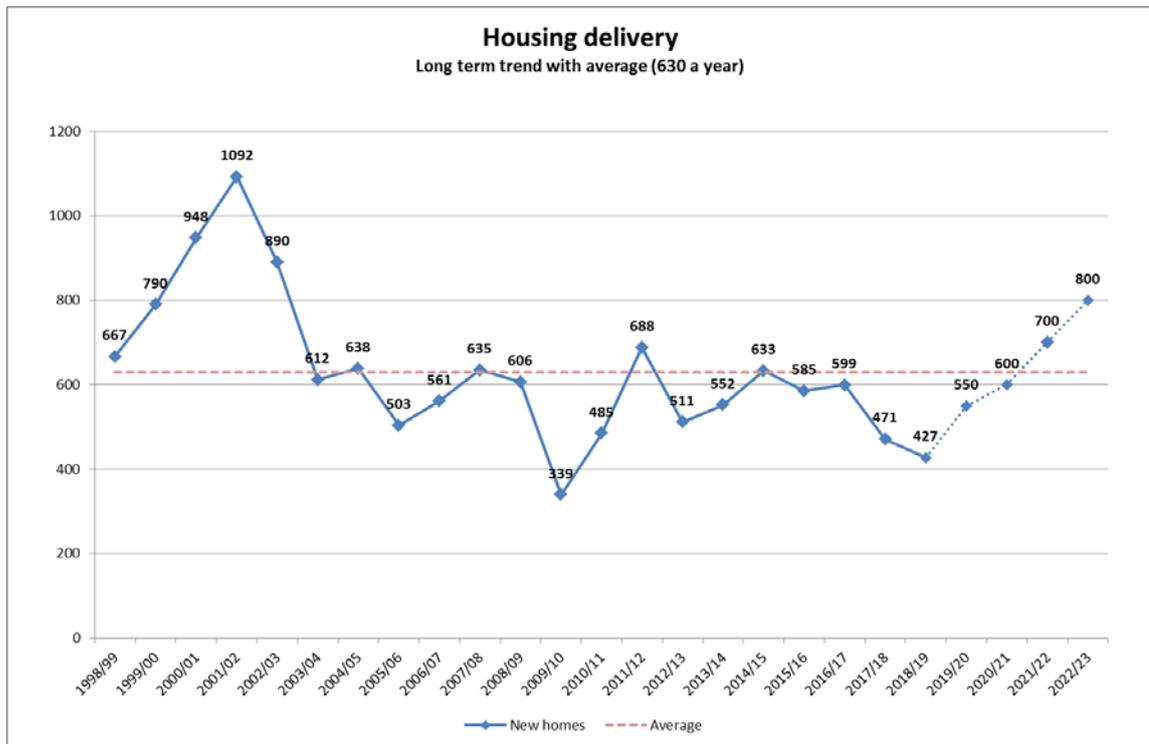
59. The refreshed study will produce a single table presenting the variables and assumptions applied in the previous studies and set out all the changes that need to be applied. The evidence base also examines the actual rate of delivered affordable housing compared to the Council's policy position; this provides a good indication of the extent and scale of derived benefit arising from contesting viability.
60. The study presents the findings from appraising twenty-seven sites: these are the site typologies, selected to represent the pool of sites located across Rotherham's six housing market areas. The Council has identified and allocated these sites in its recently adopted Local Plan. Sixteen of these sites are greenfield and eleven are brownfield sites.
61. All of 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.
62. 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 recently adopted Local Plan has allocated substantial greenfield (formerly Green Belt) housing sites.
63. However, this cannot be said for the vast majority of brownfield sites, many of which (although not all) are in council ownership and have been allocated in the Local Plan for residential development. The appraisals demonstrate that many of these kinds of sites may incur difficulties in getting built out in the future, as many have been derelict or vacant and remain undeveloped for at least the last decade.
64. Their continuing inclusion in the adopted Local Plan in meeting the planning authority's future housing supply and delivery targets will need to 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; the planning authority will need to be receptive to, not only market conditions, but how other complementary actions might help deliver development on these kinds of sites in the future.
65. A number of selected 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 that these sites remain derelict and undeveloped is testament to their predicament, namely that 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.
66. In summary, the study appraisals reveal that despite changes in the overall market conditions relating to the recovery in house prices as well as increases in build costs, on balance these changes have not materially improved the present position of several of the brownfield sites.
67. From this 2019 study of viability of twenty seven site typologies, it is clear to the Council that the development industry, are themselves delaying progress on some submitted planning applications when contesting or challenging viability of sites to deliver affordable housing requirements on site. It is clear from the evidence presented in the refreshed study, that all greenfield sites can meet full policy requirements, whilst some of the brownfield sites will not be able to achieve this given the unique problems and/or situation of the site.

### **Summary of Overall Root Cause Analysis**

68. Summary of the new homes position (at August 2019):
- 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.
  - 6,000 new homes allocated are on greenfield sites.
  - Of the 85 allocated sites, 17 sites are estimated to have capacity for around 100 dwellings.
  - Around 3,000 homes are in the pipeline for development:
    - Planning permission has been granted on 9 Local Plan sites totalling 717 new homes.
    - Five sites are currently pending decision as the issues are worked through in negotiation with the landowner/developer. Once granted, this will add a further 884 dwellings with planning permission in the coming months.
    - Pre-application advice has been provided for schemes that could deliver a further 1,364 new homes.

**Figure 2: Housing delivery 1998/99 to 2018/19 (actual) and 2019/20 to 2022/23 (projected)**



69. The long term average of housing delivery in Rotherham since the adoption of the Unitary Development Plan in 1999 is 630 new homes per annum. It is noted that long before the downturn in the housing market, delivery in Rotherham was falling.
70. This fall in delivery rates was in part due to national guidance introduced via Planning Policy Guidance 3 which promoted a brownfield first strategy and required sequential testing of greenfield sites before they could be released for development. Subsequently Rotherham introduced a Greenfield Moratorium preventing the release of any remaining allocated greenfield housing sites. Along with the time required to prepare a new Development Plan for the Borough within the changing national context of new LDFs, increasing regional spatial strategy targets which were then revoked, and finally Local Plans, and reducing resources for planning services, this inevitably led to a decline in housing completions below the average delivery rate of 630 new homes per annum. This position should now improve with the adoption of the new Local Plan.
71. 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 infrastructure costs, 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.

## **Key delivery issues**

72. Prior to the adoption of a new 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.
73. 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, with more pending, and build rates are expected to improve.
74. 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 funding sources.

## **Challenges**

75. 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.
76. 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 etc. These conditions will be essential to ensure a robust pipeline of saleable properties and affordable housing secured through S106 obligations, alongside supporting services and community facilities.
77. 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.
78. An analysis of Planning Service performance data reveals there are no significant issues delaying the granting of planning permission and that planning

applications are being 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. 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 the majority of planning appeal decisions were made in the Council's favour. This demonstrates the soundness of decision making by the Planning Service.

### ***Problems***

79. Under-delivery of allocated sites and slower delivery on site below the pace anticipated in determining the five year housing supply, could lead to planning by appeal and the application of the "tilted balance" by the Planning Inspectorate on appeal. This may also mean development proceeding in unsustainable locations or on land locally valued by communities.

### ***Weaknesses***

80. 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 issues.

### **Summary**

81. The main reason for Rotherham's HDT result is the very low housing completions in the financial year 2017/18. This is predominantly due to the length of time taken to prepare a robust Local Plan to meet Government requirements, including a Borough-wide Green Belt Review; and the time-lag from adoption of the Local Plan to new housing sites coming through the planning system, gaining planning permission and building starting on site. Wider market conditions and developer confidence are also significant factors.
82. The Council will work corporately and collaboratively with other organisations to assist in resolving issues where feasible 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.
83. The Council is making every effort to remedy shortfalls in housing delivery, and through the adoption of its Local Plan and release of a number of large greenfield sites it can clearly demonstrate a five year supply of housing land. During the Local Plan examination, landowners, developer's and their representatives, clearly supported bringing forward their sites for development as soon as possible after adoption of the plan.

### **3. Key actions and responses**

84. 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.
85. The table in Appendix 1 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 need to provide additional affordable social rented and shared housing to meet identified needs; promote developer and buyer confidence; and to increase the overall supply of new homes in the Borough.
86. 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 already taking**

##### **1. 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 is anticipated later in 2019. 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 “Conducting Site Based Development Appraisals: Contesting Viability” Supplementary Planning Documents (SPDs). These two SPDs will provide greater clarity to the house building industry regarding the requirements for affordable housing and other S106 planning obligations and assist developers in their planning application submissions and enable the Council to robustly defend its planning policy requirements.

##### **2. 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 shall 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 is required to have a realistic understanding of the costs and values associated with bringing land forward for development and including an understanding of realistic residual land values and profit levels whilst factoring in the requirements and obligations of Local Plan policy. The Council need to have 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 should be factored into work programmes; to ensure key concerns are highlighted early in the process and solutions can be sought and problems resolved.
- Housing delivery objectives underpinning the adopted Local Plan will depend on having sufficiently de-risked suitable sites that are viable and meet demand for market and affordable housing.
- 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:
  - Granted planning permission for over 700 new homes on allocated housing sites since the Sites and Policies Document was adopted.
  - Determine applications for a further 900 new homes in the coming months.
  - Promote the Council's pre-application service to ensure delivery of Local Plan policy compliant and high-quality schemes on site allocations.
  - Working to deliver the Bassingthorpe Farm Strategic Allocation in the longer term, through joint working with the majority landowner, Fitzwilliam (Wentworth) Estates. A masterplan and supporting evidence base studies have been prepared, funded through Homes England Capacity Funds.

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

### **1. Bringing forward inactive sites**

- The Council will work with land owners 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 team has identified inactive sites using data gathered from a variety of sources including the Brownfield Land Register, sites within the Local Plan, sites where developments have not commenced and planning permission has expired and discussions with landowners, developers and Members.

- A pipeline for intervention opportunities has been created using a scoring matrix to determine the priority for each site. A casework system is established whereby each site will have a dedicated “passport” which contains all supplementary information and any communication relating to the site.
- A site assessment template has been prepared to record standardised information for all sites (planning reference, visuals from site visits; contact information and date and brief details when initial contact is made). In future an accompanying progress log will be used to record any actions regarding the site. Pulling all this together; the Service has developed an intervention toolkit which will be used as a way of engaging and supporting landowners and developers in bringing their sites forward.
- In the future, the Council along with developers/landowners working with strategic infrastructure providers will continue to work closely with one another to deliver growth, provide strategic infrastructure and meet other policy requirements in as cost-efficient way as possible. Suggestions include:
  - A need for flexibility to allow for staged developer contribution payments, especially for sites experiencing marginal viability issues.
  - Lower levels of affordable housing on site, where viability levels are such that to require affordable housing provision would render the site undeliverable.
  - Public sector support to bring forward sustainable vacant brownfield sites forward for development within existing communities and close to services and facilities.

### **Funding support from other agencies**

- Collaborating with Homes England to unlock funding to promote delivery, through capacity funding and accelerated construction funds.
- Seeking public sector grant funding to provide site/ strategic infrastructure/ essential utilities infrastructure to enable development opportunities to proceed.
- Assessment and the investigation of mechanisms to help forward fund critical infrastructure using various local authority powers and policy trade-offs (e.g. Public Works Loan Board (PWLB) funding sources; RMBC and other Council partners).

### **Consultation with the development industry**

87. 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. The action plan will be shared at the Developer Forum.

### **Promoting development opportunities to housing developers**

88. The Council's Strategic Housing and Development Service organises the annual Housing Developer Summit and proposes more frequent developer forums. It is through this forum that some of the identified issues and areas of concern will be discussed. The next major forum is scheduled for early December 2019. Officers will build on this annual meeting and are proposing to meet more frequently in targeted developer forums throughout the year, enabling the promotion of sites and providing improved access to key officers within the Council who can facilitate development.
- Marketing housing development opportunities in Rotherham, through the annual Housing Developer Summit, other regular key events and forums and an improved website.
  - Releasing Council owned land for development with partners to meet specified needs in geographic-specific locations to build investor confidence in that locality and attract other private sector developers into the area.

### **Rotherham Strategic Housing Team - programme of activity**

89. 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 is currently building 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. Below is a summary of some of the key activities currently underway:
- **Site Clusters Programme: Building 217 homes in partnership with Wates**  
Seven sites across the borough have been 'clustered' to allow cross-subsidisation between higher and lower value sites (all in areas where council housing is in high demand), with the effect of doubling the number of homes that would otherwise have been built. Ninety eight houses for council rent including some specialist accommodation (for young people, older people and people with autism), 83 homes for open market sale and 36 for shared ownership. Approximately one third of new dwellings are now completed and available for occupation, with all due to be completed by summer 2020.

- The Bellows: Building 58 homes in partnership with Houltons**  
 A formerly derelict shopping centre has been converted into 58 high quality homes. Thirty will be for shared ownership and 28 for council rent. The first homes will be ready in August 2019 with all due to be completed by the end of year.
- Rothwell Grange: Building 44 homes in partnership with Esh**  
 A decommissioned care home, demolished and to be replaced with 44 high quality houses, bungalows and apartments. Twenty homes will be for shared ownership and 24 for council rent. The first homes will be ready September 2020 with all due to be completed early 2021.
- Rotherham Town Centre**  
 Plans to build 185 homes to support the regeneration of Rotherham Town Centre, complementing the Council's major investment into Forge Island where a cinema, hotel, bars and restaurants, are to be presented to the Council's Cabinet in September 2019. Subject to approval, work will commence in early 2020 and the homes will be completed by March 2022. The following is the mix of housing units to be provided on site:

Site Name	Planning Status	Market Sale Housing*	Council Rented Housing*	Shared Ownership*
A vacant site, currently used as a car park on Sheffield Road, Rotherham	Pre-Application discussions	34 homes	44 homes	
Former Millfold House and land to rear on Westgate, Rotherham: current users are to be re-located.	Planning application Submitted: RB2019/10 36	14 homes	39 homes	
A former car dealership 'Henleys', now vacant at Wellgate, Rotherham	Planning application Submitted: RB2019/10 35		31 homes	23 homes

\* Currently anticipated number of new homes, but until permission granted the number of units to be delivered should be considered as a guide only.

As already noted, this activity is currently ongoing.

- Consideration of new and innovative mechanisms to help deliver affordable housing requirements off-site (e.g. with modern methods of construction (MMC)).

## 4. Project management and monitoring arrangements

90. In addition to current monitoring of housing completions and commitments, consideration shall be given to implementing a programme of structured and focused monitoring subject to resource availability, including:
- New build house price transactions – annually/bi-annually and using Hometrack and ONS datasets. Monitoring of locally completed scheme details will also be considered.
  - Building prices and costs – annually/bi-annually –from BCIS.
  - Monitoring affordable housing delivery via S106 Planning Obligations and other actions undertaken by the council and registered providers.
  - Collating results from independent viability appraisals.
  - Monitoring delivery of house types, mix and sizes - consideration will be given to collating and using data collected via Energy Performance Certificates.
  - Regular follow-up surveys on recently completed development schemes focusing on occupier surveys.
  - CIL monitoring and the preparation and updating of CIL Infrastructure Funding Statements.
  - Monitoring of S106 planning obligations.
  - A strategic infrastructure delivery protocol developed and monitored to ensure delivery of key strategic infrastructure.
91. It is essential that new monitoring requirements complement other annual monitoring activities regarding housing land supply position statement and the Annual Monitoring Report.
92. 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 1: Summary of strategic housing activity

It is important to note that whilst development is already ongoing on some of these sites; some of these sites are aspirational and do not have planning permission granted at this stage.

**Table 6: Current Council Delivery**

Scheme	Site Name	Area	Ward	Homes
Clusters	Braithwell Road	Maltby	Maltby	98
Clusters	Conway Crescent	East Herringthorpe	Rotherham East	14
Clusters	Farnworth Road	East Herringthorpe	Rotherham East	16
Clusters	Rother View Road	Canklow	Boston Castle	80
Clusters	Shakespeare Drive	Dinnington	Dinnington	5
SOAHP*	Bellows Road	Rawmarsh	Rawmarsh	58
SOAHP	Rothwell Grange	Broom Valley	Boston Castle	44
SOAHP Bungalows	Braithwell Road	Ravenfield	Silverwood	5
SOAHP Bungalows	Princess Street	West Melton	Wath	4
SOAHP Bungalows	Arundel Avenue	Treeton	Rother Vale	5
SOAHP Bungalows	TBC	TBC	TBC	1
MMC** Bungalows	Symonds Avenue	Rawmarsh	Rawmarsh	7
MMC Bungalows	Hounsfeld Crescent	East Herringthorpe	Rotherham East	2
MMC Bungalows	Hounsfeld Road	East Herringthorpe	Rotherham East	2
Town Centre	Sheffield Road	Sheffield Road	Boston Castle	78
Town Centre	Millfold House	Westgate	Boston Castle	53
Town Centre	Henley's Garage	Wellgate	Boston Castle	54
S106	Queens Avenue	Kiveton Park	Wales	12
S106	Penny Piece Lane	North Anston	Anston & Woodsetts	6
<b>TOTAL</b>				<b>544</b>

\*SOAHP Shared Ownership and Affordable Housing Programme

\*\*MMC Modern Methods of Construction

**Table 7: Council Enabled Delivery**

Scheme	Site Name	Area	Ward	Homes
Land Sale	Dalton Lane	Dalton	Valley	155
Land Sale	Chesterhill Avenue	Dalton	Valley	163
Land Sale	Whinney Hill	Thrybergh	Valley	75
Land Transfer	Hornbeam Road	Wickersley	Wickersley	2
Land Transfer	Greenwood Crescent	Wickersley	Wickersley	2
Land Transfer	Craig Walk	Wickersley	Wickersley	2
Land Transfer	Chestnut Close (adj 7 & 9)	Wickersley	Wickersley	2
Land Transfer	Chestnut Close (opp 30 & 32)	Wickersley	Wickersley	2
Land Transfer	Oak Close	Wickersley	Wickersley	2
Land Sale	Warden Street	Canklow	Boston Castle	46
Land Sale	Swinton Town Centre	Swinton	Swinton	80
Land Sale	York Road	Eastwood	Boston Castle	30
Land Sale	Fenton Road	Kimberworth	Rotherham West	90
Land Sale	Netherfield Court	Eastwood	Rotherham East	30
Land Sale	Copeland Lodge	Thurcroft	Rother Valley	50
<b>TOTAL</b>				<b>731</b>

## Appendix 2: Inactive sites / sites where there has been little / no activity.

Local Plan Reference	Address	Brownfield Greenfield	Council owned?	Estimated capacity	Commentary
H40	Land to east of Cortonwood Business Park	Brownfield	No	122	<p>Planning permission (2008/1326) granted 02/11/2010 and the subsequent discharge of planning conditions to ensure extant. However no progress in developing this site since the discharge of planning conditions. An awkwardly shaped site with only one access. Access to north-east is permitted but this may be difficult to achieve.</p> <p>Discussions with the developer reveal that they are interested in submitting a new planning application to develop out this site. The developer did not participate in the Examination into the Local Plan.</p>
H31	Chesterhill Avenue, Thrybergh	Brownfield	Yes	148	Site cleared as part of Housing Market Renewal Programme and has been vacant for at least seven years. Located in a low market value area. The Council is seeking to sell this land on the open market. Pre-application advice has recently been sought.
H32	Land at Whinney Hill, Thrybergh	Brownfield	Yes	75	Site cleared as part of Housing Market Renewal Programme and has been vacant for at least seven years. Located in a low value area. The Council is seeking to sell this land on open market. Pre-application advice has recently been sought.
H99	Land off Rotherham Road Maltby	Greenfield	No	84	The applicant sought B1 light industrial development a number of years ago. Subsequently successfully achieved planning permission RB2016/0268 granted 24/05/2017; to change the approved B1 office blocks to residential. However viability issues cited in bringing this site forward for development. This is well-located site between Hellaby and Maltby with good views over the adjacent Green Belt. A more traditional housing scheme may not achieve the capacity identified in the Local Plan.
H68	Tarmac site off Blyth Road, Maltby	Brownfield	No	23	A small site with a listed building within the grounds. Used by Tarmac as offices. Redevelopment impacts on the historic environment and existing user on site are reasons why this scheme has not come forward earlier.
H75	Timber Yard at Dinnington	Brownfield	No	271	A former timber yard, where partial demolition has taken place. The site is becoming an eyesore. Despite efforts by the Council, this site has not been built out. The landowner bought at a high point in the economic market and is reportedly reluctant to sell at current market values.
H80	Part of the Silverdales housing allocation	Brownfield	No	131*	The Silverdales part of this allocation is brownfield and was identified as a small site in the Unitary Development Plan. The land is in a low market value area and is in multiple ownerships. The Council has continued the residential allocation of this land along with former Green Belt land (used as recreational and sporting facilities) to the

					<p>east but in a single ownership by CISWO (Coal Industry Social Welfare Organisation).</p> <p>The Council anticipated that by allocating a larger mixed site in the Local Plan this would “kick start” its potential re-development. Despite efforts by the Council, this site has proven difficult to bring forward for development.</p> <p>Sport England requires compensation for the loss of any previous sporting facilities on the remainder of the site (land in CISWO ownership), whether through on or off-site provision.</p>
H83	land between Sheffield Road and the mineral railway)	Brownfield	No	30	<p>Planning permission has been previously granted for residential development on site; however the office block on site is currently in use for computing facilities and children’s play facilities and leisure attraction. The landowner does not appear to have an interest in bringing forward the remainder of the hard standing for residential development. The site is in close proximity to the A57 - a former trunk road linking Sheffield to the east (A1) and Lincolnshire and at the bottom of the railway cutting on the northern boundary. There are potential overland surface flooding issues to be dealt with on site.</p>
H94	North Farm Close, Harthill	Brownfield	No	40	<p>A previous planning permission was commenced and development of residential units undertaken on site. However the site was subsequently abandoned. At the time of Local Plan preparation the site was extended into the green belt, following discussion with the landowner and agent/ planning consultant; in the belief that this would “kick start” the redevelopment of this site in an attractive village location, for residential development. This has not happened and the site remains abandoned. The built properties need to be demolished as they cannot reach modern building regulations, thus adding further costs to the re-development of the scheme.</p>
H86	Land at jct. of Main street and Rotherham Road, Swallownest	Green Space	Yes	15	<p>A small attractive site in Council ownership with landscaping and planting. The council will seek to sell this site for residential development but no progress so far. This is typical of a number of small sites in council ownership within the built environment that can be sold on the open market and brought forward for development.</p>
<b>Total estimated number of dwellings</b>				<b>939</b>	<p>This is only an estimate of the likely potential number of units that could be brought forward.</p>

\* Total capacity of the allocation including the former sporting and recreational facilities.

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