

**Title:** Options for Boosting the Supply of Housing Land

**Lead Officer:** Graham Nelson, Interim Local Plans Manager

**Portfolio Holder/  
Lead Member:** Councillor G Cowcher

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### **Summary**

This report investigates various possible options that could be pursued to boost the levels of deliverable housing land supply. Whilst work on this matter has been progressing, it has recently come to a head following the publication of a planning appeal decision which concluded that Stratford-on-Avon District Council (SDC) could no longer demonstrate a 5-year supply of deliverable housing land in accordance with the National Planning Policy Framework (NPPF).

This report sets out the background to the current situation; explains the potential significant implications of not having a demonstrable 5-year supply of deliverable housing land; looks at possible policy and local plan implications; reminds Members of the critical need to increase supply by granting planning applications; considers further options for identifying more sites for housing that may lead to delivery in the short to medium term; and examines possible measures to speed delivery of the existing identified housing pipeline.

The report goes on to:

- identify a series of possible measures that could be included within an Action Plan to address the matter (referenced as AP1-15);
- ask for members to express a view on whether they want officers to pursue these possible measures further; and
- seek endorsement for proposed arrangements for reporting on the development and delivery of the Action Plan.

### **Recommendations:**

- (1) That the potential significant implications of being unable to demonstrate a 5-year supply of deliverable housing land, be noted;**
  - (2) That any possible Action Plan measures which The Cabinet do not wish to be pursued further at this stage be identified;**
  - (3) That the Head of Development, in consultation with the Portfolio Holder for Planning and Economic Development, be delegated to pursue work in relation to the other possible Action Plan measures;**
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- (4) That a Member Advisory Group, reporting to The Cabinet, be established by the Leader of the Council to assist with the delivery and monitoring of the Action Plan; and**
  - (5) That a further report on the progress to re-establishing a 5-year housing land supply be received by The Cabinet by March 2026.**
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## **1 Background/Information**

- 1.1 Over the second half of 2024 the Government made a number of significant changes to the planning system in England aimed at supporting its stated commitment to deliver 1.5 million new homes over the life of the current parliament.
- 1.2 In December 2024, it published an updated version of the National Planning Policy Framework (NPPF). Alongside this it also revised the national methodology which is required to be used to calculate the number of homes that local planning authorities are required to plan for and ensure are built. This figure was previously known as Objectively Assessed Need (OAN) and is now known as Local Housing Need (LHN).
- 1.3 The change to the standard method had the effect of increasing housing need significantly over much of rural England. Stratford-on-Avon District was no exception. The methodology that had been required to be used prior to December 2024 calculated the district's housing need as 553<sup>1</sup> dwellings per annum (dpa). The December 2024 LHN methodology resulted in the district's housing need being calculated as 1,126 dpa, an increase of over 100%.
- 1.4 The District's Core Strategy was adopted in July 2016 and seeks to guide development over the period up to 2031. There is a requirement to consider whether adopted plans remain up to date every 5 years. This assessment was endorsed by Council at its meeting on 19 April 2021 and concluded that the plan remained up to date. It noted that the adopted plan sought to deliver a level of housing in excess of the then LHN delivery rates were comfortably in excess of targets and a land supply of more than 5 years could readily be demonstrated. However, the publication of the NPPF and the significance difference between the needs the Core Strategy is seeking to meet and the LHN mean that it is difficult to argue the housing policies in the Core Strategy remain up to date.
- 1.5 The Council updated its 2024 housing land supply position in June 2025 to take account of the new NPPF and associated changes. Updates to the land supply position are required regularly and the practice in Stratford is to publish these annually (since adoption of the Core Strategy updates had shown supply to be well in excess of the 5-year requirement). The June 2025 update could only demonstrate the equivalent of 5.06 years' worth of land supply.

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<sup>1</sup> [Turley and LPDF - The standard method of assessing housing need \(March 2024\)](#) - Page 8. This figure was the LHN for Stratford at March 2024 which, notwithstanding the higher Core Strategy requirement of 730dpa, was relevant for the 5 year period 2024-2029

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- 1.6 The approach to calculating this figure was challenged at a recent planning appeal at Bordon Hill, south west of Stratford-upon-Avon. The appeal considered issues including: a) the methodology that the Council had used to calculate the level of housing need; and b) whether the oversupply accrued against the Core Strategy requirement could be counted against the future LHN requirement and c) whether some of the housing supply that had been identified by the Council met the NPPF definition of being “deliverable” within the five year period.
- 1.7 The appeal decision was published on 3 September 2025. It concluded that *“Based on my conclusions regarding the housing requirement, the supply would be 2.74 years .... and the shortfall would be around 2,285 dwellings .... In summary, the Council cannot demonstrate a 5 year housing land supply.”*

This was based on an assessment that:

- accepted the Council’s case that the housing need to be addressed in year 1 of the 5-year period could continue to be calculated by reference to the Core Strategy rather than the December 2024 LHN as the first year of the 5-year period mostly pre-dated the publication of the higher figures;
  - only partially accepted the Councils’ case that previous oversupply of housing in relation to the Core Strategy could effectively be counted towards housing need. The inspector opined this was reasonable in the first year of the five-year period but not throughout, therefore reducing the overall impact of this by 80%; and
  - largely accepted that appellants’ contention that some of the identified housing supply pipeline did not meet the government definition of deliverable (see para 1.10.1 below for further detail on this) and so shouldn’t be included in the supply figure.
- 1.8 An initial review of the appeal decision has been undertaken and whilst disappointing, it is not considered to be challengeable. As a result, the Council has little option but to accept that it can only demonstrate a 2.74 year supply of deliverable housing land and its website has been updated accordingly.
- 1.9 ***Implications of not being able to demonstrate adequate housing land supply***
- 1.9.1 The impact of only being able to demonstrate a 2.74 year supply of housing land is significant and immediate. Whilst the Core Strategy remains part of the adopted development plan for the area and regard must be had to it in determining planning applications, the absence of a 5-year supply means that plan policies considered the most important for determining planning applications for housing need to be considered as out of date and, in accordance with para 11 of the NPPF, planning permission should be granted unless the site is in a protected area, such as vulnerable to flood risk or important habitat, or the adverse impact would significantly and demonstrably outweigh the benefits of development. This is known as the *“Presumption in favour of Sustainable Development”* or sometimes *“the tilted balance”*.
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1.9.2 In practice this means that the Council is likely to receive a significant number of speculative planning applications for housing on land that is outside identified settlement or Built-Up Area boundaries and not allocated for residential purposes in the Core Strategy or any Neighbourhood Development Plans. This process has already started with a number of planning applications being submitted in recent months. Areas adjacent to existing settlements outside of the AONB and Green Belt would be particularly vulnerable. As would areas within the Green Belt adjacent to existing settlements which also meet the criteria for being considered as grey belt<sup>2</sup> sites.

1.9.3 An example of the practical implications of this can be seen in the Bordon Hill appeal decision itself. In this decision the inspector noted, among other things, that the proposed development would:

- *"not be in a suitable location having regard to the development plan and the conflict with CS Policies CS.15 and AS.10 and NDP Policy H1."* [para 99]
- *"cause moderate harm to the character and appearance of the surrounding area. There would be conflict with CS Policies CS.5, CS.9, CS.15 and AS.10 and NDP Policies BE1, BE2 and BE6"* [para 100]
- *"also result in minor adverse effects on the setting and significance of Anne Hathaway's Cottage (the Grade I listed building and the Grade II registered park and garden) and Shottery Conservation Area with a low level of less than substantial harm."* [para 100]

1.9.4 However, he went on to conclude in relation to the overall planning balance that:

*"The proposed development would provide benefits that carry significant weight in terms of the delivery of market and affordable housing and biodiversity net gain. .... The adverse impacts in terms of locational suitability, character and appearance, and designated heritage assets, and the associated policy conflicts, carry no more than moderate weight."* [para 107]

*"The adverse impacts of the development would not significantly and demonstrably outweigh the benefits when assessed against the NPPF policies taken as whole, including those which promote sustainable locations and the provision of affordable homes. Consequently, the presumption in favour of sustainable development would apply in line with NPPF paragraph 11(d). Therefore, despite the conflict with CS Policies CS.5, CS.9, CS.15 and AS.10 and NDP Policies H1, BE1, BE2 and BE6, there are sufficient material considerations to indicate that planning permission should be granted in this instance."* [para 108]

1.9.5 This is illustrative of how the tilted balance works in practice and how in an individual case the weight attached to different issues in striking the planning balance is altered. However, members should also be cognisant that in addition to impacts of the individual sites that may be approved there is also likely to be a cumulative impact with a potential significant number of relatively small-scale sites being approved. The provision of an

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<sup>2</sup> See Grey Belt definition in [Annex 2 – Glossary of NPPF](#) (page 73)

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increasing proportion of development through smaller sites will tend to produce a lesser level of contribution to support critical infrastructure, such as affordable housing, transport improvements and educational and community facilities than would the same level of development provided on strategic scale sites.

#### 1.10 **Possible response to the situation**

1.10.1 There are several possible responses to the circumstances that the District finds itself in. First and foremost, the Council needs to significantly and quickly increase the supply of homes, and the primary means to achieve this is through the granting of planning permissions for residential development.

1.10.2 In parallel, the Council needs to continue to progress its Local Plan to ensure that it can regain a plan-led approach to development in Stratford-on-Avon District. It is only through maintaining an up-to-date Local Plan providing sufficient sites to meet LHN that the Council will be able to retain effective control of the planning system.

1.10.3 In doing both of these matters, it is necessary to consider the definition of deliverable that it set out in the NPPF, as sites must meet this definition to be able to be counted towards the supply available in the 5-year period. This is found on page 72 of the NPPF and is set out in full below:

***"Deliverable:*** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."*

1.10.4 Major development is defined elsewhere in the NPPF and for housing, development it is "*where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more*". This definition is significant as it means on allocations and outline consent the onus is on the Council to provide clear evidence of deliverability when the Council is not in control of this. Furthermore, even where detailed consents have been issued they can easily be excluded from the land supply where sites stall.

1.10.5 The NPPF stresses the importance of a plan-led planning system. The Council is progressing with a new local plan as required and encouraged to do by the Government, it is unfortunate that changes to the housing numbers nationally have cut across this work and come into force ahead of the new plan, undermining somewhat the Government's support for a plan-led system.

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- 1.10.6 Whilst it is important that the Council continues to progress the South Warwickshire Local Plan (SWLP) at pace in partnership with Warwick District Council to bring forward new strategic growth locations and plan properly for the long term needs of the two Districts in a positive way. This will not in practice, provide any relief from the pressures associated with the absence of a 5-year housing land supply in the short-term prior to adoption of the SWLP.
- 1.10.7 Furthermore, Members should note that at present, whether a site is or isn't referred to in either the emerging SWLP or the draft Site Allocations Plan is largely irrelevant for the purposes of determining planning applications and certainly cannot be relied on as a potential ground for refusal. Indeed, Para 51 of the NPPF notes *"Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination... Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process."* In other words, just because a site comes forward earlier than desired, is not in itself, grounds for refusal.
- 1.10.8 So in conclusion, whilst continuing to drive forward work on the SWLP remains necessary, it is unlikely to contribute significantly towards creating land supply in the next two years so further measures will be necessary if the Council wishes to regain effective control of planning system in the interim period.
- 1.10.9 SDC is not alone in being unable to demonstrate a 5-year housing land supply, particularly following publication of the new standard method in December 2024. In April of this year, it was reported in Planning Magazine that 50% of all English Local Planning Authorities had less than 5 years supply. Indeed, the Council is in a better position than many authorities facing the same situation insofar that its Core Strategy has been successful in identifying sites that have been delivered, and this has resulted in high and sustained levels of delivery.
- 1.10.10 Over the past 9 years for which housing completions are available (2015/15-2023/24) the average net rate of housing completions has been 1,229 dwellings per year. It should be noted that this figure includes 2020/21 when delivery levels were impacted by covid and if this is removed from the figures the average delivery rates increase to 1,289 dwellings per year.
- 1.10.11 This provides some comfort that should more sites be identified the planning process that the market will be able to build them out. It also significantly reduces the risks that may be posed by the Housing Delivery Test (HDT). The HDT assesses housing delivery over time against local housing needs. Authorities failing it can face a presumption in favour of sustainable development, an increased buffer needing to be applied to housing needs, or in extreme circumstances government intervention in their planning activities. The current HDT figure for Stratford-on-Avon was published in December 2024 and was 254%. This was based on housing need calculated using the previous version of the standard method but even with the new methodology applied it should be possible
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to keep delivery levels up to a level where no buffer or other sanction should be applicable.

1.10.12 However, notwithstanding this, there is merit in looking at best practice from elsewhere. Cornwall Council has published an interim policy position statement<sup>3</sup> to assist decision making under the 'Presumption in Favour of Sustainable Development' which sets out:

- Which policies they think are out of date and which ones can still be used
- How their policies reflect national policies
- How they will make positive planning decisions
- Their principles for development
- Information about a new local plan

1.10.13 It is suggested that SDC could usefully produce a similar document to provide clarity to planning colleagues, Members, applicants and residents regarding the determination of planning applications. It would be particularly helpful in assessing where individual Neighbourhood Development Plans may still be considered up to date. Such a document is likely to need to be subject to consultation in order to carry weight.

**[AP1]**

1.11 ***Initial options for identifying more sites for housing that may lead to delivery in the short to medium term***

1.11.1 In considering the response to not being able to demonstrate a 5-year housing land supply a number of possible options that have been identified that may assist in increasing the supply of demonstrably deliverable sites in the period up to the adoption of the new SWLP. These options fall within 4 categories:

- a) Sites that may meet the definition of deliverable and could be included within the supply despite not yet having planning consent
- b) Sites that have been granted planning consent and may meet the definition of deliverable
- c) Measures which may be taken to speed-up the delivery of sites once identified
- d) Changes to supply assumptions.

1.11.2 To assist with consideration of each of the possible measures, a summary assessment has been provided for each measure which considers:

- The level of **contribution** that the measure may make to closing the gap between current land supply and the 5-year target of a minimum of 2,285 homes. Though it should be noted that this gap is not fixed and the target will change over time as affordability changes. Additionally future calculation of housing needs will need to be based on the LHN for the entirety of the 5 year period and this will have the effect of increasing the gap. It is not possible to quantify a precise level of additional supply that will be sufficient to regain a 5 year supply but this may be in the region of 3,500-4,000 homes. The

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<sup>3</sup> Cornwall County Council [`Interim Policy Position Statement`](#)

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possible level of contribution of measures have either been quantified or, where this is not possible, categorised as:

- minimal (likely to provide less than 50 homes in the 5-year period)
  - meaningful (likely to provide between 50 homes and 150 homes in the 5-year period);
  - high (likely to provide between 150 and 500 homes in the 5-year period), and
  - very high (likely to provide more than 500 homes in the 5-year period).
- The level of **resource** that is likely to be needed to be expended in order to deliver the measure.
  - The **timeframe** that each measure may typically take before it makes a positive contribution towards published land supply figures:
    - short (up to 6 months)
    - medium (6 months to a year)
    - long (over a year).

1.11.3 The measures under each category are considered in Section 3 below. In some cases work is still currently underway and it is not possible to estimate categories.

## **2 Options available to The Cabinet**

2.1 Option 1 – to agree to prepare an action plan in order to address the issue and to seek to demonstrate a 5-year supply within the quickest possible timetable. Identifying any possible action plan measures where further work is not to be done at this time.

2.2 Option 2 – to not agree to the preparation of an action plan.

## **3 Evidence Base**

### **3.1 (a) Sites that may be included within the 5 year supply**

#### **3.1.1 Neighbourhood Plan Allocations [AP2]**

3.1.1.1 The Localism Act introduced Neighbourhood Planning in 2011. The role of the Neighbourhood Development Plan (NDP) is to identify opportunities for future development and future use of land as well as establishing a vision and planning policies for its area. Once adopted, the NDP becomes part of the Development Plan for the relevant parish area. There are a total of 32 'made' NDPs in the District. Further work will be needed as part of AP1 to establish whether these remain up to date.

3.1.1.2 Out of these, there are currently 7 plans that contain a total of 9 allocated and/or reserve housing sites indicating that they will be considered suitable for housing should a five-year supply not be demonstrated.

3.1.1.3 An initial desktop assessment of the potential deliverability of these sites has been conducted and is set out in Table 1 below. It uses a simple green, amber, red classification. Green being sites considered likely to be deliverable if owners are willing to take forward, subject to preparation of

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evidence. Amber being sites considered possible to be deliverable if owners are willing to take forward although with one or more known constraint that requires further investigation. Red being sites considered unlikely to contribute to land supply in the next 5 years.

- 3.1.1.4 This suggests that some of the sites could be considered potentially deliverable and could therefore be included within the 5-year supply, given that these sites form part of the adopted Development Plan, should sufficient evidence be available to support their deliverability. However, this analysis is draft and further work is required by officers to engage with owners/promoters to assess deliverability.

**Table 1 - NDP Sites – Initial desktop assessment**

<b>Site Name/NDP Reference</b>	<b>Indicative Dwelling Capacity - working assumption</b>	<b>Number of Units that could be Deliverable within 5 years from April 25</b>
HSG5 – South of Oldbutt Road, Shipston-on-Stour	34	34
SCB.6 - Land on the east side of Long Marston Road, Long Marston	10	10
QUIN.A - Land on the east side of Goose Lane, Quinton	30	30
TYS.A - Land at Herbert's Farm, Tysoe	16	16
WELL.A - East of Warwick Road, Wellesbourne	25	25
CLIF.A - East of Campden Road, Clifford Chambers	25	25
ILM.A - Land at Mabel's Farm, Ilmington	8	8
WELL.C - North of Moreton Morrell Road, Wellesbourne*	300	120
WELL.B - East of Kineton Road, Wellesbourne	67	67
Total number of dwellings that could be deliverable in 5 years (green sites only)	115	115
Total number of dwellings that could be deliverable in 5 years (green and amber sites only)	448	268

Note\* is pending appeal and further info re archaeological situation.

Contribution	Resource	Timeframe
115 - 448	Low	Short

### 3.1.2 *Sites within the Draft Site Allocations Plan [AP3]*

- 3.1.2.1 The Site Allocations Plan (SAP) is a document intended to assist in guiding where and how potential developments will be built prepared pursuant to the Core Strategy. The intention was for it to sit alongside the Core Strategy and once adopted would become part of the Development Plan for Stratford-on-Avon District. The current Local Development Scheme (LDS) notes the possibility that this plan will not be progressed as a standalone plan but instead smaller scale allocations may be included within the emerging SWLP. Cabinet will be asked to confirm how this matter will be dealt with as part of the next version of the LDS which is due to be considered in due course.
  - 3.1.2.2 Given this, and the fact that the SAP remains in draft, unlike the NDP sites, it is not considered that the proposed allocations and reserve sites identified within the SAP can be included within the 5-year supply prior to them being allocated within the SAP or SWLP unless they are promoted through the development management process.
  - 3.1.2.3 Notwithstanding this, Officers have undertaken an initial desktop assessment, using the same methodology as for NDP sites, which identifies that 16 SAP sites (which don't have planning permission and aren't included in NDPs) are considered to have the potential to deliver between 667 and 779 homes within the 5-year period. It should be noted that a number of sites deliver in excess of 200 homes so it cannot be assumed that they will be fully built out in the 5-year period, although any measures that the Council adopt to speed the build of sites (see AP 9-13 below) may enable these figures to be uplifted.
  - 3.1.2.4 Subject to Member confirmation, given their inclusion within the SAP, it is proposed that Policy Officers liaise with site promoters to actively seek to encourage these sites to be brought forward. Once a resolution to grant planning consent is made, they should be capable of being included within the 5-year supply provided there is sufficient evidence to demonstrate deliverability.
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**Table 2 - SAP Tranche 1 and Tranche 2 Sites – Initial desktop assessment**

Site Name/SAP Reference	Indicative Dwelling Capacity - working assumption	Number of Units that could be Deliverable within 5 years from April 25
ALC.A - South of Allimore Lane (west), Alcester	60	60
ALC.B - South of Allimore Lane (east), Alcester	30	30
BID.A - East of Jacksons Meadow, Bidford-on-Avon	40	40
BID.B- Moorlands Lodge, off Victoria Road, Bidford-on-Avon	6	6
HAMP.A - East of Snitterfield Road, Hampton Lucy	13	13
MM.A - North of Brook Lane, Moreton Morrell	5	5
MM.B – South of Brook Lane, Moreton Morrell	8	8
MM.C - South of John Davis Drive, Moreton Morrell	20	20
NAP.A - East of Butt Hill, Napton-on-the-Hill	6	6
PM.A - South of Byfield Road, Priors Marston	10	10
SOU.B - East of Banbury Road, Southam	120	80
STR.A - North of Evesham Road (AKA Bordon Hill), Stratford-upon-Avon*	N/A	N/A
STR.B - East of Shipston Road, Stratford-upon-Avon	210	80
STR.C - South of Alcester Road, Stratford-upon-Avon **	56	56
STR.D - East of Banbury Road, Stratford-upon-Avon	150	80
TRED.A - South of Blackwell Road, Tredington	13	13
LRS.A - Adjacent former Long Marston Depot, Long Marston	90	80
LRS.B - North of former Harbury Cement Works, Bishop's Itchington	210	80
PILL.A - East of Kineton Road, Pillerton Priors	13	13
SOU.A - West of Banbury Road, Southam	75	75
TIDD.A - South of Sid Courtney Road, Tiddington	24	24
Total number of dwellings that could be deliverable in 5 years (green sites only)	1047	667
Total number of dwellings that could be deliverable in 5 years (green and amber sites)	1159	779

Notes - \* not applicable as now has planning permission so supply will be counted elsewhere subject to deliverability. \*\* are pending determination.

Contribution	Resource	Timeframe
Very High 667 - 779	Medium	Medium

### 3.1.3 *Sites within the emerging SWLP process [AP4]*

3.1.3.1 As part of the process of preparing the SWLP a number of calls for sites have been issued. Through this process and the Council's own Housing and Economic Land Availability Assessment (HELAA) document a number of potential further non-strategic housing sites, outside of the designated Green Belt and the Area of Outstanding Natural Beauty, have been identified. This exercise has focussed on non-strategic sites with less than 300 home capacity. This is because new large strategic large sites will have a lead in time that means significant delivery is unlikely to happen on them in the 5 year period.

3.1.3.2 These further sites are being subjected to a similar desktop exercise as for the NDP and SAP sites. Whilst this assessment is still ongoing, it is apparent from its early stages that a considerable number of sites are being promoted through this process. Over 200 sites are currently being looked at through the process and the theoretical capacity of these sites is considerably greater than the potential shortfall in housing needs identified. The theoretical capacity of these sites is in excess of 18,000 homes, albeit this will reduce to nearer 10,000 once assumptions are applied about the level of development that may be deliverable within the 5 year period. It should be noted that it should not significantly prejudice the SWLP as even at the upper end of the range that may be required from these sites (see para 7.4 below) it will involve less than 15% of the smaller sites currently being promoted through the SWLP.

3.1.3.3 However, whilst there is a considerable evidence base on these sites, the Council has not yet made any decisions on which of these sites may be considered favoured for allocation in the emerging SWLP. This is likely to be done in the early part of 2026. These sites also remain some way off being able to be included in the 5-year supply figures as an emerging allocation does not meet the NPPF definition of deliverable. Typically, such sites would need to either be allocated in a development plan or have a grant of permission in principle to be considered potentially deliverable. Further evidence to demonstrate deliverability would also be required.

3.1.3.4 Subject to Member confirmation, given their inclusion within the emerging SWLP, it is proposed that Policy Officers liaise with site promoters to actively seek to encourage these sites to be brought forward. Once granted planning consent, they will be capable of being included within the 5-year supply provided there is sufficient evidence to demonstrate deliverability.

Contribution	Resource	Timeframe
Up to 10,000 (Very High)	High (due to high number of possible sites)	Medium/Long

### 3.1.4 *Potential Grey Belt Sites [AP5]*

- 3.1.4.1 The December 2024 update to the NPPF made changes to policy around the application of the Green Belt designation. This included introducing the concept of “grey belt”, referring to areas within the Green Belt designation which perform less strongly in relation to three of the five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to preserve the setting and special character of historic towns. This definition excludes land subject to certain environmental and heritage designations and non-designated assets.
- 3.1.4.2 NPPF Paragraph 155 goes on to clarify that development on Grey Belt should not be regarded as inappropriate where all of the following apply (paraphrased):
- a. The development is on grey belt land and wouldn’t fundamentally undermine the wider purposes of the Green Belt
  - b. There is a demonstrable need for the development
  - c. The location is sustainable
  - d. For major housing development, the “Golden Rules” are met (relating to provision of affordable housing, infrastructure and green space).
- 3.1.4.3 As part of the preparation of the SWLP, a Green Belt Review is underway which will provisionally identify land which may have Grey Belt potential. A clear determination of whether a location is grey belt can only be made on a site-by-site basis. This is because some of the environmental and heritage assets excluded from the Grey Belt definition are non-designated, and in some cases their presence would only be identified by detailed site assessment work. It must then be assessed whether the presence of the asset provides a strong reason for refusing or restricting development. It is likely to be a further month before an initial estimate of short-term capacity can be generated.
- 3.1.4.4 Subject to Member confirmation, following finalisation of the Green Belt Review, it is proposed that Policy Officers liaise with site promoters to actively seek to encourage Grey Belt sites to be brought forward. Once granted planning consent, they will be capable of being included within the 5-year supply provided there is sufficient evidence to demonstrate deliverability.

Contribution	Resource	Timeframe
TBC	Medium	Medium/Long

### 3.1.5 *Potential Urban Capacity sites [AP6]*

- 3.1.5.1 As part of the evidence base for the emerging SWLP an urban capacity study across both Districts was conducted by Arup. The results of this
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study were published in October 2022 and remain available to view on the SWLP website<sup>4</sup>.

- 3.1.5.2 This document has been initially assessed for its potential for identifying sites that will contribute to regaining a 5-year supply. This has concluded that there are 11 sites (which had a theoretical cumulative capacity for housing of 399 units). Owing to the NPPF definition of deliverable, urban capacity sites in theory, provide a source of supply that can readily be recognised in the 5-year supply. However, this will involve updating the brownfield register to enable these to be captured. The practice around such sites is rarely simple as they will need to meet the other aspects of being deliverable (such as being available now rather than current in alternate use) and the evidence of deliverability will need to be compelling. For this reason, the contribution their likely contribution to short term supply is estimated as minimal in the table below.

<b>Table 3 – Urban Capacity Sites – Initial desktop assessment</b>		
<b>Site Name</b>	<b>Indicative Dwelling Capacity - working assumption</b>	<b>Number of Units that could be Deliverable within 5 years from April 25</b>
Land north of railway station car park, Western Road, Stratford-upon-Avon	21	21
Land at Stratford Parkway Rail Station	120	120
Wood Street Car Park, Southam	8	8
Land north of Saffron Meadow, Stratford-upon-Avon	11	11
Site at Junction of Western Road and Birmingham Road, Stratford-upon-Avon	9	9
Stratford-Upon_Avon Train Station	15	15
Arden Street Car Park, Stratford-upon-Avon	14	14
Land at Oxford Street, Southam	11	11
Brickyard Lane Redevelopment, Studley	85	85
The Maybird Centre	72	72
Wellesbourne Divisional Highways Depot	33	33
Total number of dwellings that could be deliverable in 5 years (green sites only)	21	21
Total number of dwellings that could be deliverable in 5 years (green and amber sites)	169	169

- 3.1.5.3 Subject to Member confirmation, it is proposed that Policy Officers liaise with site promoters to actively seek to encourage appropriate Urban Capacity Study sites to be brought forward. Once granted planning consent, they will be capable of being included within the 5-year supply given appropriate evidence on delivery.

<sup>4</sup> See [South Warwickshire Urban Capacity Study - Report v3.1 Issue Final.pdf](#)

Contribution	Resource	Timeframe
21 – 169	High	Short

### 3.1.6 *Potential from Empty Homes [AP7]*

- 3.1.6.1 Standard national datasets available<sup>5</sup> record that the number of dwellings in Stratford-on-Avon District that were classed as empty for more than 6 months in October 2024 as 1,137. Whilst there is no evidence to suggest that a problem of empty homes is greater in Stratford-on-Avon than elsewhere, in theory, *if* a significant proportion of these long-term empty homes could be brought back into use it could go some way towards meeting housing needs.
- 3.1.6.2 Typically, there are often complex reasons behind homes being empty and the Council’s powers to intervene where this is the case are not strong. As such, bringing empty homes back into use is resource intensive. Furthermore, the Council needs to ensure that empty homes are not double counted and do not already feature within the housing stock. If this is the case, then there is no net increase in supply.
- 3.1.6.3 Further detailed assessment and specialist advice is being taken and this suggests due to the LHN methodology it is likely that empty homes would need to be considered abandoned before being brought back into use to be able to count towards land supply. It is there recommended that this measure is not pursued any further.

Contribution	Resource	Timeframe
0 (to 5 year land supply)	High	Long

### 3.2 **(b) Granting Additional Planning Consents [AP8]**

- 3.2.1 Ultimately, the only way the Council will re-establish its 5-year supply in advance of the adoption of the SWLP is through the granting of additional planning consents. This increase in housing within the District is not unexpected as the Council is intending to meet its housing needs in full through the SWLP e.g. a minimum of 1,126 homes per annum. Whilst the expectation would be that this would happen from 2026/27, the current 5-year supply position has simply brought the need to provide additional homes forward.
- 3.2.2 A number of applications for residential development have been received by the Council (as well as a number of pre-application enquiries). Whilst many of these sites will fall into the categories outlined in Section 3.1, there will be some speculative sites as well.
- 3.2.3 The Council will need to determine every application on its own merits in accordance with Paragraph 11 of the NPPF, applying the presumption of sustainable development. This is also known as the tilted balance where the weighting is in favour of granting consent.

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<sup>5</sup> See [Council Taxbase 2024 in England - GOV.UK](https://www.gov.uk/government/collections/council-tax-base-2024-in-england)

- 3.2.4 Members should also be aware that the Council is also reviewing sites currently pending appeal and may need to concede its position given the change in circumstances.
- 3.2.5 Whilst the Council is not in an enviable position, it is important to note that by taking a positive and proactive approach to development proposals, the Council's position is stronger and will achieve better outcomes for residents because it will be able to negotiate on applications, impose appropriate planning conditions and agree to s106 planning obligations. In refusing applications, it loses its influence in these matters which are then dealt with by the Planning Inspectorate. In addition, the Council will face significant resource and budgetary implications in defending appeals.
- 3.2.6 All the potential homes identified through measures AP2-7 above will need to be progressed through the development management process in order to demonstrate that they represent deliverable capacity. However, in addition to any supply that the authority can identify it should be noted that the market may separately identify and promote sites. This process, is already underway and will deliver some level of supply. An initial review of known sites where there is currently development management activity has been undertaken. For purposes of developing the action plan it is suggested that an initial estimate of 1000 deliverable homes in the 5 year period may not be unreasonable.

Contribution	Resource	Timeframe
1000	High	Long (but ongoing and starting immediately)

- 3.2.7 In all cases where consent is granted, an assessment will be made as to the deliverability of the site and its contribution to the 5 year supply. In this regard, full applications (as opposed to outlines) for major schemes are preferred. Notwithstanding this, as set out in below, the Council can explore how to speed up delivery of consented sites.
- 3.2.8 Of particular note is the role that Policy Officers could play in being proactive to liaise with our partner housing associations to encourage bringing forward Local Need Schemes or schemes that provide a greater onsite provision of affordable housing (i.e. above 35%).
- 3.3 ***(d) Measures which may be taken to speed-up the delivery of sites once identified***
- 3.3.1 Initial work on action plan have identified the following possible measures:
- [AP9] - Use of short-dated consents – this could involve shorter dates for the commencement of implementation where full planning permission has been issued and/or short deadlines for the submission of reserved matters
  - [AP10] - Faster processing of reserved matters/simpler s106 agreements
  - [AP11] – Requesting delivery statements alongside submitted applications
-

- [AP12] – Flexing s106 agreements requirements in return for faster build outs
- [AP13] - Measures to unlock allocated or consented sites that are stalled

3.3.2 In respect of [AP9], Planning Practice Guidance states:

*"Under [section 91 Town and Country Planning Act 1990](#) if the local planning authority grants planning permission it is subject to a condition that sets the time limit within which the development must begin.*

*The relevant time limit for beginning the development is not later than the expiration of:*

- *3 years beginning with the date on which the permission is granted, or;*
- *such other period (whether longer or shorter) as the local planning authority may impose.*

*The local planning authority may wish to consider whether a variation in the time period could assist in the delivery of development. For example, a shorter time period may be appropriate where it would encourage the commencement of development and non-commencement has previously had negative impacts.*

*The national planning policy framework encourages local planning authorities to consider imposing a shorter time period to ensure that proposals for housing development are implemented in a timely manner. A longer time period may be justified for very complex projects where there is evidence that 3 years is not long enough to allow all the necessary preparations to be completed before development can start."*

3.3.3 Further work is needed on all the above measures to understand how they can be implemented. It is important to note that the government is committed to changing the planning system in a number of ways and whilst the timing and nature of these changes remain uncertain it is possible that these will increase the powers available to local authorities to speed delivery. These measures are outlined below

#### **Emerging changes to planning system related to build out**

3.3.4 In May this year MHCLG published a planning reform working paper on speeding up build out in the planning system. It was one of a series of working papers on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector. It remains available to view online<sup>6</sup>. It was published along a technical consultation on implementing measures to improve Build Out Transparency<sup>7</sup>.

3.3.5 The paper invited views on further action the government should take to speed up homes being built. It stressed that this was part of a wider

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<sup>6</sup> [Planning Reform Working Paper: Speeding Up Build Out - GOV.UK](#)

<sup>7</sup> [Technical consultation on implementing measures to improve Build Out transparency - GOV.UK](#)

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process and that in the coming months the government was intending to further streamline the planning system by introducing:

- more 'rules-based' national policies for development management;
- creating a more proportionate statutory consultee system; and
- finalising the proposed National Scheme of Delegation in relation to planning committees.

3.3.6 The paper stated an intention to:

1) introduce a build-out reporting framework involving requirements to:

a. **submit a build out statement** with a planning application to local planning authorities (LPAs)

b. **notify LPAs** before development is commenced through a commencement notice

c. **report annually to LPAs on housing delivery** through a development progress report.

2) implement a new power for LPAs to decline to determine planning applications made by persons who applied for, or who are connected to, an earlier planning permission for the development of land in the LPA's area which has not been built out at a reasonable rate; and

3) implement reforms to the operation of completion notices increasing the powers of LPAs to require completion of development within a certain period of time with the possibility the planning permission will cease if not completed in a reasonable time.

3.3.7 The above measures are being considered pursuant to the Levelling Up and Regeneration Act which was enacted in 2023 under the previous government.

3.3.8 It also went on to raise the following:

Mixed tenure thresholds - bringing forward additional policies to support mixed tenure development, including a site size threshold above which sites must deliver on a mixed tenure basis. This is viewed as supporting broader market diversification and increasing supply overall.

Further simplification of the Compulsory Purchase Order framework. This will require secondary legislation to implement expected later this year; and

The possibility of introducing a delayed homes penalty which would be available to local authorities for development which falls materially behind pre-agreed build out schedules (see above). The working paper recognised that it would be important that the penalty did not disincentivise land being brought forward for development. It sought views on this matter and propose further consultation before introduction.

3.3.9 In relation to AP10 and AP13 in addition to steps that may be taken by the District Council to streamline and simplify procedures the role of statutory consultees will be particularly important as in practice such consultees are also involved in the process of negotiating section 106 consents and concerns they have raised may result in sites becoming stalled. The role

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of the County Council who are both Local Highways Authority and Lead Local Flood Authority, and the Environment Agency, is particularly important here. One possible approach to speeding up the engagement with both organisations would be look to enter into performance agreements with them. This has not been investigated further at this stage, the resource implications of doing this may be significant so would need further detailed work in due course.

### **Conclusion on measures to speed up the Planning Process**

- 3.3.10 In combination it is difficult to quantify a level of additional supply that may be delivered through measures to speed out build out. For purposes of the assessment it is suggested that an assumption of an additional supply of 400 homes may be assumed to be delivered. This is largely based on the level of stalled sites that may be able to be unlocked so they can progress. It should also be noted that a number of these measures may need to be applied in order to be able to deliver the assumptions identified against the additional sources of supply.
- 3.3.11 Notwithstanding the above, Members attention is drawn to the implications of [AP12] and a steer from Members on the appropriateness of this measure is sought. The practical reality of this measure could be a reduction in the level of on-site affordable housing, for example, in exchange for guaranteed quicker build out, especially of social housing. Advice would be needed on the enforceability of this approach.
- 3.4 ***(d) Changes to supply assumptions [AP14 & AP15]***
- 3.4.1 Two possible sources of supply that other local authorities appear to have been successful at including within the housing supply pipeline are assumptions about future rates of windfall housing within 5 years and Non C3 uses classes.
- 3.4.2 Windfall housing sites [AP14] – where there is evidence that typically small sites occur at a particular rate over time it may be possible to include assumptions on this. It should be noted that any such assumption will need to be strongly evidenced to be robust so will need to be relatively conservative and any such assumption will only be applicable to the latter years of the 5 year period as any windfall development that will be delivered in the first 2 years of the 5 year supply will inevitably have planning permission already so effectively will already be included in supply figures. However, where there is high rate of delivery from windfall sources and it can be demonstrated that the time between permission being granted and build out occurring is typically less than 5 years there is a case for including an assumed level this with the supply.
- 3.4.3 Initial assessment on this matter has established that the mean annual delivery of homes on small windfall sites from 2011-2025 was 167 homes per year. Applying a 5% reduction to ensure the reliability of the allowance and limiting this to the final two years of the supply results in a figure of 316 which may be considered to be a robust estimate capable of inclusion in the housing land supply.

Contribution	Resource	Timeframe
316	Low	Short

3.4.4 Non C3 uses classes [AP15] – Housing and flats fall within use class C3 of residential development. However, there are other forms of specialist accommodation that fall outside of this use class (particularly some forms of specialist accommodation for students or for the elderly). Evidence will need to be assembled on both the extent of the pipeline for such development and the conversion rate into housing as the provision of a unit of specialist provision (such as for dementia care where only one person out of a couple needs the care) doesn't necessarily free up a home for reoccupation.

3.4.5 Initial assessment on this matter has established there are commitments of 112 older person bedspaces that are presently considered deliverable. As these will tend to be single occupancy and the housing stock has an average of 1.83 residents per dwelling a discount factor needs to be applied. This results in a figure of 61 which can be included in the land supply.

Contribution	Resource	Timeframe
61	Low	Short

3.4.6 Whilst neither source of supply will be particularly significant, given preparation of the right evidence it is considered a relatively quick win in relation to housing supply.

#### **4 Consultation and Members' comments**

4.1 Councillor George Cowcher, Portfolio Holder for Planning and Economic Development has been consulted on this report and these have been incorporated where appropriate. Councillor Cowcher is supportive of the recommendations in the report and notes the need to address the issue and regain a 5-year supply of housing.

4.2 In particular, and given the importance of the issue, Councillor Cowcher has suggested that a Member advisory group be established to assist with oversight and delivery of the Action Plan. This group would be established via a revised Leaders Statement. The group would receive regular reports on progress with delivering action plan measures, be able to advise on relative priorities, and maintain an overview of the progress that may be able to demonstrated in regaining a 5-year land supply. The terms of reference for the group still need to be drafted and agreed but it is suggested that the member group will be chaired by Councillor Cowcher as Portfolio Holder for Planning and Economic Development.

#### **5 Implications of the proposal**

##### **5.1 Legal Implications**

5.1.1 Any legal ramifications arising from the proposed Action Plan measures will be fully considered prior to their inclusion within the Action Plan. Whilst it is not a legal requirement, it is the responsibility of Stratford-on-Avon District Council to demonstrate a 5-year supply of deliverable housing sites. To do this, the Council will need to approve additional planning applications. These will need to be assessed on a case-by-case basis and determined in accordance with the Development Plan/NPPF, as appropriate.

5.1.2 In instances where the planning committee is minded to refuse an application, Members are politely reminded that any refusal must be based on valid planning reasons.

## 5.2 **Financial**

5.2.1 The current situation poses immediate and longer-term financial challenges. The need to uplift our housing supply can only be achieved through the granting of additional planning consents and additional planning officers to handle the significant increase in workload. Additional resources will also be required in respect of internal specialist consultee roles such as landscape, conservation, trees, affordable housing, CIL & S106, green spaces and environmental health as well as external consultees such as County highways and flooding. Given the priority of progressing with the SWLP, additional planning policy resources will also be required to both monitor the 5YHLS and work proactively to identify sites without diluting the resource required to deliver the SWLP.

5.2.2 Whilst longer term staffing to deal with the step-change in housing delivery will be considered through the Council's corporate budget setting process, additional temporary resources are required in the short-term to deal with the immediate surge in applications. This can be funded through the expected increase in planning income resulting from the increased number of applications (and in the context of the previous national increase in planning application fees).

5.2.3 Graph 1 (overpage) compares income received to date this year (2025/26) with income received in each of the previous five years. As can be seen, income received in the first six months of this year has already exceeded the total income for the previous highest year 2022/23. This is without taking into account the projected income for the remainder of the year (based on the level of pre-application advice).

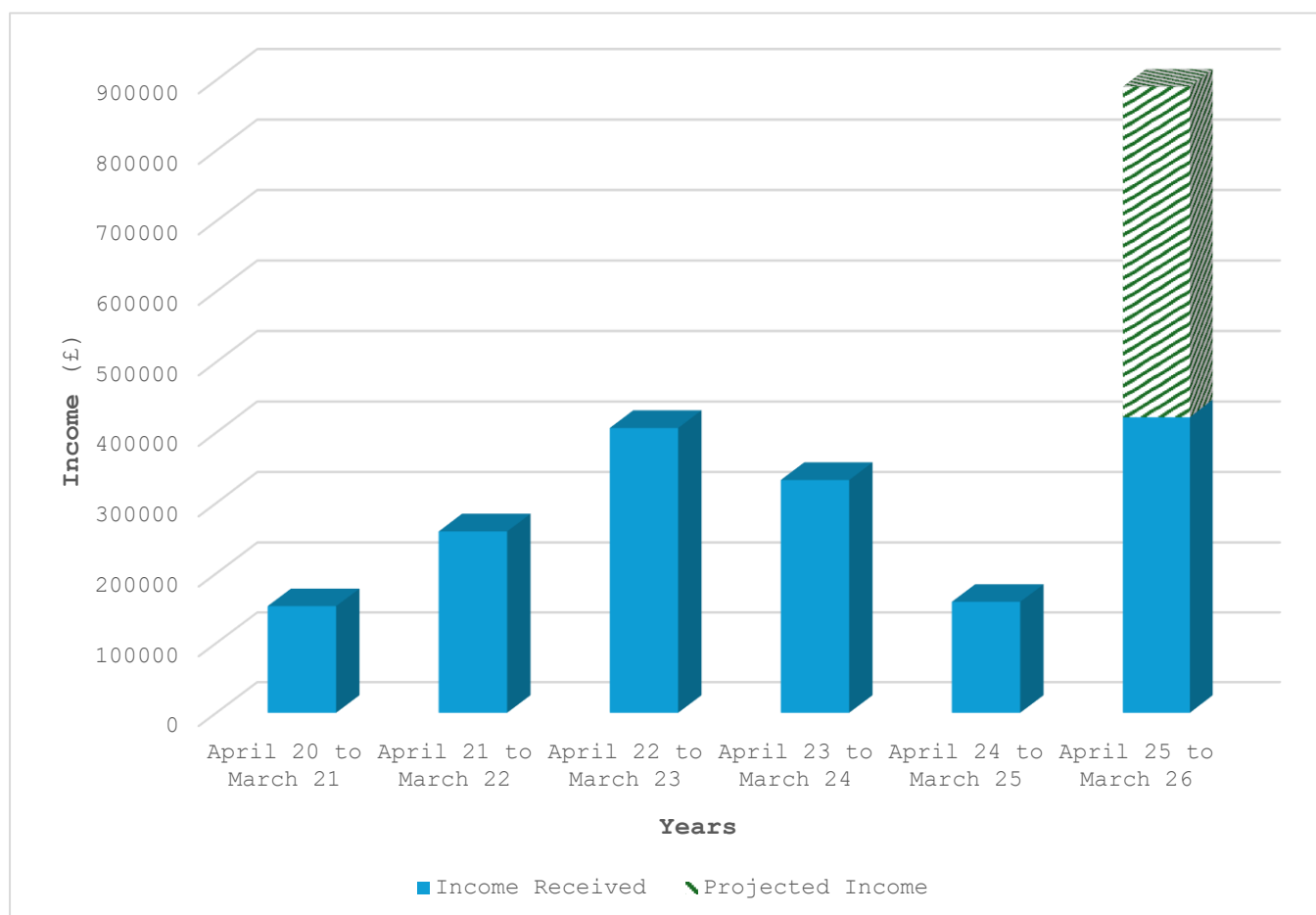
5.2.4 As such, based on the income received and projected income for 2025/26 (circa £450,000), it is considered that the Council has sufficient budget to fund necessary additional posts on a temporary basis.

5.2.5 The Council also needs to be mindful of the impact on external stakeholders, particularly statutory consultees and ensuring that they can continue to comment on applications in a timely fashion so as not to delay decision-making. The consequences of failing to issue timely decisions could be significant. As noted above, the Council could look to enter into performance agreements and this needs further investigation and consideration of the financial resources of doing so.

5.2.6 The Council could recoup some costs by entering into Planning Performance Agreements that offer a bespoke service to applicants for a pre-arranged fee. However, to do so, the Department needs to be adequately resourced to ensure any contractual arrangements are met. Any increase in applications would also see an increase in CIL & s106 income which could offset the increase in staffing resources in this regard.

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**Graph 1 Planning Fee Income**



5.2.7 Members should also be mindful of the significant costs associated with planning by appeal; not just in terms of staffing (dealing with the appeal) and legal costs but also with the potential for costs awards against the Council which could be significant, especially if the Council has been found to have acted unreasonably when refusing an application.

### 5.3 **Council Plan**

5.3.1 The preparation of an Action Plan to further the options outlined in this report is consistent with the Council Plan in so far that it seeks to set out a proactive and positive response to the challenging situation that the Council now finds itself in with regards to housing supply. Doing so is considered to be in the best interests of residents and communities across the District and approving applications (as opposed to defending planning appeals) is considered to be the most responsible use of Council resources. Implementing measures to accelerate the recovery of a robust housing land supply position will also contribute to boosting the local economy.

5.3.2 The Council is mindful of the infrastructure implications that a significant increase in housing will have on existing communities. Whilst sites will need to 'swallow their own smoke', the Council is keen to ensure that infrastructure providers (a) do not miss the opportunity to secure necessary infrastructure or commuted sums from individual sites and, more importantly, (b) are alive to the potential cumulative infrastructure

implications of numerous sites being brought forward in separately but in close proximity. The Council is keen to work with infrastructure providers in tis regard.

#### 5.4 ***Environmental/Climate Change Implications***

5.4.1 There are no direct climate change or environmental implications arising from this report. Any environmental and climate change implications arising from specific planning applications will be considered and assessed as part of the planning application itself.

#### 5.5 ***Analysis of the effects on Equality***

5.5.1 A screening exercise has been undertaken in the preparation of this report and there were found to be no implications.

#### 5.6 ***Data Protection***

5.6.1 There are no data protection implications arising from the recommendation of this report.

#### 5.7 ***Health and Wellbeing***

5.7.1 There are no direct health and safety implications arising from this report.

#### 5.8 ***Human Resources/Staffing***

5.8.1 As set out in Section 5.2 above, additional staffing resources are required immediately and longer term to manage the housing supply situation. Whilst longer term staffing to deal with the step-change in housing delivery will be considered through the Council's corporate budget setting process, additional resources are required in the short-term to deal with the immediate surge in applications. This will require additional temporary staff across both Development Management and Policy Services as the Council.

5.8.2 It should be noted that consideration also needs to be given to the resources available to other SDC departments and whether additional workloads could be met through additional financial resource or whether additional staffing resource is also required.

### **6 Risk Assessment**

6.1 Whilst it is acknowledged that approving additional applications will have political risks, these are far outweighed by the risks of not doing so and the futility of resisting development that is otherwise necessary.

6.2 The greatest risk is in not granting planning applications for additional residential development. This will have two consequences: firstly, it will just take longer to remedy the problem and could result in more housing being granted than required, and secondly, if we were to abdicate our responsibilities and enter 'planning by appeal territory' not only would SDC experience significant resourcing and budgetary increases (including paying cost awards to appellants) but we would also weaken our ability to influence the design of schemes and negate our ability to impose necessary planning conditions and enter into appropriate planning obligations.

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6.3 Ultimately the quicker that SDC can remedy the shortfall, the quicker SDC can regain control of development in advance of the adoption of the SWLP.

## 7 Conclusion/Reasons for the Recommendation

7.1 It is concluded that, whilst it is disappointing that the Council's position in relation to its housing land supply has not been supported, the Council does have a variety of possible measures at its disposal, which if applied, will enable it to regain effective control of development across the District. However, the fact remains that the District needs to accommodate significant additional development in advance of the adoption of the SWLP. To do this, there will need to be a significant increase in the number of planning applications granted planning permission.

7.2 The Council can also be proactive and the possible Action Plan and likely efficacy of individual measures is summarised in the table below:

**Summary table of initial assessment of Possible Action Plan measures**

Measure	Contribution	Resource	Timeframe	Comment
<b>AP1 – Produce Interim Policy Statement</b>	N/A	Med	Short	Will support various other measures and give basis for monitoring progress
<b>Bringing forward more sites to contribute to 5-year supply:</b>				
<b>AP2 – NDP allocations</b>	115-448	Low	Short	
<b>AP3 – Draft SAP sites</b>	667-779	Med	Med	
<b>AP4 – Emerging SWLP sites</b>	(up to 10,000) Very High)	High	Med	
<b>AP5 – Grey Belt sites</b>	TBC	Med	Med/Long	
<b>AP6 – Urban Capacity Sites</b>	21-169	High	Short	Will need updated Brownfield register to be produced
<b>AP7 - Empty Homes</b>	0	High	Short	Technical and legal advice suggests that this could not be counted towards supply
<b>Development Management Measures through:</b>				
<b>AP8 - Granting Additional</b>	1000	High	Short	Will happen irrespective of

Measure	Contribution	Resource	Timeframe	Comment
<b>Planning Consents</b>				whether action plan is pursued
<b>AP9 – Short Dated Consents</b>	400	Med	Short	
<b>AP10 – Faster processing of RM/sec 106s</b>		High	Med	
<b>AP11 – Delivery Statements</b>		Med	Short	
<b>AP12 – Flexing sec 106 agreements</b>		Med	Med	
<b>AP13 – Tackling stalled sites</b>		High	Med/Long	
<b>Changes to supply assumptions</b>				
<b>AP14 - Windfall</b>	316	Low	Short	
<b>AP15 – Non C3</b>	61	Low	Short	
<b>Total</b>	2580-3173			

- 7.3 The above initial analysis does give some considerable confidence that should members decide to pursue an appropriate mix of the above actions it should prove to be possible to regain effectively control of the planning system in advance of the adoption of the SWLP.
- 7.4 Initial sources of supply that have been identified may contribute 2580-3172 homes to meeting the 3500-4000 home shortfall identified in para 1.11.2. This would leave a minimum of 327 and maximum of 1420 homes to be identified through other measures. This is a significant number of sites and will involve considerable resources.
- 7.5 However, it should be noted that this does not represent a quick fix and realistically the process may take until the summer of 2027 to complete. Therefore any measures to promote further development will need to be used alongside taking a positive approach to development management and determining applications in accordance with the tilted balance in the meantime. The risks around resources and timescales are addressed further elsewhere in this report.

John Careford

HEAD OF DEVELOPMENT

**Background papers:**

None.

## Form A1

### **INITIAL SCREENING FOR STRATEGIES/POLICIES/FUNCTIONS FOR EQUALITIES RELEVANCE TO ELIMINATE DISCRIMINATION, PROMOTE EQUALITY AND FOSTER GOOD RELATIONS**

1. Please provide a summary of the proposal (including any legislation/guidance if relevant)

Pursuing various measures as part of action plan to increase the level of housing supply across the District to allow the Council to regain effective control of the planning system within a timeframe of around 18 months

2. Tick **all** of the coloured boxes appropriately depending on degree of relevance/priority to each of the equality strands set out below following an assessment of the **OVERALL IMPACT DESCRIPTORS**.

High relevance/priority    
  Medium relevance/priority    
  Low or no relevance/ priority

Business Unit/ Services:	Relevance/Risk to Equalities																								
State the Function/ Policy /Service/ Strategy being assessed:	Gender	Race	Disability			Sexual Orientation	Religion/Belief	Age	Gender Reassignment	Pregnancy/ Maternity	Marriage/ Civil Partnership (only for staff)														
	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

### **OVERALL IMPACT DESCRIPTORS**

The following descriptors are designed to help the assessor understand the potential equalities implications of the decision/proposal.

	Low or no relevance/priority <b>(Green)</b>	Medium relevance/priority <b>(Orange)</b>	High relevance/priority <b>(RED)</b>
<b>LEGAL</b>	Complaint/ initial challenge - may be easily resolved	Internal investigation following a number of complaints/ challenges	High level challenge resulting in Judicial Review / Ombudsman Complaint following unresolved complaints/ challenges

	<b>Low or no relevance/priority (Green)</b>	<b>Medium relevance/priority (Orange)</b>	<b>High relevance/priority (RED)</b>
<b>FINANCIAL</b>	Little or no additional financial implication as a result of the decision/ proposal	Medium level financial implications - internal legal costs & internal resources	High or even severe financial impact - External legal advice and internal resources
<b>PEOPLE</b>	No or Low or level of impact on isolation, quality of life, achievement, access to services. Unlikely to result in harm or injury. Mitigating actions are sufficient	Significant quality of life issues i.e. Achievement, access to services. Minor to significant levels of harm, injury, mistreatment or abuse OR, low level of impact that is possible or likely to occur with over 500 people potentially affected	Serious Quality of Life issues i.e. Where isolation increases or vulnerability is greatly affected as a result. Death, Injury and/or serious mistreatment or abuse of an individual for whom the Council has a responsibility OR, a medium level of impact that is likely to occur with over 500 people potentially affected
<b>REPUTATION</b>	Little or no impact outside of the Council	Some negative local media reporting	High levels of negative front page reports/ National attention and media coverage

**3. If low or no relevance please complete the Equalities Section in the applicable Committee Report.**

**There are potential significant legal, financial, people and reputational impacts of the report. However, these do not relate to equalities legislation or impact differently on people of different characteristics. They are considered further in the report above**

**4. If Medium or High relevance/priority please complete the Equality Impact Assessment form (to be attached to the Committee Report as an Appendix).**