

Decision Maker: **DEVELOPMENT CONTROL COMMITTEE**

Date: **9 March 2022**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **HOUSING DELIVERY TEST UPDATE**

Contact Officer: Ben Johnson, Head of Planning Policy and Strategy
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Chief Officer: Tim Horsman, Assistant Director (Planning)

Ward: (All Wards)

1. Reason for report

1.1. This report provides an update on the 2021 Housing Delivery Test results and the implications for Bromley. The results trigger the requirement to prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years; this should be published within six months of the 2021 Housing Delivery Test results being published (i.e. by July 2022).

2. RECOMMENDATION(S)

2.1. That Members note this report.

Impact on Vulnerable Adults and Children

1. Summary of Impact: No impact
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Corporate Policy

1. Policy Status: Not Applicable
 2. BBB Priority: Regeneration
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Financial

1. Cost of proposal: Costs associated with producing the Housing Delivery Test action plan will be met by the Planning Policy and Strategy department.
 2. Ongoing costs: N/A
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2021/22
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Personnel

1. Number of staff (current and additional): 10fte
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: The Housing Delivery Test is not a statutory test; the requirements are set out in the National Planning Policy Framework and Planning Practice Guidance.
 2. Call-in: Not Applicable
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Procurement

1. Summary of Procurement Implications: N/A
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: N/A.

3. COMMENTARY

Background

- 3.1. The Housing Delivery Test (HDT) was introduced through a revision to the National Planning Policy Framework (NPPF) published in July 2018. The HDT sets out the net delivery of housing in a local planning authority (LPA), measured against the number of homes required (i.e. the LPAs housing target where the target is in an up-to-date Local Plan or London Plan)¹. The HDT measurement is published annually by the Department for Levelling Up, Communities and Local Government (DLUHC). The HDT period covers the previous 3 financial years; in the case of the latest 2021 measurement, published in January 2022, the years are 2018/19, 2019/20 and 2020/21².
- 3.2. The HDT has certain punitive measures depending on the level of delivery:
- If delivery is between 85% and 94%, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
 - If delivery is between 75% and 84%, this triggers the requirement for a 20% buffer to be provided on the Borough's five-year housing land supply, as well as the need to produce an action plan.
 - If delivery is less than 75%, the presumption in favour of sustainable development in paragraph 11 of the NPPF will be triggered, as well as the requirement for a 20% buffer and the need to produce an action plan.
- 3.3. The 2020 and 2021 HDT measurements included a reduced target for part of the HDT period, to account for the impacts of the Covid-19 pandemic.

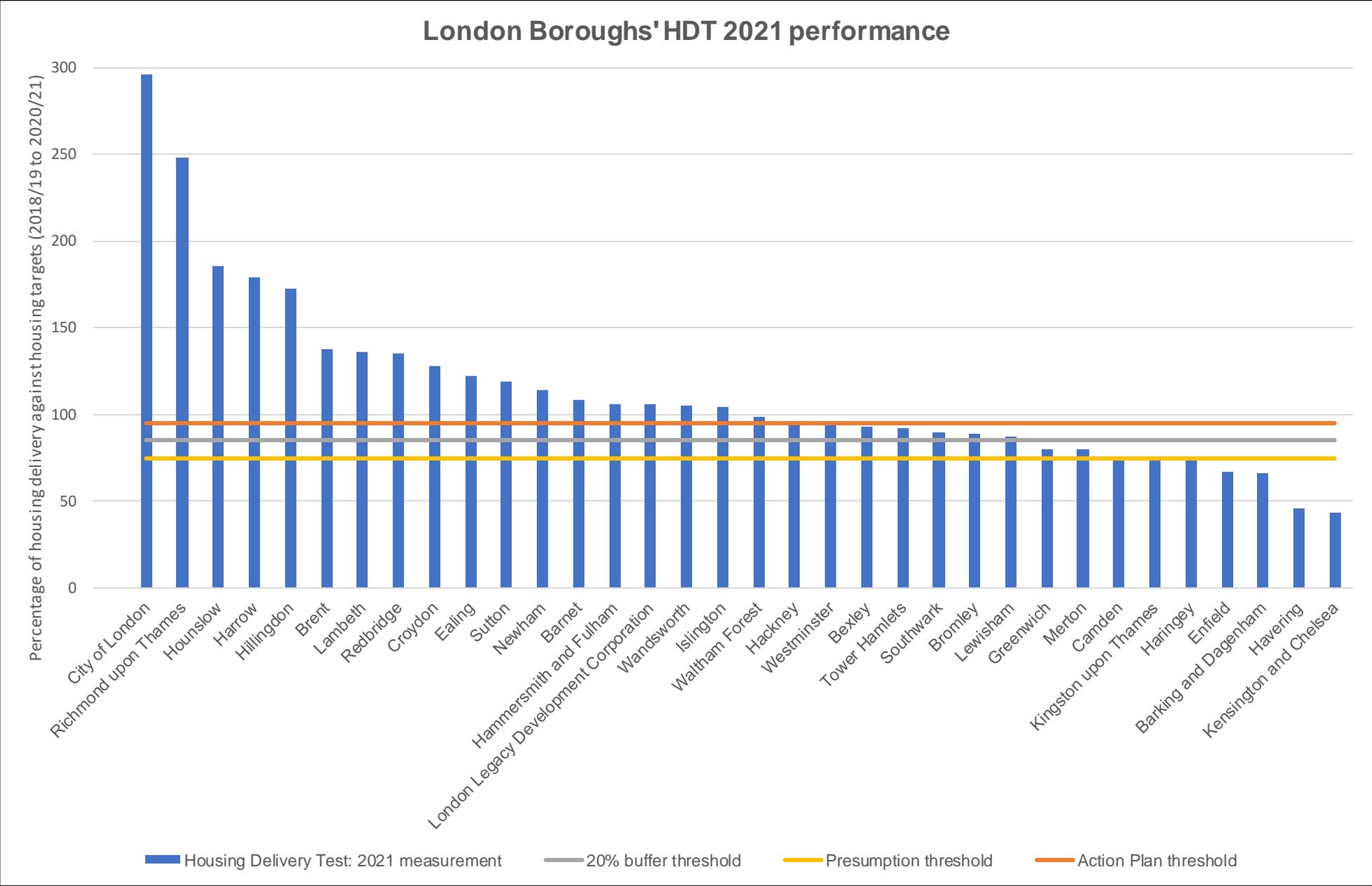
Discussion

- 3.4. The 2021 HDT measurement shows that Bromley delivered 89% of its housing target for the three-year period 2018/19 to 2020/21. This is the first time that Bromley has fallen below 95% delivery since the HDT was introduced in 2018.
- 3.5. For comparison, Figure 1 shows the 2021 HDT results for all other London Boroughs and the London Legacy Development Corporation.

¹ The Housing Delivery Test measurement rule book sets out further detail on how the measurement is calculated - <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>

² The Housing Delivery Test: 2021 measurement and supporting technical note are available here: <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

Figure 1: London Boroughs' HDT 2021 performance



- 3.6. Bromley's 2021 HDT result triggers the requirement to produce an action plan. Planning Practice Guidance (PPG) states that, to ensure the document is as useful as possible, LPAs will need to publish an action plan within 6 months of publication of the Housing Delivery Test measurement (although this is not a binding statutory deadline). This gives the LPA until July 2022 to publish the action plan. Officers intend to bring a draft action plan to a future meeting of Development Control Committee for consideration prior to publication.
- 3.7. In terms of future implications, the 2021 HDT result heightens the potential for Bromley to trigger the requirement for a 20% buffer when the 2022 HDT results are published (which would cover the period 2019/20 to 2021/22). 2018/19 is strongest year for delivery in the 2021 HDT results, making up nearly half the total for the 2021 HDT three-year period; however, this will drop out of next year's results.
- 3.8. Triggering the 20% buffer would mean that Bromley would need to find another 580 units in the five-year housing land supply. To avoid triggering the 20% buffer, 2021/22 delivery will need to be 763 units or more. However, this is not an unachievable figure and is less than our current housing target of 774 units per annum.

4. POLICY IMPLICATIONS

- 4.1. The NPPF requires the Council to produce a housing delivery test action plan, as the 2021 HDT results show that Bromley delivered less than 95% of the Borough's housing targets over the period 2018/19 to 2020/21.

5. FINANCIAL IMPLICATIONS

- 5.1. Costs associated with producing the Housing Delivery Test action plan will be met by the Planning Policy and Strategy department.

6. LEGAL IMPLICATIONS

- 6.1. There are no legal implications arising from this report.

<p>Non-Applicable Sections:</p>	<p>IMPACT ON VULNERABLE ADULTS AND CHILDREN</p> <p>PERSONNEL IMPLICATIONS</p> <p>PROCUREMENT IMPLICATIONS</p>
<p>Background Documents: (Access via Contact Officer)</p>	<p>Bromley Local Plan 2019 - https://www.bromley.gov.uk/download/downloads/id/4768/bromley_local_plan.pdf</p> <p>London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>National Planning Policy Framework (July 2021) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>National Planning Practice Guidance - https://www.gov.uk/guidance/housing-supply-and-delivery</p>