
Decision Maker: **DEVELOPMENT CONTROL COMMITTEE**

Date: **26 July 2022**

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

Title: **HOUSING DELIVERY TEST ACTION PLAN**

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 seeks endorsement of the Housing Delivery Test (HDT) Action Plan 2021, provided at Appendix 1. The Government's HDT results for 2021 showed that Bromley's housing delivery for the three-year period 2018-2021 fell below 95% of the borough housing target for this period. As a result, national planning policy states the local planning authority (LPA) should publish an action plan to identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

2. **RECOMMENDATION(S)**

- 2.1 **That Development Control Committee endorse the Housing Delivery Test Action Plan (shown at Appendix 1) for publication on the Council's website.**

Impact on Vulnerable Adults and Children

1. Summary of Impact: No Impact
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Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority:

(3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
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Financial

1. Cost of proposal: Costs associated with the preparation and publication of the action plan will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: Not Applicable:
 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 2022/23
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Personnel

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

1. Legal Requirement: No statutory requirement. The National Planning Policy Framework, paragraph 76, sets out that where the HDT indicates that delivery has fallen below 95% of the LPA's housing requirement over the previous 3 years, the authority should prepare an action plan in line with national planning guidance.
 2. Call-in: Not Applicable: No Executive decision.
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Procurement

1. Summary of Procurement Implications: N/A
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Property

1. Summary of Property Implications: N/A
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Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: N/A - no direct implications

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? N/A
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

Background

- 3.1 The 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 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.
- 3.4 The 2021 HDT measurement shows that Bromley delivered 89% of its housing target for the three-year period 2018/19 to 2020/21³. This triggers the requirement to produce an action plan. National Planning Practice Guidance (PPG)⁴ 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 HDT measurement; for the 2021 HDT results, this means the action plan should be published by the end of July 2022.

Housing Delivery Test Action Plan

- 3.5 The PPG⁵ notes the LPA is responsible for producing the action plan, involving relevant stakeholders in the process (as determined by the LPA). The LPA is also responsible for monitoring the action plan⁶.
- 3.6 The PPG identifies various issues which the LPA may wish to review as part of the action

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>

³ For further details, see Development Control Committee report 'HOUSING DELIVERY TEST UPDATE', 9 March 2022, available from: <https://cde.bromley.gov.uk/documents/s50096923/HOUSING%20DELIVERY%20TEST%20UPDATE.pdf>

⁴ Paragraph: 052 Reference ID: 68-052-20190722, <https://www.gov.uk/guidance/housing-supply-and-delivery>

⁵ Paragraph: 049 Reference ID: 68-049-20190722, *ibid*

⁶ Paragraph: 054 Reference ID: 68-054-20190722, *ibid*

plan⁷; and also notes various actions to boost housing delivery⁸. The action plan at Appendix 1 includes discussion of these issues and actions where relevant.

3.7 The decision about whether to consult on an action plan is for the LPA. Officers consider that consultation is not necessary; the issues affecting housing delivery are considered to be clear and it is not obvious what consultation with stakeholders such as land promoters or landowners will add to the document. Some of the actions identified, particularly the Local Plan review, will themselves involve several rounds of consultation. Housing delivery is also, to a large degree, out of the LPA’s control, e.g. the LPA has no powers to force developers to implement and build out planning permissions.

4. POLICY IMPLICATIONS

4.1 The NPPF requires the Council to produce a HDT 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 the preparation and publication of the action plan will be met from the Planning Policy and Strategy budget.

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6. LEGAL IMPLICATIONS

6.1 There is no legal requirement to prepare an action plan; the expectation to produce an action plan is set out in national planning policy and guidance.

<p>Non-Applicable Sections:</p>	<p>IMPACT ON VULNERABLE ADULTS AND CHILDREN</p> <p>PERSONNEL/PROCUREMENT/PROPERTY IMPLICATIONS</p> <p>CARBON REDUCTION AND SOCIAL VALUE</p> <p>CUSTOMER IMPACT</p>
<p>Background Documents: (Access via Contact Officer)</p>	<p>Bromley Local Plan 2019, available from: https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan</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), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>Planning Practice Guidance, Housing supply and delivery, available from: https://www.gov.uk/guidance/housing-supply-and-delivery</p> <p>Housing Delivery Test: 2021 measurement, available from: https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement</p>

⁷ Paragraph: 050 Reference ID: 68-050-20190722, ibid

⁸ Paragraph: 051 Reference ID: 68-051-20190722, ibid