

Local Plan Panel Meeting	
Meeting Date	8 July 2021
Report Title	Housing Delivery Test Action Plan
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Jill Peet
Key Decision	No
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That the Panel note the content of the Housing Delivery Test Action Plan; 2. That delegated authority be granted to the Cabinet Member for Planning to agree the attached Housing Delivery Test Action Plan for submission to the Secretary of State and published on the Council website.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to introduce the Council's draft Housing Delivery Test (HDT) Action Plan, a non-statutory report the Council has been asked to prepare as a result of achieving a score of below 95% in the government's Housing Delivery Test published in January 2021.
- 1.2 The purpose of the HDT Action Plan is to set out the reasons for housing under-delivery when measured against the housing requirement in the area and identify the steps the Council intends to take to drive up delivery. It should also identify ways to reduce the risk of further under-delivery.
- 1.3 The draft Action Plan attached to this report sets out the reasons for under-delivery in Swale and sets out the various measures already underway by the Council to improve this. The Council is on track to improve delivery by continuing with the actions already planned and in progress.

2 Background

- 2.1 The government published its Housing White Paper "Fixing our broken housing market" in February 2017. It set out measures that would be introduced to speed

up and increase housing delivery, to help the government achieve its target of delivering an additional 300,000 new homes a year.

- 2.2 One of the measures introduced is the Housing Delivery Test (HDT), which was formalised through the National Planning Policy Framework. This measures the net additional dwellings provided against the target homes required with results on performance for each local planning authority in England issued annually.
- 2.3 Swale Borough Council has an Objectively Assessed Need for housing of 776 new dwellings per annum. For the HDT, the delivery of new homes was assessed against this figure for the preceding three monitoring years as follows:

Monitoring year	Annual target	No. of dwellings delivered (annual figure)	Total number of homes delivered for the 3 year HDT monitoring period	Total number of homes required during the 3 year HDT monitoring period	HDT monitoring score	Housing Land Supply buffer required
2015/16	776	593				
2016/17	776	556				
2017/18	776	572	1,721	2,328	74%	20%
2018/19	776	674	1,802	2,328	77%	20%
2019/20	710*	767	2,014	2,262	89%	5%

*government adjusted figure to take into account the impacts of the Covid pandemic on housing delivery [Housing Delivery Test: 2020 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/housing-delivery-test-2020-measurement)

- 2.4 By achieving a score in the HDT test of below 95%, the Council is asked to prepare an Action Plan and as the score is above 85%, a 5% buffer is to be applied to the 5 year Housing Land Supply requirement. If the score was below 85% a buffer of 20% would be required. Members may recall that in the previous two years of the HDT score, the Council fell below the 85% score and had to apply the 20% buffer. The buffer can make a difference between whether or not an authority has a five year housing supply, particularly where delivery rates have been marginal. If the housing land supply is below 5 years, the ‘tilted balance’ in terms of determining planning applications is in play. The consequences of failing the HDT and needing to apply the 20% buffer are therefore significant.
- 2.5 The Housing Delivery Test Action Plan is an opportunity to feed back to Government the reasons for delivery below target. The draft attached at Appendix I to this item suggests that the reasons are complex and not related to the planning context; and that simply applying a requirement to increase land supply is counter – productive and does not achieve the desired results.

3 Proposals

3.1 The recommendations are therefore:

1. That the Panel note the content of the Housing Delivery Test Action Plan;
2. That delegated authority be granted to the Cabinet Member for Planning to agree the attached Housing Delivery Test Action Plan for submission to the Secretary of State and published on the Council website.

4 Alternative Options

4.1 The Council could choose not to publish the HDT Action Plan. There are no sanctions if such an action plan is not submitted to MHCLG or published but it would be prudent to do so as it explains the reasons behind the Council's lack of delivery and what measures are in place to address this. The HDT AP can assist at planning appeals as it sets out the Council's position in this regard and provides useful context.

5 Consultation Undertaken or Proposed

5.1 There is no formal requirement to consult on the Action Plan although engagement with relevant stakeholders is recommended. Views from developers in producing the Housing Land Supply Statement are sought as part of the preparation of the housing land supply and recent representations on the Regulation 19 consultation have also provided useful insight.

6 Implications

Issue	Implications
Corporate Plan	The proposals would align with Priority 1: Building the right homes in the right places and supporting quality jobs for all.
Financial, Resource and Property	The Assessment has been carried out within the existing Local Plan resources.
Legal, Statutory and Procurement	None anticipated at this time.
Crime and Disorder	None anticipated at this time
Environment and Sustainability	None anticipated at this time
Health and Wellbeing	None anticipated at this time

Risk Management and Health and Safety	None anticipated at this time
Equality and Diversity	None anticipated at this time
Privacy and Data Protection	None anticipated at this time

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Swale Borough Council Housing Delivery Test Action Plan 2021

8 Background Papers

None