

Rother District Council

Report to - Planning Committee
Date - 12 September 2019
Report of the - Executive Director
Subject - Housing Delivery Test Action Plan

Recommendation: It be **RESOLVED:** That the report be noted.

Head of Service: Tim Hickling

Introduction

1. The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether Local Planning Authorities (LPAs) are building enough homes to meet their housing need.
2. The HDT, which was published in February 2019, compares the number of new homes delivered over the previous three years with the authority's housing requirement. The result of the HDT will be used to determine the buffer to apply in future housing land supply position statements and whether the presumption in favour of sustainable development should apply.
3. The National Planning Policy Framework (NPPF) states that *'the Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results'*¹.

The HDT Results

4. The methodology for calculating that HDT can be found in the 'Housing Delivery Test measurement rulebook'². Against a requirement of 1,008 dwellings over the last three years, Rother delivered 697 net dwellings with a result of 69%. The calculation is set out in the table below:

Core Strategy Plan Target:	5,700 Dwellings (2011-2028)
Divided by number of years in the Plan:	17 Years
	5,700 / 17 = 335.3 (Ministry of Housing, Communities and Local Government has rounded up to 336 dwellings)
Requirement over 3 year period:	336 x 3 years = 1,008
Delivery from 2015-2018 =	697 dwellings
HDT Result:	1,008 / 697 = 69%

¹ Paragraph 215 of the National Planning Policy Framework

² <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

5. Where the results of the HDT indicate that delivery is below 95%, there is a requirement to produce an Action Plan as set out in the NPPF³. The action plan must be in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years. The Action Plan is set out at Appendix 1.
6. The results of the HDT will need to be considered as an additional material consideration within reports on planning applications going forward.

The Action Plan

7. The guidance states that the Action Plan should “*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*”.
8. To ensure the document is as useful as possible, LPAs will need to publish an Action Plan within six months of publication of the HDT measurement. The Action Plan was published on the Council’s website on 19 August 2019 – <http://www.rother.gov.uk/AMR>.
9. The Action Plan itself provides an analysis of the key reasons for the historic under-performance against the district’s housing requirement and identifies the measures the Council intends to undertake to increase the delivery of new housing in Rother District. It sets out the actions that the Council is currently engaged in, in order to facilitate the delivery of housing and also sets out the further steps that it considers appropriate to undertake going forward to assist increased delivery of housing.
10. The analysis set out in the Action Plan considers housing supply needs and delivery, the local housing market and development and activity, as well as demand side issues. The Plan goes on to set out a number of responses and key actions going forward, including but not limited to:
 - a. giving priority to completing the Development and Site Allocations Plan and the production of Neighbourhood Plans, taking account of revised NPPF;
 - b. an early review of the Local Plan (Core Strategy) be prioritised, taking account of revised NPPF especially given the Government’s likely expectation of substantially more housing;
 - c. proactively investing in infrastructure; and
 - d. setting up a ‘Landowners Forum’.
11. The Council recognises that delivering growth is complex. Whilst a number of the actions identified in this Action Plan are solely within the remit of the Council to resolve, to successfully respond to the challenge of increasing, and then maintaining housing delivery the Council will also need the support and co-operation of those involved in delivering homes, including landowners and house builders.
12. Success of the actions set out within the Plan will be monitored in subsequent years through further Action Plans and/or the Council’s Local Plan Monitoring Report.

³ Paragraph 75 of the National Planning Policy Framework

Conclusion

13. The HDT result for the District was published in February 2019 demonstrating a result of 69% and requiring the production of an Action Plan within six months of the published result. The Action Plan itself provides an analysis of the key reasons for the historic under-performance against the district's housing requirement and identifies the measures the Council intends to undertake to aim to increase the delivery of new housing in Rother District.

Dr Anthony Leonard
Executive Director

Risk Assessment Statement

The requirement to publish the Action Plan within six months of the publication of the HDT result is set out in the Planning Practice Guidance; publication of the Plan in August 2019 fulfils this requirement. Whilst it is understood that there is no penalty to not producing the Action Plan, the Plan is a positive step towards understanding the barriers to housing delivery in the District and sets out the Council's proposed actions and role increasing delivery.