

## Rother District Council

<b>Report to:</b>	Planning Committee
<b>Date:</b>	15 July 2021
<b>Title:</b>	Publication of Housing Delivery Test Action Plan - 2020 Measurement
<b>Report of:</b>	Tim Hickling, Head of Service – Strategy and Planning
<b>Ward(s):</b>	All
<b>Purpose of Report:</b>	To present the findings of the Housing Delivery Test Action Plan 2020.
<b>Officer Recommendation(s):</b>	It be <b>RESOLVED:</b> That the report be noted.

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### 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 January 2021, 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'*<sup>1</sup>.

### The HDT Results

4. The methodology for calculating that HDT can be found in the 'Housing Delivery Test measurement rulebook'<sup>2</sup>. Against a requirement of 1,035 dwellings over the last three years, Rother delivered 670 net dwellings with a result of 65%.
5. The District's HDT has been assessed against the Core Strategy average annual housing figure of 335 dwellings for the first two years of the measurement, as the Core Strategy was adopted in September 2014 and is therefore valid up to September 2019. The third year of the measurement (2019/20) is assessed against a combination of both the Core Strategy annual average requirement and the Local Housing Need figure. A one month reduction has also been applied to the 2019/20 year by the Government. This reduction has been stated to account for the disruption to local authority

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<sup>1</sup> Paragraph 215 of the National Planning Policy Framework

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

planning services and the construction sector caused by COVID-19 pandemic and subsequent national lockdowns.

6. 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 NPPF<sup>3</sup>. 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.
7. Where the results indicate that delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of assessing the Council's five-year housing land supply.
8. Where delivery has been less than 75% of the housing requirement, the NPPFs presumption in favour of sustainable development will apply.
9. 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**

10. 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*”.
11. 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 should therefore be published on the Council's website by 19 July 2021 at: <http://www.rother.gov.uk/AMR>.
12. 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 and also sets out the further steps that it considers appropriate to undertake going forward to assist increased delivery of housing.
13. 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<sup>4</sup>, including but not limited to:
  - a) giving priority to completing the new Local Plan 2019-2039, with an emphasis on progressing the Housing and Economic Land Availability Assessment (HELAA) which will identify suitable land for development and provide the basis for the new Local Plan's housing and economic site allocations;
  - b) supporting the delivery of housing through the Council's Local Housing Company, Alliance Homes (Rother) Ltd.;
  - c) proactively investing in infrastructure;
  - d) setting up a 'Landowners Forum'; and

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<sup>3</sup> Paragraph 75 of the National Planning Policy Framework

<sup>4</sup> See paragraphs 3.26 - 3.32 on page 27 of the HDT Action Plan.

e) granting of planning permissions on site allocations.

14. 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.
15. 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.

## Conclusion

16. The HDT result for the District was published in January 2021 demonstrating a result of 65% and requiring the production of an Action Plan within six months of the published result.
17. The HDT result also requires that the Council includes a 20% buffer in its five-year housing land supply position statements and apply the NPPFs presumption in favour of sustainable development.
18. The results of the HDT will need to be considered as an additional material consideration within reports on planning applications going forward.
19. 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.

<b>Other Implications</b>	<b>Applies?</b>	<b>Other Implications</b>	<b>Applies?</b>
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	Consultation	No
Environmental	Yes	Access to Information	No
Sustainability	Yes	Exempt from publication	No
Risk Management	No		

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Appendices:	Appendix 1 – Housing Delivery Test Action Plan
Relevant Previous Minutes:	None
Background Papers:	Housing Delivery Test Action Plan 2020
Reference Documents:	National Planning Policy Framework Planning Practice Guidance