

Classification: Public

Key Decision: No

Gravesham Borough Council

Report to: Cabinet
Date: 9 September 2019
Reporting officer: Planning Manager (Policy)
Subject: Housing Delivery Action Plan

Purpose and summary of report:

The following report seeks Cabinet approval of the Housing Delivery Action Plan, attached as Appendix 2.

The Housing Delivery Action Plan is a requirement of the Government's new Housing Delivery Test as set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Where a local planning authority has delivered less than 95% of its housing requirement over the previous three years, they are required to produce an action plan that assesses the causes of under delivery and identifies actions to increase delivery in future years.

MHCLG's 2018 Housing Delivery Test measurement published 19 February 2019 identifies that the Council has only delivered 64% (622 homes) of our housing requirement (975 homes) between 2015-18.

Recommendations:

1. Cabinet members are requested to approve the Housing Delivery Action Plan (Appendix 2) prior to its publication.

1. Background

- 1.1 In response to the national housing crisis, the Government published the Housing White Paper 'Fixing our broken market' in February 2017. The White Paper set out the Government's plans to reform the housing market and boost the supply of new homes in England. The proposed measures covered planning for the right homes in the right places, how to build homes faster and how to diversify the housing market.
- 1.2 Importantly, it proposed to hold local authorities to account for the number of new homes delivered through the introduction of a new Housing Delivery Test. The test would show whether the number of homes being built is below the required number of homes needed in that area. The test would provide a mechanism for establishing the reasons why there has been under delivery and providing a mechanism for setting out how this under delivery can be addressed.

- 1.3 The Government reinforced its objective to significantly boost the supply of new homes and making local planning authorities more accountable for delivery in their areas by publishing:
- a revised National Planning Policy Framework (NPPF) (July 2018),
 - the Housing Delivery Test Measurement Rule Book (July 2018),
 - updated Planning Practice Guidance (PPG) (September 2018), and
 - the Housing Delivery Test: 2018 Measurement Technical note (February 2019).
- 1.4 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book. It measures the number of net homes delivered against the number of homes required over a rolling three-year period.

2. Housing Delivery Test

- 2.1 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book. At present, our housing delivery is measured by reviewing how many homes have been built out, over the preceding three financial year periods (2015-2018) against the housing target in the adopted Local Plan Core Strategy.
- 2.2 If Local Authorities do not pass the Housing Delivery Test there are the following sanctions:
- The 'presumption in favour of sustainable development must be applied to planning applications if the test result is less than 45% in 2019, increasing to 75% from 2020 onwards, this means that proposed developments should be granted planning permission unless:
 - I. policies within the NPPF that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development or
 - II. the adverse impacts of the development "significantly and demonstrably" outweigh their benefits
 - A requirement to add a 20% buffer to the Council's 5-year land supply of deliverable housing sites if delivery falls below 85% (this is to improve the prospect of achieving the planned supply); and
 - A requirement to prepare a Housing Delivery Test Action Plan if delivery falls below 95% to assess the causes of under delivery and identify actions to increase delivery in future years.
- 2.3 Sustainable development is defined in the NPPF as balancing the following three objectives:
- economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and

improved productivity; and by identifying and coordinating the provision of infrastructure;

- social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

2.4 The Housing Delivery Action Plan has had a mixed reception. For some it is a proactive tool for local planning authorities to consider what actions might be available to enhance the delivery of homes whilst others regard it as an unfair imposition when local planning authorities do not deliver homes directly. Previous approaches by Government have taken the form of rewarding local planning authorities for completions (New Homes Bonus) or for permissions granted (Planning Delivery Grant) or for both housing delivery and better planning (Housing and Planning Delivery Grant).

2.5 It is worth noting that there is no requirement to carry out public consultation on the Housing Delivery Action Plan.

3. Gravesham

3.1 It is intended that the Housing Delivery Test results will be published by Government each year, making them publicly available. The date is expected to be November each year, however, the results for the current period were only published on 19 February 2019. The results covered the period 2015 – 2018. For the period of 2015-2018, the Council has scored 64% in the Housing Delivery Test. This result means the Council is required to produce an Action Plan as per the requirements of the NPPF. The Action Plan analyses the causes of under delivery and demonstrates the Council's commitment to responding positively to the challenge of increasing housing delivery.

3.2 The NPPF requires local planning authorities to demonstrate a 5-year supply of deliverable housing land plus a buffer depending on the circumstances the local authority falls within. The Housing Delivery Test result means Gravesham is required to add a 20% buffer to improve the prospect of achieving the planned supply.

3.3 We understand that a total of 108 authorities scored under 95%, and will now have to produce an action plan. Of these, 86 councils have delivered under 85%, which means they will be required to have an additional 20 per cent buffer on their land supply, compared to the five per cent that applies to all councils.

3.4 For Gravesham, as the Gravesham Local Plan Core Strategy was adopted in September 2014, the housing requirement for November 2018 / February 2019 is taken from that document which is considered up to date unless identified otherwise as part of its five-year review.

4. Housing Delivery Action Plan

- 4.1 Gravesham in keeping with other parts England and especially the South East is experiencing a housing crisis, affordability is worsening and simplistically put a lack of housing supply means that prices are still rising. At present the Council is not able to identify enough land supply to meet the Government's five year supply target (4.39 years). Nor meet its own target set out in GBC's Local plan Core Strategy.
- 4.2 This Action Plan outlines what the Council is doing to address this, and these actions can be summarised at a high level as:
- 4.3 We are simplifying and streamlining Development Management, with greater transparency and efficiency measures. With better guidance for the public and improved advice on our website. Reducing the use of conditions, with positive decision taking.
- 4.4 This is on top of successful actions already taken, that are now bearing fruit. The improved use of technology, moving to become paperless and reducing the need for lengthy reports. The use of a Design Review Panel to improve the quality of development is assisting developers in producing better schemes.
- 4.5 We are looking to bring forward affordable housing at a number of sites i.e. Albert Murray Close, Arnold Avenue, Barr Road, Constable Road / Rembrandt Drive, Mark Square Garages St Hilda's, St Patricks Gardens, Valley, Drive, Whitehill Road, Wilberforce Way. In addition the Council is considering the merits of creating an arm's length management body to increase housebuilding rates, coupled with this the Council is reviewing its housing stock to identify opportunities for intensification.
- 4.6 The Council is actively working to improve the perception of the Borough, and seeking to capitalise on regeneration opportunities within and around Gravesend Town Centre whilst achieving place-making and economic objectives. We are working with EDC, KCC and Homes England to bring forward brownfield sites.
- 4.7 To overcome supply side constraints, the Council is creating a Development Sites Implementation Group, to work with stakeholders and developers, looking to identify and overcome, where practicable, impediments to delivery. Reducing the time between permission and build.
- 4.8 Recognising low levels of GVA the Council is working to stimulate the local economy and to improve incomes in the borough, directly through a review of GBC's economic development offering and through our SELEP and KMEP membership and activity. Based on concerns raised by residents and members the Council is also working with partners and identifying opportunities for improving infrastructure and service provision. This includes exploring other avenues of funding.

5. Alternatives

- 5.1 The alternative is not to publish the Housing Delivery Action Plan

- 5.2 There is no requirement to get a Housing Delivery Action Plan checked or "signed off" in any way, nor to submit it to the government. Councils are required to publish them, with appropriate signposting, on their own website.

6. Next steps

- 6.1 Due to the nature of the Borough's land supply the Housing Delivery Action Plan will need to be kept under review. Work is being undertaken by Officers on a regular basis to identify why major sites have stalled or to identify any issues which may be impeding delivery, with a view to working with developers to overcome these issues. This work will continue and work on the Local Plan is being expedited as the Housing Delivery Action Plan on its own will not address the land supply issues in the Borough.

7. BACKGROUND PAPERS

- 7.1 Anyone wishing to inspect background papers should, in the first place, be directed to Committee & Electoral Services who will make the necessary arrangements.

IMPLICATIONS	APPENDIX 1
Legal	<p>Paragraph 75 of the National Planning Policy Framework (2019) provides that “where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, 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”. The Council has not met its target for 2015-18 and as such has triggered the need to prepare an action plan.</p> <p>The Planning Practice Guidance (PPG) states that “any area may wish to produce an action plan as a matter of good practice or to identify processes to exceed housing requirements and support delivery”.</p> <p>The Housing Delivery Action Plan is not a statutory document and therefore does not require independent examination or formal approval.</p> <p>There is no legal obligation to publicly consult on the Housing Delivery Action Plan.</p> <p>The Housing Delivery Action Plan may be considered a material consideration in the determination of planning applications.</p>
Finance and Value for Money	<p>Upon publication of the Housing Delivery Action Plan officer time will be required to continue with the actions identified in the document, including delivery and monitoring of the aims, objectives and actions as well as the publication of the document on the website. Associated staff time and costs will be managed within the current establishment and existing service budgets.</p> <p>Any costs resulting from delivering the Housing Delivery Action Plan will be funded from existing services and budgets. This includes any annual updates in line with national planning policy as outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).</p>
Risk Assessment	<p>There is no requirement to get a Housing Delivery Action Plan checked or "signed off" in any way, nor to submit it to the government. Councils just need to publish them, with appropriate signposting, on their own website.</p>
Data Protection Impact Assessment	<p><i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i></p> <p>a. Does the project/change being recommended through this paper involve the processing of personal data or special category data or criminal offence data? A definition of each type of data can be found on the Information Commissioner’s Office website via the above links.</p> <p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? N/A - the answer to question a. is 'No.'</p> <p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at gdpr@medway.gov.uk.</p>

Equality Impact Assessment	a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No
	b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. No - N/A
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
Corporate Plan	Strategic Objectives 1,2, 3 and 4
Crime and Disorder	There are no Crime and Disorder considerations pertaining to this report.
Digital and website implications	Subject to approval, the Council's website will be updated with the Housing Delivery Test Action Plan.
Safeguarding children and vulnerable adults	There are no "safeguarding children and vulnerable adults" implications pertaining to this report.