

CABINET

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HOUSING DELIVERY TEST ACTION PLAN

Portfolio Holder: Councillor Jane Chitty, Portfolio Holder for Planning,
Economic Growth and Regulation

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Summary

This is the Council's third Housing Delivery Test Action Plan. It has been prepared in response to the publication of the Housing Delivery Test results in January 2021. Despite record high rates of housebuilding in Medway in 2019/20, with 1,130 new homes built, development in recent years has not met the defined levels of housing needed. The Action Plan considers the factors influencing housebuilding in Medway, and actions that the Council can promote to boost the delivery of new homes.

1. Budget and policy framework

1.1. The Government requires councils to prepare Housing Delivery Test action plans where rates of housebuilding fall beneath defined targets. This decision is within the Council's policy framework. The report has been prepared using existing resources in the Planning Service.

2. Background

2.1. Medway is committed to providing new homes to meet the needs of our growing and changing communities, The Council works corporately to plan and facilitate sustainable growth, attract investment, and directly deliver new homes. Our ambitions have seen success in boosting confidence in development in Medway. In 2019/20, 1,130 new homes were built in Medway. This was the highest rate of housebuilding that has been seen since Medway Council was established over 20 years ago. This significant uplift in housebuilding reflects the Council's commitment to deliver growth that benefits all our communities.

2.2. The Government has made the delivery of housing a key aim of its administration. Ongoing reform of the Planning system has sought to boost the supply of housing. This has included the introduction of the Housing

Delivery Test (HDT) that measures the delivery of housing in a local authority area against its defined level of housing need. The test compares the net number of homes delivered over the preceding three years to the housing requirement for the same period. The intention is to encourage local planning authorities to take action to address the causes of low rates of housing delivery.

- 2.3. This is Medway Council's third Housing Delivery Test Action Plan (HDTAP). The Council has produced the action plan in response to the Housing Delivery Test (HDT) results published in January 2021 because delivery was below the 95% threshold.
- 2.4. The latest HDT measurement showed that rates of housebuilding delivered in Medway in the preceding three years were 55% of the defined housing requirement, calculated using the method in the Housing Delivery Test Rule Book. This result was an increase from 46% in the previous year. This means that all measures associated with the HDT will be imposed. Medway Council is required to create an action plan, apply a 20% buffer to the five year housing land supply and apply a presumption in favour of sustainable development when determining planning applications. This will apply until the next annual HDT measurement.
- 2.5. The National Planning Policy Framework ([NPPF](#)) requires local planning authorities (LPAs) to apply a presumption in favour of sustainable development to decision making if the development plan policies are out of date, unless there are other material considerations to outweigh this. It also requires LPAs to apply this if their housing delivery falls below a certain level. There was a transition arrangement in place for the first two years of the HDT measurement with the level of delivery needing to be above 25% in year 1 and 45% in year 2 but it is now at 75% so the presumption applies to Medway in this respect as well. The Head of Planning has provided training to members on the implications of the Presumption in Favour of Sustainable Development in relation to planning decisions.

Table 1: Housing Delivery compared to Housing Requirements

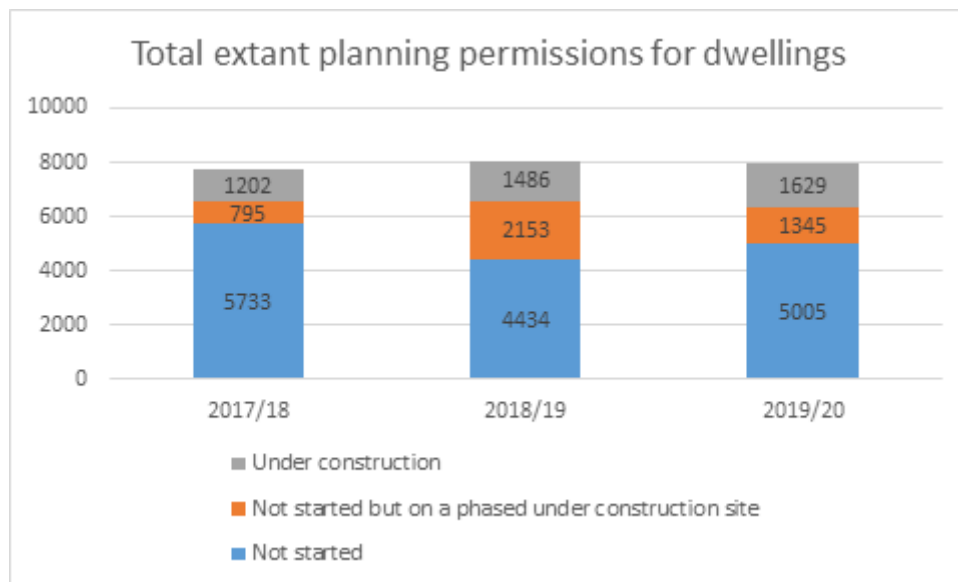
	2017-18	2018-19	2019-20	Total	Percentage result
Number of homes required	1,334	1,672	1,550	4,556	55%
Number of homes delivered	669	647	1,181	2,498	

- 2.6. Table 1 sets out the published Government measurement which includes wider categories of housing, such as student accommodation, care homes, and mobile homes. The Council reports on other forms of communal accommodation separately. Our count for new homes in 2019/20 built in Medway was 1,130. This was a dramatic increase in the last year in the net number of homes delivered up from 647 in 2018/19. This was the highest

level of housebuilding in Medway since its inception in 1998. However, this achievement was still below the level of identified housing need. The gap between rates of housebuilding and the defined housing needs requirement highlights the challenging targets set by Government, using the Standard Method to calculate housing need for local authorities. There has been progress on key regeneration sites but also growth in smaller urban sites and in suburban and rural locations. This signals a change in the progression of sites in Medway and the Council is confident that the increased level of delivery will be sustained in 2020/21. Monitoring information held by the Planning Service shows an increase in rates of housebuilding in recent years, as well as a significant pipeline of sites with planning permission.

- 2.7. The following graphic shows the number of dwellings under construction and not started up to 2019/20. There are some sites that fall into both categories, for example, when the site is phased and not all phases are under construction.

Figure 1: Status of Residential ‘Pipeline’ Sites



- 2.8. On average, the number of new homes being permitted has increased in the last five years totalling 5,518 dwellings compared with 2,817 in the preceding four years. However, there have not been enough permissions granted to meet the current high level of local housing need.
- 2.9. The report also considers how Medway will perform in future HDTs based on the housing trajectory published in the Council’s Authority Monitoring Report (AMR) 2019/20. The projected results indicate that Medway will pass the HDT in 2023. This is a year later than projected in last year’s action plan. Although Medway achieved its highest delivery in 2019/20, the trajectory was reviewed, in line with monitoring processes, and this has meant projected delivery has been pushed back. This was mainly due to the Covid-19 pandemic which has made it difficult to assess future delivery, both for the Council and developers,

but also due to the first lockdown and ongoing social distancing being maintained on sites.

2018	2019	2020	2021	2022	2023	2024
47%	46%	55%	61%	87%	102%	117%
1 st action plan and 20% buffer	2 nd action plan and 20% buffer	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan, 20% buffer and presumption in favour of sustainable development	Action plan and 20% buffer	No imposed measures	No imposed measures

Scope of Action Plan

2.10. The HDT Action Plan is set out at Appendix 1. The content:

- Considers Medway’s development context and reviews historic performance on housing delivery.
- Explains measures the Council has already adopted to monitor and encourage housing delivery.
- Reviews actions supporting delivery from the last plan and their impact
- Has gathered evidence on strategic sites with planning permission to understand the build out rate and the barriers that are preventing these homes being built (and at a quicker rate).
- Proposes measures to contribute to increasing the amount and speed of delivery of new housing.
- Sets out measures to continue monitoring housing delivery and understanding factors influencing delivery rates.
- Includes a timetable to review the plan.

2.11. Of particular note in the Action Plan is the Council’s pro-active and coordinated work in attracting investment and bringing forward sustainable growth in Medway. This includes maximising regeneration and economic growth, direct delivery of homes through the Medway Development Company (MDC) and via its Housing Team, progressing the Local Plan and engaging with developers and landowners, and the placemaking initiatives, such as the City of Culture bid.

2.12. In many areas, the Council has been proactive in taking steps that help promote housing delivery. There is much to be applauded and continued but we have also identified some areas with scope for improvement where the Council can take action to address under delivery of housing. These are included in section 3 of the Action Plan. Some actions will see immediate results. Others will take longer to show impact but are essential for medium to long term delivery.

Key conclusions from the analysis:

2.13. There has been an increase in the number of planning permissions for dwellings in recent years, but this is currently not at a high enough level to

deliver the level of local housing need identified in the government methodology. The defined local housing need has increased significantly, and the Council has taken action to permit more schemes including larger schemes on greenfield sites, outside of the Local Plan, where it can be demonstrated that development is sustainable. This is now having a positive effect on the number of new homes being built. This needs to be sustained to increase the rates of delivery and pass the HDT in coming years.

- 2.14. A key action is publication of the new Local Plan as it will provide the spatial strategy to meet the local housing need. There has been detailed work carried out on site assessment to demonstrate that development can be delivered, is viable and can come forward in a timely way to provide for a five-year housing land supply (5YHLS). This is shown in the most recent Strategic Land Availability Assessment (SLAA) and Brownfield Land Register.
- 2.15. The analysis shows that communication with stakeholders through ongoing engagement activities is an important part of Medway's influence over the delivery of housing.
- 2.16. There is a breadth of work happening across the Council that will have a positive impact on the delivery of housing including within the Planning service. The delivery of projects such as the Housing Infrastructure Fund will ensure the Council can continue to meet its regeneration aspirations and housing delivery whilst supporting the development sector to continue delivering in Medway.

3. Options

- 3.1. The Council has considered a broad range of criteria and potential actions in drawing up the content of the HDT Action Plan. There are limited options to consider in relation to the publication of the HDT Action Plan. Government requires the publication of the HDT Action Plan by late July 2021. At a time when the Council is without an up-to-date Local Plan, and experiencing significant speculative development pressures on greenfield sites, the Action Plan is seen as a useful measure to support the Council's work. The Council has used extracts from earlier Action Plans in supporting planning reports and appeal statements. Work on the 2021 Action Plan is being coordinated with work on the new Local Plan, particularly in defining the five-year land supply and delivery strategy.

4. Advice and analysis

- 4.1. It is advised that the Council publishes the HDT Action Plan as presented in Appendix 1 to meet the government requirements and to confirm the measures being taken by the Council to support housebuilding in Medway.
- 4.2. The new Medway Local Plan is highlighted in the HDT Action Plan as a critical means of boosting housebuilding in Medway. The publication of the draft Local Plan will be informed by a comprehensive Sustainability Appraisal.

5. Risk management

- 5.1. The HDT Action Plan has considered a wide range of factors that can influence rates of housebuilding in Medway. There are a number of external risks, over which the Council has limited control, such as the availability of mortgage products. However, the Action Plan has focused on those areas where the Council is able to exercise more influence locally, including the work of the Planning Service and corporate actions to attract investment and boost confidence in Medway.

Risk	Description	Action to avoid or mitigate risk	Risk rating
Council fails to publish 2021 HDT Action Plan	Failure to meet government requirements	Preparation of HDT Action Plan	E3
Delay in publication of Local Plan	Implications for housing land supply	Careful programme management to progress publication of draft plan.	C2
Housebuilding does not meet levels set by Government.	Presumption in favour of sustainable development applies, so 'tilted balance' given to development proposals, which may not accord with Council's spatial strategy.	Production of Local Plan and granting consents for proposals that represent sustainable development in advance of plan.	A3

6. Consultation

- 6.1. There is no requirement to consult on the HDT Action Plan. The Council regularly engages with the development sector and has included information gathered from developers in preparing the HDT Action Plan. This has included seeking updates from developers on planned housing delivery rates. The Council will publicise the HDT Action Plan in meetings with developers, and welcome comments.

7. Climate change implications

- 7.1. The HDT Action Plan reports on the measurement of the HDT and sets out actions to promote housing growth. This does not directly address climate change matters. However, there are specific considerations on climate change in the wider work in preparing the Local Plan and in the determination

of planning applications in the context of the Presumption in Favour of Sustainable Development.

8. Financial implications

- 8.1. The production of the HDT Action Plan has been carried out using staff resources within the Planning Service.

9. Legal implications

- 9.1. The Housing Delivery Test Action Plan meets the requirements of the National Planning Policy Framework, 2019. The Presumption in Favour of Sustainable Development is set out in the NPPF, 2019.

10. Recommendations

- 10.1. The Cabinet is requested to approve the publication of the Medway Housing Delivery Test Action Plan, 2020, as set out at Appendix 1.

11. Suggested reasons for decision

- 11.1. Cabinet is requested to approve the publication of the Medway HDT Action Plan, 2021, to meet requirements set by Government.

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Appendices

Appendix 1: Medway Housing Delivery Test Action Plan, July 2021

Background papers

None