HOUSING DELIVERY ACTION PLAN

1. RECOMMENDATIONS

- 1.1 That the Cabinet agree
 - to publish the Housing Delivery Action Plan (HDAP) for 2024, attached as Appendix 1;

2. INTRODUCTION

- 2.1 The Housing Delivery Test (HDT) was introduced by the government in 2018 to ensure that local authorities are held accountable for their role in ensuring new homes are delivered. The HDT is an annual measurement of housing delivery published by the government. It compares the total amount of housing delivered in a plan-making area over the preceding three financial years, against the number of homes required in that area over the same rolling three-year period.
- 2.2 The results of the HDT are published annually. Paragraph 79 of the National Planning Policy Framework (NPPF) (December 2023) states that "to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission." The three consequences of the Housing Delivery Test results are set out in the NPPF and summarised below:
 - Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the three previous 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.
 - Where the Housing Delivery Test indicates that delivery has fallen below 85% of the housing requirement over the previous three years, the authority's five-year housing supply should include a buffer of 20%, in addition to the requirement to prepare an action plan.
 - In addition, where the Housing Delivery Test indicates that delivery has
 fallen below 75% of the local planning authority's housing requirement over
 the three previous years, the presumption in favour of sustainable
 development will apply to decisions for planning applications involving the
 provision of housing. This means that the policies which are most important
 for determining the application are deemed out-of-date.

3. BACKGROUND

3.1 On 19 December 2023, the government published the results of the 2022 Housing Delivery Test Measurement (this Measurement covers the three-year period 2019/20 to 2021/22)¹. New Forest District Council (hereafter 'Council') achieved a score of 92% against the requirement for the period. This score is above the 75% threshold below which the 'presumption in favour of sustainable development', as set out in paragraph 11(d) of the NPPF, applies but is below the pass mark of '95%'.

¹ https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement

- 3.2 As a consequence of delivery being beneath the pass mark, the Council has prepared this Housing Delivery Action Plan (HDAP) to positively respond to the challenge of increasing its housing delivery.
- 3.3 The purpose of this HDAP is:
 - To provide an analysis of the key reasons for the under-delivery of new homes in the Plan Area² against its housing requirement; and
 - To identify the actions the Council intends to undertake to increase and accelerate the delivery of new housing in the Plan Area; and
 - To confirm the monitoring arrangements for the HDAP.

4. NEW FOREST DISTRICT (OUTSIDE THE NATIONAL PARK) HOUSING DELIVERY ACTION PLAN (HDAP)

- 4.1 Following the introduction, the HDAP is divided into two further sections. Section 2 of the HDAP looks at the causes of the current 'under delivery' of new homes in the Plan Area and identifies key local and national issues which have affected and continue to have implications for housing delivery. These include:
 - **Nutrient issues:** Before strategic mitigation solutions were identified, the requirement for residential development to be nutrient neutral delayed the issuing of planning permissions and sites being brought forward which has had a knock-on effect on housing completions.
 - Macro-economic uncertainty: These include the economic and social impacts of the Covid-19 pandemic, the Ukraine war, stubbornly high inflation, and rising build costs (both for materials and labour). Such circumstances combined have the effect of inducing uncertainty and slowing down progress both sites coming forward.
 - Slower than anticipated progress on Local Plan 2016-2036 Part 1: Planning Strategy strategic site allocations: The strategic sites have not come forward in line with the timescales originally projected when the Local Plan was examined which is contributing to housing targets not being met.
 - Stalled sites: A number of sites that benefit from either longstanding Local Plan allocations or extant planning permissions have stalled or made very limited progress towards being delivered. This has had a negative effect on both the Council's housing land supply and on housing delivery rates.
- 4.2 Section 3 of the HDAP sets out a range of specific actions that the Council will seek to undertake, working with developers and other delivery partners as appropriate, in order to promote and support housing delivery in both the short-term and longer-term. The Council will establish a cross-service Housing Delivery Officer Working Group. Its objective and purpose will be to work through and facilitate implementation of the proposed actions set out in the HDAP in order to support increased housing delivery.
- 4.3 The actions in the HDAP are briefly summarised below:
 - Take a proactive approach to bringing forward existing sites by actively engaging with infrastructure providers, developers and other consultees to seek to

² Plan Area is the area of New Forest District that is outside the New Forest National Park

ensure that development comes forward as soon as possible and continue to ensure that the development capacity of sites is optimised;

- Progress Local Plan Review in accordance with the published Local Development Scheme (LDS);
- Identify (and explore opportunities to bring forward) additional suitable and achievable development sites within built-up areas including Council-owned sites and the exploration of potential regeneration areas:
- Ensure Development Management processes continue to be efficient and effective Continue to ensure that the end-to-end decision-making process is as efficient and effective as possible, providing continuing certainty for all parties involved. Explore with the Planning Advisory Service the potential for independent third-party review of our end-to-end decisionmaking process and to benchmark sector best practice. Continue to refine the Section 106 process working across all Council functions and with delivery partners to reduce the potential for delays in the Section 106 process.
- Support the delivery of strategic solutions to environmental constraints (Habitats Regulations) by preparing and/or updating mitigation strategies and identifying offsetting solutions, and by strategic working on regionally significant issues (in particular those that affect international nature conservation sites engaging the Habitats Regulations); and
- Support affordable housing delivery in particular through the work of the Council's Housing Strategy and Development service.
- 4.4 The HDAP will be reviewed on an annual basis. The Council will monitor the effectiveness of actions themselves, as well as the outcomes (e.g. housing delivery rates and housing land supply). The actions will be updated where necessary and new ones may be added in response to external changes, such as new funding streams, Government initiatives and changes to legislation and/or policy.

5. CONCLUSIONS

5.1 Cabinet is recommended to agree to publish the Housing Delivery Action Plan (HDAP).

6. FINANCIAL IMPLICATIONS

6.1 Although there are no direct quantifiable implications, it is worthy of note that improved housing delivery within the New Forest Planning Area will result in a higher tax base. This in turn leads to increased Council Tax collection to be used to deliver public services by precepting authorities.

7. CRIME & DISORDER IMPLICATIONS

7.1 There are no direct crime and disorder implications from the recommendations in this report.

8. ENVIRONMENTAL IMPLICATIONS

8.1 There are no direct environmental implications from the recommendations in this report.

9. EQUALITY & DIVERSITY IMPLICATIONS

9.1 There are no direct equalities implications from the recommendations in this report.

10. DATA PROTECTION IMPLICATIONS

10.1 There are no direct data protection implications from the recommendations in this report.

11. PORTFOLIO HOLDER COMMENTS

11.1 I believe this Action Plan is a comprehensive document which identifies the reasons for the delay in housing delivery and lists ways this might be addressed. Clearly many factors are outside our control but the actions listed are the best way to speed up housing delivery. Many of the actions in this report are activities that the planning department are already doing to positively promote housing delivery.

For further information contact: Background Papers:

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