

CABINET	DATE 22 September 2021	ITEM NO 5
TITLE Publication of the 2021 Housing Delivery Action Plan	WARD (S) All	
CHIEF OFFICER Director of Regeneration Enterprise & Skills	CABINET MEMBER Regeneration and Good Growth	
DECISION CLASSIFICATION <i>Key Decision</i> <i>Non exempt</i>	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING? Yes	

1. **Decision required**

This report makes the following recommendations to the decision-maker:

- 1.1. Approve the 2021 Housing Delivery Action Plan, attached at Appendix I and agree that the Action Plan be published on the Royal Greenwich website.

2. **Links to the Royal Greenwich high level objectives**

- 2.1. This report relates to the Council's agreed high-level objectives as follows:

- Delivering Homes Through Economic Growth

The Housing Delivery Action Plan sets out how RBG seeks to continue delivering homes in order to meet our housing requirements

3. **Purpose of the Report and Executive Summary**

- 3.1 This report seeks approval of the Housing Delivery Action Plan 2021. Local authorities are required to publish a Housing Delivery Action Plan if housing delivery falls below 95 per cent according to the Housing Delivery Test (HDT) measurement which is published annually. RBG's 2020 HDT result (published in January 2021) was 90 percent. The Housing Delivery Action Plan provides an analysis of past housing

delivery, recognising that the causes of under-delivery are primarily outside the Council's control. It also assesses the future pipeline of permissions/development sites and summarises the measures the Council is taking to facilitate housing delivery, demonstrating RBG's very proactive approach to boosting housing delivery.

4. Introduction and Background

- 4.1 The Housing Delivery Test (HDT) was introduced by the Government via the updated National Planning Policy Framework (NPPF, 2018) as a monitoring tool to demonstrate whether local planning areas are building enough homes to meet their housing requirement. The HDT results are published annually by MHCLG.
- 4.2 The Government's 'Housing Delivery Test Rule Book' and Planning Practice Guidance (PPG) set out the full details of the method for calculating the HDT. The total net housing completions in a local planning authority are submitted to MHCLG by the GLA on an annual basis. These figures are then considered over the previous three-year period to calculate each authority's performance against the HDT.
- 4.3 The planning policy consequences of not meeting the HDT (defined as delivery below 95 percent of the requirement) are set out in the NPPF (paragraphs 73 and 75) and continue to apply until a subsequent HDT measurement is published. Where the HDT for the reporting year indicates that housing delivery over the previous three-year period has fallen below 95% of the housing requirement the Local Planning Authority is required to publish an Action Plan in line with national planning guidance. If delivery falls below 85%, local authorities must also apply a 20% buffer to their 5-year land supply. If housing delivery falls below 75% application of the presumption in favour of sustainable development applies.
- 4.4 RBG's 2019 HDT result (published in February 2020) was 90 percent and a Housing Delivery Action Plan was prepared in accordance with the requirements set out in Planning Practice Guidance (PPG) and was published in September 2020 following its approval by Cabinet on 21st August 2020. RBG's 2020 HDT result (published in January 2021) was also 90 percent, therefore an updated Housing Delivery Action Plan has now been produced. The Housing Delivery Action Plan assesses the

causes of under-delivery and identifies actions to increase delivery in future years.

- 4.5 The Housing Delivery Action Plan does not form part of the Council's statutory development plan. It provides an analysis of past housing delivery and the future pipeline of permissions/development sites, with reference to the 15 year housing trajectory in the most recently published Authority Monitoring Report (AMR), and in addition to identifying actions to increase delivery, it summarizes the package of measures that the Council is already undertaking in facilitating housing delivery.
- 4.6 RBG has an ambitious growth agenda, and is committed to increasing the supply of new homes, especially genuinely affordable homes. RBG is a very proactive borough and the delivery of housing is one of the main priorities as identified within the Council's corporate plan.
- 4.7 The Council granted permission for a net total of 22,087 residential units in the four years between 2015/16 – 2018/19, meaning that the pipeline of permissions can comfortably meet and exceed the London Plan housing targets and that RBG has a ready supply of land for housing delivery. In the 2019/20 reporting year, 3055 completions were recorded as part of the Housing Delivery Test measurement, with 1007 of these on Greenwich Peninsula.
- 4.8 In addition, the Council's direct delivery programme (Greenwich Builds) is and will continue to introduce a significant new source of supply that otherwise would not have come forward. The established pre-application and application service was further strengthened with the securing of an Urban Design Manager at the end of 2019, ensuring the best quality schemes are brought forward.
- 4.9 Joint working is an important aspect of delivery, both in terms of identifying and addressing strategic issues in relation to delivery and in unlocking specific sites for housing development. The council works closely with public sector partners to bring forward necessary infrastructure and with public/private sector partners on strategic sites. While delays to planning permissions being built out are largely outside the Council's control, regular dialogue with developers and other key stakeholders ensures that any unforeseen barriers to delivery are identified as early as possible.

- 4.10 Plan-making also forms an important part of increasing delivery. The Thamesmead OAPF (adopted December 2020) provides a strategic framework to large scale change in the area over the next 20 years, and the new Woolwich Town Centre SPD (consultation expected Winter 2021) has identified how the town centre can accommodate significant additional residential development in a sustainable way. The Site Allocations Local Plan is in preparation, focusing on setting out clear parameters for development on sites that play a role in meeting the objectives of the Core Strategy, and the evidence gathering stage of the review of the Core Strategy with Detailed Policies has commenced.
- 4.11 Overall, RBG is already undertaking a wide range of ongoing actions to encourage and speed up the delivery of housing. The process of preparing the Action Plan has demonstrated the very proactive approach that RBG is taking to boosting housing delivery, and confirmed that causes of under-delivery are primarily outside the Council's control. Accordingly, the Action Plan does not identify measures for improving delivery beyond continuation of those that the Council is already undertaking.

5. Available Options

- 5.1 To agree or not to agree the 2021 Housing Delivery Action Plan for publication.

6. Preferred Option

- 6.1. To agree the 2021 Housing Delivery Action Plan for publication.

7. Reasons for Recommendations

- 7.1. The publication of the 2021 Housing Delivery Action Plan will fulfil the requirements of paragraph 75 of the NPPF.
- 7.2. The 'do nothing' option is not recommended since Planning Practice Guidance requires the publication of an Action Plan within six months of the publication of the HDT.

8. Consultation Results

- 8.1. The Housing Delivery Action Plan has not been subject to public consultation.

9. Cross-Cutting Issues and Implications

Issue	Implications	Sign-off
Legal including Human Rights Act	<p>The delivery of housing in the UK remains a focus for the Government. The Housing Delivery Test (HDT), introduced by the National Planning Policy Framework (NPPF) in July 2018, helps to evaluate how many homes have been built in the area of each local planning authority across England in a consecutive three year period, measured as a percentage of the amount of homes needed as set out in the Local Plan, with 95% constituting a ‘pass’.</p> <p>Paragraph 4.4 of this report refers to the 10% shortfall in housing delivery in the borough, as published in February 2020, and again in January 2021. Where the Housing Delivery Test concludes that actual delivery is below 95% of the housing requirement, the local authority is required to produce a Housing Delivery Action Plan to 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.</p>	Eleanor Penn, Assistant Head of Legal Services, 2 nd September.

	Under the Responsibility for Functions section in Part 3 of the Constitution, Cabinet is authorised to agree the actions recommended at paragraph 1 of this report.	
Finance and other resources	<p>This report requests approval of the 2021 Housing Delivery Action Plan and agreement to publish the Action Plan on the RBG’s website.</p> <p>The adoption of the recommendation to publish the action plan does not have any financial implication to RBG.</p>	<p>Wunmi Akintelure Accountancy Business Change Deputy Manager 24 August 2021</p>
Equalities	The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no apparent equality impact on end users.	<p>Lauren Brown Interim Planning Policy Manager 05 August 2021</p>
Climate change	The decisions recommended through this paper have a remote or low relevance to the actions set out in the Carbon Neutral Plan.	<p>Lauren Brown Interim Planning Policy Manager 05 August 2021</p>

10. **Report Appendices**

10.1. The following documents are to be published with and form part of the report:

- *Appendix A: Housing Delivery Action Plan 2021*

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