

Delegated Cabinet Member Decision Report

Decision Maker and Portfolio area:	Councillor Chadderton, Leader of Oldham Council Cabinet Member for Regeneration and Housing
Date of Decision:	21 September 2022
Subject:	Housing Delivery Test Action Plan (2022)
Report Author:	Elizabeth Dryden-Stuart / Lauren Hargreaves (Strategic Planning and Information, 1672 / 3843)
Ward(s) Affected:	Yes

Reason for the decision: To seek approval for the publication of Oldham Council's Housing Delivery Test Action Plan 2022.

Summary: This report provides an update on the Housing Delivery Test (HDT) position in respect of Oldham. It also sets out an updated position to the previously published Housing Delivery Test Action Plan 2021¹.

The HDT has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures net additional dwellings provided over the past three years against the homes required over the same period. To account for the impact of the Covid-10 pandemic on local planning authority services and the construction sector adjustments have been made to the housing requirement used for the years 2019/20 and 2020/21 as part of the HDT result. The thresholds for consequences for under-delivery remain as per NPPF.

¹ https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan/2135/housing_land

The latest HDT results for 2021 (and which will be reported in the HDT Action Plan 2022) were published 14 January 2022². As per the latest measurement, Oldham has delivered 91% of its housing need over the past three years. This is an improvement from the 2020 result of 80%. This means that the council is no longer required to provide a 20% buffer when assessing its five-year housing land supply. However, as housing delivery was less than 95% of the housing requirement, an action plan still needs to be maintained to assess the cause of under-delivery and identify actions to increase delivery in future years.

This is Oldham Council's third Action Plan, drawn up in response to the Housing Delivery Test: 2021 Measurement, published January 2022. It provides an update on previously published Action Plans and includes information on:

- the root causes for housing under-delivery within Oldham (contained in Part 1); and
- how the council intends to improve delivery (contained in Part 2).

What are the alternative option(s) to be considered? Please give the reason(s) for recommendation(s):

Option 1 – To approve the Housing Delivery Action Plan 2022 for publication in line with the requirements of the Housing Delivery Test: 2021 Measurement results (published January 2022).

Option 2 – To not approve the Housing Delivery Test Action Plan 2022 for publication. This would not comply with the requirements of the Housing Delivery Test Rule Book and the Housing Delivery Test: 2021 Measurement results (published January 2022).

Recommendation(s):

The HDT Rule Book requires authorities whose housing delivery is below 95% of their identified housing need to publish an Action Plan. This is also set out in NPPF. As such, option one is the Preferred Option - To approve the Housing Delivery Action Plan 2022 (Part One and Part Two) for publication in line with the requirements of the Housing Delivery Test: 2021 Measurement results (published January 2022).

² <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

Implications:

What are the **financial** implications?

There are no direct financial implications from approving the Housing Delivery Action Plan for publication.

The number of new homes delivered within Oldham will impact on the overall Council Tax base. Any implications will be reflected in the calculation of the Council Tax Base for future financial years. The Tax Base is prepared and presented to Cabinet for approval on an annual basis prior to consideration of the Council's Revenue Budget and Medium-Term Financial Strategy.

Jamie Kelly
Not applicable

What are the **procurement** implications?

What are the **legal** implications?

Paragraph 76 of the National Planning Policy Framework requires local planning authorities to monitor progress in building out sites that have planning permission and 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 is therefore required to produce an action plan. (A Evans)

Not applicable

What are the **Human Resources** implications?

Equality and Diversity Impact Assessment attached or not required because (please give reason)

This is a technical document and an equality impact assessment is not required

What are the **property** implications

The Action Plan outlines the proposed delivery of the council's ambitions to improve the housing offer within Oldham and increase residential development within Oldham's Town Centre's as part of its future regeneration. This fully aligns with the Council's recently approved and published Housing Strategy, which similarly outlined how the council intends to improve delivery, in order to ensure that we provide a diverse Oldham Housing Offer that is attractive

and meets the needs of different sections of the population at different stages of their lives. Bryn Cooke – Head of Housing and Property Partnerships.

Risks:

Failure to approve the Housing Delivery Test Action Plan 2022 for publication would not comply with the requirements of the Housing Delivery Test Rule Book and the Housing Delivery Test: 2021 Measurement results (published January 2022).

Co-operative agenda

(Mark Stenson)
Publication of an updated Housing Delivery Action Plan will promote working together and openness and democracy values.

Has the relevant Legal Officer confirmed that the recommendations within this report are lawful and comply with the Council's Constitution? Yes

Has the relevant Finance Officer confirmed that any expenditure referred to within this report is consistent with the Council's budget? Yes

Are any of the recommendations within this report contrary to the Policy Framework of the Council? No

List of Background Papers under Section 100D of the Local Government Act 1972:

Title	Available from
Housing Delivery Test Action Plan 2022 Part One – Oldham's Housing Delivery	Strategic Planning and Information
Housing Delivery Test Action Plan 2022 Part Two – Action Plan	Strategic Planning and Information

Report Author Sign-off:	
Date:	

Please list any appendices:-

Appendix number or letter	Description
Appendix A	Housing Delivery Test Action Plan 2022 Part One – Oldham's Housing Delivery
Appendix B	Housing Delivery Test Action Plan 2022 Part Two – Action Plan

1.0 Background:

- 1.1 The Housing Delivery Test (HDT) was introduced by the Government following the publication of the Housing White Paper in 2017 and is set out in National Planning Policy Framework. The HDT measures net additional dwellings provided over the past three years against the homes required over the same period. Results on performance for each local planning authority in England are published annually.
- 1.2 The stated aim of the HDT is to speed up plan-making and housing delivery, especially in areas of high need and/or historic under supply.

2.0 Proposals:

Housing Delivery Test: 2021 Measurement

- 2.1 The latest HDT results for 2021 were published 14 January 2022³ by the Department for Levelling Up, Housing and Communities (DLUHC).
- 2.2 Oldham's Local Plan was adopted more than five years ago. As such, in accordance with the Housing Delivery Test Rule Book Oldham's HDT result is calculated using homes delivered in the previous three years and the housing requirement (for the same three years) based on DLUHC's standard local housing need methodology.
- 2.3 The Covid-19 global pandemic was an unprecedented event with many challenges including temporary disruption to local planning authority planning services and the construction sector. In response adjustments have been made to the HDT result with a one-month reduction to the 2019/20-year housing requirement and a four-month reduction to the 2020/21-year housing requirement. The thresholds for consequences for under-delivery remain as set out in NPPF and are:
 - less than 95% - an Action Plan must be prepared;
 - less than 85% - a 20% buffer of additional deliverable sites for housing on top of their existing five-year housing land supply must be identified;
 - less than 75% - the presumption in favour of sustainable development must be applied⁴.
- 2.4 In line with the published methodology, Oldham's HDT result is calculated using homes delivered in the previous three years and the homes required for those same three years, as set out in Table 1.

³ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

⁴ Presumption in favour of sustainable development means that planning permissions should be granted unless the site is protected by other NPPF policies; or the adverse impacts of a scheme demonstrably outweigh the benefits of granting planning permission.

- 2.5 The number of homes required in 2018/19 was 717. The number of homes required in 2019/20 was 633. The number of homes required in 2020/21 was 461. Therefore, the total number of homes required for 2018-2021 was 1,811 homes.

Table 1: Housing Delivery Test: 2021 Measurement (published 14 January 2022)

	Total number of homes required (2018-2021)	Total number of homes delivered (2018-2021)	Housing Delivery Test:2021 measurement	Housing Delivery Test 2021 consequence
Oldham	1,811	1,645	91%	Action plan

- 2.6 As set out in Table 1, Oldham Council has delivered 91% against the HDT requirement. This is an improvement from the 2020 result of 80%. As set out at paragraph 2.3, this means that the council is no longer required to provide a 20% buffer when calculating its five-year housing land supply. However, as housing delivery was less than 95% of the housing requirement, an action plan still needs to be maintained to assess the cause of under-delivery and identify actions to increase delivery in future years.

- 2.7 The results for Oldham, in the context of other Greater Manchester authorities are set out in Table 2 below.

Table 2: Housing Delivery Test: 2021 Measurement (published 14 January 2022) – Greater Manchester results

GM District	Total number of homes required (2018-2021)	Total number of homes delivered (2017-2020)	Housing Delivery Test: 2020 measurement	Housing Delivery Test 2020 consequence
Bolton	2,028	1,554	77%	Buffer
Bury	1,547	808	52%	Presumption
Manchester	6,715	11,315	169%	None
Oldham	1,811	1,645	91%	Action Plan
Rochdale	1,187	2,003	169%	None
Salford	3,521	10,100	287%	None
Stockport	2,814	2,579	92%	Action Plan
Tameside	1,653	1,510	91%	Action Plan
Trafford	3,493	2,769	79%	Buffer
Wigan	2,385	4,165	174%	None

Oldham's Housing Delivery Action Plan

- 2.8 As outlined above, those authorities who are found to have delivered less than 95% of their housing requirement are required to prepare and publish an Action Plan.
- 2.9 The role of the Action Plan as set out in planning guidance is 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'. Action Plans are intended to be practical documents focused on effective measures aimed at improving delivery. They should be locally specific and underpinned by appropriate evidence, research and local understanding setting out measures intended to stimulate housing delivery.
- 2.10 Oldham's first Action Plan was published in August 2019⁵ in response to the first 2018 HDT result. A further update was published in August 2021 in response to the 2020 HDT result published in January 2021. Earlier versions of the HDT Action Plan can be found online at https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan/2135/housing_land.
- 2.11 This is Oldham Council's third Action Plan, drawn up in response to the Housing Delivery Test: 2021 Measurement, published January 2022. The Action Plan is contained in two parts:
- Part One contains an updated root cause analysis, looking at causes and issues relating to housing under-delivery.
 - Part Two sets out actions and opportunities to address housing delivery issues and improve housing delivery over the short, medium and long term.
- 2.12 Reflecting the housing delivery analysis identified in Part 1 – Housing Delivery Context, Evidence and Root Cause Analysis, the actions aimed at increasing delivery across the borough are structured around the following themes:
- Improving capacity and processes.
 - Increasing the delivery of sites within our housing land supply, in particular on brownfield land
 - Delivery of the council's ambitions to improve and increase the housing offer within Oldham.
- 2.13 A progress update to the actions set out in the 2021 HDT Action Plan is also provided.

⁵ An action plan was required in 2020 however due to competing staff resources this was not prepared.

Engagement

- 2.14 Stakeholder engagement is important to understand issues with delivery as stakeholders, such as developers and registered providers, directly impact the rate of delivery. For the 2019 HDT Action Plan, a developers' forum was held in May 2019 to which representatives from housebuilders, registered providers and planning agents operating within the borough were invited. The forum provided an opportunity to discuss and explore the key reasons for under-delivery of housing and how these may be overcome.
- 2.15 For the 2021 HDT Action Plan, given Covid-19 restrictions in place at the time, a housing delivery developer questionnaire was prepared and sent out to key stakeholders. Whilst limited answers were received, the questionnaire feedback was used to inform the 2021 HDT Action Plan as appropriate.
- 2.16 It has not been possible to undertake engagement to inform preparation of the 2022 HDT Action Plan, however many of the issues raised during the previous engagement exercises continue to be relevant and it is clear that actions put forward in previous Action Plans are having a positive effect given the improved housing delivery test result.

3.0 Conclusions

- 3.1 The HDT Rule Book requires authorities whose housing delivery is below 95% of their identified housing need to publish an Action Plan. This is also set out in NPPF.
- 3.2 This is Oldham Council's third Action Plan, drawn up in response to the Housing Delivery Test: 2021 Measurement, published January 2022. The Action Plan is contained in two parts:
- Part one contains an updated root cause analysis, looking at causes and issues relating to housing under-delivery.
 - Part two sets out actions and opportunities to address housing delivery issues and improve housing delivery over the short, medium and long term.

In consultation with

Executive Director of Place & Economic Growth



Date: 6 Oct 2022