

CABINET MEMBERS DELEGATED DECISION

Open/Exempt		Would any decisions proposed:			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide Need to be recommendations to Council		YES/NO	
	Discretionary/			YES/NO	
	Operational	Is it a Key Decision		YES/NO	
Lead Member: Cllr Jim Moriarty E-mail: cllr.James.Moriarty@West-Norfolk.gov.uk			Other Cabinet Members consulted:		
			Other Members consulted:		
Lead Officer: Alex Fradley (Planning Policy Manager) E-mail: alex.fradley@west-norfolk.gov.uk			Other Officers consulted: Stuart Ashworth (Assistant Director – Planning & Environment); Jemma Curtis (Regeneration Programmes Manager); James Grant (Principal Project Manager); Karl Patterson (Senior Housing Development Officer); Clare Cobley (Housing Development Officer); Claire Dorgan (Senior Planner/ EWG representative); Lee Osler (Office Manager)		
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening	Risk Management Implications YES/NO	Environmental Considerations YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					
Date of publication of report: 13 November 2024			Date decision to be taken: 20 November 2024		
Deadline for Call-In: 27 November 2024					

TITLE: APPROVAL OF HOUSING DELIVERY TEST ACTION PLAN 2024

Summary

This report has been prepared to secure approval of the 2024 Housing Delivery Test (HDT) Action Plan. The HDT Action Plan has been prepared in response to the Government's published 2022 HDT data (December 2023), which has identified the Borough Council as having achieved 90%, below the 95% requirement (thereby triggering the need to prepare an HDT Action Plan).

Recommendation

The Cabinet Member for Planning and Licensing to approve, under delegated powers, the 2024 HDT Action Plan.

Reason for Decision

To approve and permit publication of the Borough Council's 2024 HDT Action Plan, prepared in response to the Government's 2022 HDT data (published December 2023).



1 Background

The National Planning Policy Framework (NPPF), sets out the requirement for Local Planning Authorities (LPAs) to prepare a Housing Delivery Test (HDT) Action Plan, where housing delivery falls below 95% of the LPAs housing requirement over the previous three financial years.

The Ministry of Housing, Communities and Local Government (MHCLG) publishes annual data returns for the HDT, setting out the performance of each LPA. The most recent publication of results was published in December 2023 and covers the period 2019-2022 ([Housing Delivery Test: 2022 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement)). This sets out that the Borough Council's HDT result is 90%. This triggers the requirement for the Borough Council to prepare a HDT Action Plan.

The Borough Council previously published an HDT Action Plan in August 2019. This was followed by a partial update in 2020: [5-year housing land supply and Housing Delivery Test \(HDT\) | 5-year housing land supply and Housing Delivery Test \(HDT\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](https://www.west-norfolk.gov.uk/news/5-year-housing-land-supply-and-housing-delivery-test-hdt-5-year-housing-land-supply-and-housing-delivery-test-hdt-borough-council-of-kings-lynn-west-norfolk). The Borough Council has reviewed these earlier HDT Action Plans in light of the latest available evidence.

The following Departments have been engaged in the preparation of the Action Plan:

- Housing Services (Strategic Housing)
- Regeneration (Economic Development)
- Major Housing Projects (Borough Council's own housing developments)

2 Options Considered

None. Preparation of an HDT Action Plan is required by Government, where housing delivery falls below 95% of the Borough's housing requirement over the previous three years.

3 Policy Implications

Preparation of the HDT Action Plan is required, to demonstrate what the Borough Council is already doing, together with further actions, to bolster housing delivery to meet local housing needs.

4 Financial Implications

None.

5 Personnel Implications

None.

6 Environmental Implications

National planning policy recognises that sustainable development consists of economic, social and environmental objectives. The latter objective requires development "to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy" (NPPF, paragraph 8, December 2023). These national policy



requirements are reflected in the Corporate Strategy 2023-2027, which includes a priority to “protect our environment”.

The HDT Action Plan sets out what the Borough Council is already doing, and could consider doing, to boost housing delivery. It is necessary to ensure that, in seeking to increase housing delivery, the Council maintains its commitments, both to promote beneficial growth and prosperity, while protecting the environment.

7 Statutory Considerations

None. Preparation of the HDT Action Plan is a requirement of national planning policy, although not a statutory requirement.

8 Equality Impact Assessment (EIA)

Pre-Screening Equality Impact Assessment undertaken, demonstrating neutral impacts. Therefore, there is no requirement to undertake a full EIA.

9 Risk Management Implications

The HDT Action Plan has been a requirement of national planning policy since 2018, when the requirement to maintain at least 95% housing delivery against the local housing need for the previous three years (or Local Plan housing requirements, if adopted within the previous 5 years). Local housing need is calculated using the Government’s standard method, with the latest calculations set out in the Action Plan.

If the Borough Council fails to produce a robust HDT Action Plan, there is a risk that undesirable development proposals could be granted on appeal, in response to the Council’s failure to explain how it is working to boost housing supply. The Action Plan is therefore an important tool in resisting inappropriate development, through meeting the Government’s requirement for the Borough Council to prepare a Plan in the event that housing delivery falls below the 95% “pass” figure.

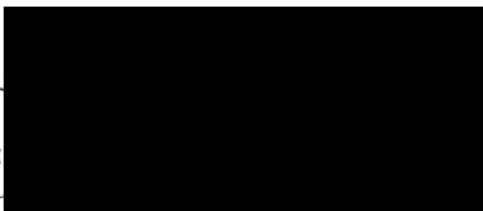
10 Declarations of Interest / Dispensations Granted

None.

11 Background Papers

2024 HDT Action Plan

Signed:



Cabinet Member for: Planning and Licensing

Date: 12/11/24



Stage 1 - Pre-Screening Equality Impact Assessment

Name of policy/service/function	Housing Delivery Test Action Plan 2024				
Is this a new or existing policy/service/function? <i>(tick as appropriate)</i>	New		Existing	X	
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	<p>Since 2018, the Ministry of Housing, Communities and Local Government (MHCLG) has required local authorities to prepare a Housing Delivery Test (HDT) Action Plan, where delivery falls below 95% of the housing requirement over the previous three years.</p> <p>This requirement is set out in the updated National Planning Policy Framework (NPPF), December 2023.</p>				
Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i>	<p>The following Departments (internal consultees) have been engaged in the preparation of the Action Plan:</p> <ul style="list-style-type: none"> • Housing Services (Strategic Housing) • Regeneration (Economic Development) • Project Management 				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p>		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Sex			X	
	Gender Re-assignment			X	
	Marriage/civil partnership			X	
	Pregnancy & maternity			X	
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Armed forces community			X	
	Care leavers			X	
Other (eg low income, caring responsibilities)			X		



Question	Answer	Comments
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	<p>Yes / No</p>	<p>Preparation of the HDT Action Plan is a requirement of national planning policy (NPPF). Its role is positive planning, to identify and explain potential actions that the Borough Council could take to bolster housing delivery, to support the Government's objective of significantly boosting the supply of homes (NPPF, paragraph 60, December 2023).</p>
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	<p>Yes-/ No</p>	<p>The need to ensure delivery of sufficient housing to meet local needs is potentially of benefit to all communities/ groups</p>
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	<p>Yes-/ No</p>	<p>The HDT Action Plan specifically relates to boosting housing delivery. This is a high level monitoring document. Changes to Council policy on affordable housing for example, would be considered and assessed in its own right.</p>
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	<p>Yes-/ No</p>	<p>Actions:</p> <p>None required. However, the reporting within the document may lead to/ be addressed through other Council policies which will be subject to their own EIA.</p> <hr/> <p>Actions agreed by EWG member:</p> <p>.....Claire Dorgan.....</p>
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		
<p>Assessment completed by:</p> <p>Name</p>	<p>Michael Burton</p>	
<p>Job title</p>	<p>Principal Planner (Planning Policy)</p>	
<p>Date completed</p>	<p>24 September 2024</p>	
<p>Reviewed by EWG member</p>	<p>Claire Dorgan</p>	<p>Date 09.10.2024</p>



Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)