

Briefing Note

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The long-awaited Housing Delivery Test Results for 2019 have now been published by the Ministry of Housing, Communities and Local Government.

The Housing Delivery Test compares the delivery of housing in each Local Planning Authority against the required amount whereby delivery of the full amount would result in a score of 100%. The test score is then used to calculate the 'buffer' that is to be added to the housing requirement that is used to inform the 5 year housing land supply calculations.

This is important as under the new guidance, those authorities delivering less than 45% of their requirement, will automatically face the presumption in favour of sustainable development whereby their local planning policies are rendered out of date. Furthermore, in 2020, the threshold for this sanction will rise to 75%, meaning all those authorities delivering less than 75% of their housing requirement will also face the presumption.

For those promoting housing development it is worthwhile considering the potential position in terms of the "presumption" that might apply in November 2020 once the 2020 HDT results are published. Certainly those locations already delivering less than 45% of their housing requirement at present are unlikely to improve, while there are a further 46 LPA's which are presently delivering below the 75% threshold that will be applied to the 2020 HDT results, which without improvements in delivery this last year (2019/20) will also be subject to the presumption from November 2020 onwards.

As described at paragraph 11 of the NPPF, the presumption in favour of sustainable development means applications should be granted unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole**

Of the 327 LPA's (including one development corporation) the following 8 authorities are delivering less than 45% of their housing requirements, and as such the presumption in favour of sustainable development currently applies and is also likely to apply when the HDT test rise from 45% to 75%:

- Eastbourne
- Basildon
- Three Rivers
- Havering
- City of London
- Thanet
- North Hertfordshire
- New Forest

The 46 LPA's listed below are delivering less than 75% of the HDT and unless delivery has improved in 2019/20 these will also be subject if they continue delivering at the same rate, under in 2020 all the authorities delivering less than 75% of the requirement will face the presumption in favour of sustainable development:

- Ipswich
- Medway
- Calderdale
- Epsom and Ewell
- Epping Forest
- Tandridge
- Barking and Dagenham
- Southend-on-Sea
- Warrington
- Brentwood
- Castle Point
- Worthing
- Haringey
- Adur
- Kensington and Chelsea
- Bolton
- Elmbridge
- Gedling
- Trafford
- Sandwell
- Gateshead

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- Redbridge
- Spelthorne
- Bury
- Isle of Wight
- Erewash
- Islington
- St Albans
- Chesterfield
- Oldham
- Bournemouth
- East Cambridgeshire
- Thurrock
- Braintree
- Arun
- Brighton and Hove
- Bromsgrove
- Oxford
- Purbeck
- Rother
- Watford
- North Dorset
- Sevenoaks
- Welwyn Hatfield
- Poole
- Stockport

Finally, there are a further 27 authorities currently delivering between 75-85% of their requirement, however, there is still the possibility that for some even a small decrease in delivery for the 2019/20 period would bring them under the 75% HDT in November and the presumption would apply. These include:

- Gravesham
- North Lincolnshire
- Tameside
- Tower Hamlets
- Slough
- Wirral
- Enfield
- Great Yarmouth
- Newham
- Rochford
- Rossendale
- Swale
- Kingston upon Thames
- North Somerset
- Staffordshire Moorlands
- Herefordshire, County of
- Walsall

- Broxbourne
- York
- Kirklees
- South Kesteven
- Guildford
- King's Lynn and West Norfolk
- Wealden
- West Somerset
- Hastings
- Rotherham

Lastly we have noted that some LPA's have been "finding" completions and adding them into their returns for the last year as a result of re-examining data bases or more thorough site visits. It is not always clear that these completions have actually taken place in the period of the completed return. As such careful investigation of any abnormal completion rates for single years should be undertaken.

DLP Planning Ltd and its Strategic Planning & Research Unit (SPRU) have extensive experience in assessing the five-year supply position and objectively assessed housing need of local planning authorities, using the most up to date sources and modelling. Such assessments are often critical to the successful promotion of sites for residential development.