

**TONBRIDGE & MALLING BOROUGH COUNCIL**  
**PLANNING and TRANSPORTATION ADVISORY BOARD**

**01 March 2022**

**Report of the Director of Planning, Housing and Environmental Health**

**Part 1- Public**

**Matters for Information**

**1 HOUSING DELIVERY TEST 2021 MEASUREMENT – UPDATE**

**This report updates Members on the Government’s Housing Delivery Test (HDT) measurement for 2021.**

**It also sets out what the implications are for planning in terms of plan-making and decision-taking.**

**1.1 HDT 2021 Measurement**

1.1.1 On 14 January 2022, the Government published the HDT 2021 measurement for local planning authorities across England. This is a measure of housing delivery over the previous three years (up to 31 March 2021) against the housing requirement generated by the Government’s standard method. It should be noted that the requirements for the last two years were adjusted down slightly to reflect the impact of COVID-19 pandemic on the construction industry.

1.1.2 The 2021 HDT measurement for Tonbridge & Malling borough is 63%.

1.1.3 This means that housing delivery over the three-year monitoring period fell short of the Government’s requirement by 37%.

1.1.4 To provide some context, set out below in Table 1 are the 2021 measurements for the Kent districts and Medway.

**Table 1: HDT 2021 Measurements – Kent and Medway**

<b>Area Name</b>	<b>Housing Delivery Test: 2021 measurement</b>
Maidstone	170%
Ashford	118%
Dartford	105%
Tunbridge Wells	97%
Dover	88%

<b>Area Name</b>	<b>Housing Delivery Test: 2021 measurement</b>
Folkestone and Hythe	85%
Swale	78%
Medway	67%
Canterbury	65%
Tonbridge and Malling	63%
Sevenoaks	62%
Gravesham	57%

1.1.5 The measurement for Tonbridge & Malling was the third lowest in Kent and Medway.

1.1.6 In terms of the wider context:

- Over two-thirds of Local Planning Authorities (LPAs) across England achieved a HDT measurement of 100% or better.
- Of those failing the HDT, just over 50 LPAs achieved a measurement below 75% - the threshold below which the Government's presumption in favour of sustainable development applies to decision-taking.
- Only 8% of LPAs achieved a HDT measurement lower than TMBC's.

## **1.2 Implications of HDT 2021 Measurement**

1.2.1 A measurement of 63% implies the following:

- An updated HDT Action Plan needs to be prepared. Members will recall that an Action Plan was reported to the meeting of this Board on 29 June 2021. The action points will need to be reviewed and updated. The Government expects the updated Action Plan to be published within six months of the publication of the HDT 2021 measurement, i.e. by 14 July 2022.
- A buffer of 20% needs to be applied to our five-year housing requirement. Ordinarily a 5% buffer is required, to ensure choice and competition in the market for land. However, a HDT measurement below 85% is deemed by the Government to represent a significant under delivery of housing and the 20% needs to be applied to improve the prospect of achieving the planned supply.
- The presumption in favour of sustainable development applies when taking decisions on development proposals. This means defaulting to the

Government's National Planning Policy Framework (NPPF) on policies relating to the supply of new homes and balancing the adverse impacts of the development proposal against the benefits.

- 1.2.2 It should be noted that in terms of decision-taking, the presumption in favour of sustainable development already applies in Tonbridge & Malling because of the absence of a five-year supply of deliverable housing sites.
- 1.2.3 In terms of the implications of a 20% buffer, this means that our Housing Land Supply (HLS) Position as at 31 March 2021 is 3.02 years. A summary table highlighting the key components of this calculation is set out in **Annex 1** to this report. For context, the application of a 5% buffer would result in a HLS position of 3.45 years, which is notably better.
- 1.2.4 Significant contributors to the projected supply of deliverable housing sites include the build-out of the remainder of the Peters Village development, land east of Hermitage Lane (Whitepost Field) and four sites allowed at appeal (three sites at Kings Hill and land west of Winterfield Lane).
- 1.2.5 To provide some context for our HLS position, below are the findings of recent research undertaken by Savills:
- as of November 2021, the average housing land supply amongst English local authorities was 6.1 years. Our HLS is less than half this average (3.02 years).
  - 16% of local authorities in England have fewer than 4.5 years of land supply and have also failed to adopt an NPPF-compliant plan. This includes Tonbridge & Malling.
- 1.2.6 All of this evidence points to the need for positive action in the short, medium and long term to get back on track and enjoy more control and influence over where and how growth in the borough takes place.
- 1.2.7 In the short to medium term it is important to get an adopted Local Plan in place as soon as possible. Having an up-to-date Plan will allow for more local control over how the borough grows because it will provide clarity and certainty over where development should and should not go. The Government is pushing for full coverage of Plans across England which highlights its belief in the plan-led system.
- 1.2.8 Prior to the adoption of the Local Plan, it is important that proposals that come forward for sustainable development are supported wherever possible to help address the under-delivery of housing. This means granting permission for development that is deemed to meet the presumption in favour of sustainable development as set out in the Government's National Planning Policy Framework, para.11d). We operate in a plan-led system and in the absence of an up-to-date

Local Plan, sustainable development that meets this presumption is a key delivery tool.

### **1.3 Legal Implications**

1.3.1 There are no legal implications arising from the publication of the HDT 2021 measurement.

### **1.4 Financial and Value for Money Considerations**

1.4.1 There are no direct financial and value for money considerations associated with the publication of the HDT 2021 measurement.

### **1.5 Risk Assessment**

1.5.1 There is a risk that if positive action is not taken in response to the consequences of a HDT measurement of 63%, the Council is likely to encounter a similar measurement for 2022.

Background papers:

HDT 2021 Measurement

HDT 2021 Measurement - Technical Note

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