

London Borough of Newham Housing Delivery Test Action Plan

June 2024



1. Introduction

1.1 The Housing Delivery Test Action Plan sets out the measures the Council is taking to help facilitate delivery of quality homes in the Borough. It has been prepared in response to Newham's 2022 Housing Delivery Test result.

What is the Housing Delivery Test?

- 1.2 The Housing Delivery Test (HDT) was launched by the Ministry of Housing, Communities & Local Government (MHCLG) in July 2018 as part of published revisions to the National Planning Policy Framework (NPPF). It is an annual measure of housing delivery for Local Planning Authorities (LPAs), being one of a number of reforms introduced by the Government designed to boost house building across the country.
- 1.3 The HDT measurement is a percentage calculated from the net homes delivered against the number of homes required for a plan-making authority over a rolling three year period.
- 1.4 Results of the Housing Delivery Test are published annually by the MHCLG, with the results of the 2022 measurement published in December 2023. The detailed results of the 2022 measurement for Newham is provided below.

| Number of homes required Total Number of | | | of homes o | delivered | Total | Measurement | Consequence | | |
|--|---------|---------|------------|-----------|---------|-------------|-------------|-----|--------|
| 2019-20 | 2020-21 | 2021-22 | | 2019-20 | 2020-21 | 2021-22 | | | |
| 2519 | 1832 | 2752 | 7103 | 2297 | 1296 | 2341 | 5934 | 84% | Buffer |

London Borough of Newham 2022 HDT Measurement¹

1.5 While the London Legacy Development Corporation (LLDC) is a separate plan-making authority, the majority of the area within the LLDC boundary comprises LBN land. As such, the HDT result for the LLDC is also provided below. It should be noted that the LLDC's planning powers will be transferring back to Newham on 1st December 2024.²

London Legacy Development Corporation 2022 HDT Measurement

| Number | Number of homes required Total Number of homes delivered | | | Total | Measurement | Consequence | | | |
|---------|--|---------|-------|---------|-------------|-------------|-------|-----|------|
| 2019-20 | 2020-21 | 2021-22 | | 2019-20 | 2020-21 | 2021-22 | | | |
| 1,346 | 1,434 | 2,154 | 4,934 | 1,818 | 1,408 | 1,589 | 4,815 | 98% | None |

1.6 MHCLG have disaggregated the LLDC area from LBN in its published HDT measurements, with each planning authority individually assessed for the purposes of measurement.

¹ MHCLG: <u>Housing Delivery Test: 2022 measurement - GOV.UK (www.gov.uk)</u>

² LLDC: <u>Transfer of Planning Powers | Queen Elizabeth Olympic Park</u>



Consequences of failing the Housing Delivery Test

1.7 In introducing the HDT measurement, the NPPF outlines associated required 'actions' that Local Authorities must take if housing numbers are not delivered in accordance with the identified housing requirement for their area. These measures are intended to boost provision in future years, and are of varying consequence dependent on the scale of under-delivery. The consequences of HDT results apply until the publication of any subsequent result. For clarity, a summary of the HDT consequences is outlined below.

| If housing delivery falls | | If housing delivery falls | | If housing delivery falls |
|---|---|--|---|---|
| below 95% | | below 85% | | below 75% |
| The publication of an action plan | + | • a 20% buffer on an LPA's 5-year land supply | + | the NPPF's presumption in favour of sustainable development applies |

1.8 Following the publication of the HDT results for 2022, LBN received a result of 84%. This means the Borough is required to apply a 20% buffer on its future Five Year Land Supply, and produce an action plan to demonstrate how the Borough plans to incentivise increased housing delivery across future years.

Causes of Under-delivery

1.9 Newham will publish a Site Allocation and Housing Trajectory Methodology note later this summer, which provides analysis of why Newham has been unable to achieve its housing target. For further information on the causes of under-delivery, please refer to the methodology note published as part of the Draft Submission Local Plan evidence base (due for publication in July 2024).



2. Action Plan

Action Point 1: Reviewing Newham's Local Plan

- Continue work on the refresh of the Newham Local Plan, including going out for consultation on the Submission Draft Local Plan in summer 2024. The plan includes 45 site allocations and a new housing target that seeks to deliver over 50,000 homes across the new plan period. It also plans for a wide range of infrastructure to support new housing growth, which will be monitored through updates to Newham's Infrastructure Delivery Plan (IDP).
- 2.1 Newham adopted its current Local Plan in December 2018. The 2018 Local Plan housing target seeks the delivery of 43,000 homes between 2018 and 2033, and contains 31 strategic site allocations.
- 2.2 LBN as a pro-development authority is committed to boosting housing supply to address local needs. This means not only delivering more homes, but ensuring new housing is well-designed, resilient to climate change, improves air quality and creates healthy environments. Since 2021 we have consulted on an Issues and Options document and a draft Regulation 18 version of the Local Plan. Our new housing target has been shaped through design-led capacity testing of site allocations, and provides a more realistic stepped trajectory against which to monitor housing delivery. The Infrastructure Delivery Plan will continue to work in tandem with the Local Plan, identifying and monitoring infrastructure needs and the delivery of key pieces of infrastructure to support housing growth.

Action Point 2: Continuing to implement the proactive steps taken at administration level to boost housing delivery

- Utilise secured grant funding to continue delivery of the Affordable Homes for Newham programme, in accordance with Mayoral pledges.
- Continue to support the authority's wider estate regeneration programme at Canning Town, Custom House and Carpenters to deliver co-produced, mixed tenure projects.
- Working with the GLA to help address the delivery constraints facing the Capital, namely the delivery of genuinely affordable homes.

Newham London

- 2.3 Newham's Housing Delivery Strategy (2021) sets out the borough's approach to meeting our residents' housing needs, including for genuinely affordable homes. In recent years Newham has secured grant funding through the Mayor of London's Building Council Homes for Londoners programme. The grant is being used through the Affordable Homes for Newham Programme, which prioritises the delivery of genuinely affordable homes by Newham's Regeneration team and Populo Living.
- 2.4 In 2023, Newham also adopted the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF). The Royal Docks and Beckton OAPF provides planning, regeneration and design guidance for the Royal Docks area, Beckton Riverside and much of Canning Town and Custom House, guiding and facilitating development in the area up to 2041. The OAPF will also be a mechanism to help support the delivery of key infrastructure in the area, which in turn will facilitate the delivery of design-led site allocations within the OAPF area boundary.
- 2.5 Looking to the longer term, the Local Authority's Regeneration Programme is also set to deliver high numbers of new dwellings across the Authority's new plan period. To date, planning permission has already been granted for:
 - the first phases of the Custom House regeneration, including outline permission for the wider Freemasons Road site allocation; and
 - the Vincent Street site, which forms part of the wider Canning Town East site allocation.
- 2.6 A resolution to grant has also been agreed for the Carpenters Estate outline planning permission.

Action Point 3: Maintain a constructive dialogue with relevant stakeholders to engender a co-ordinated approach to delivery

- Continuing the practice of listening to and engaging with developers, land owners, land promoters, residents and Duty to Co-operate partners through the wider plan-making and monitoring process.
- Working with Developers to inform the Five Year Land Supply, identifying where sites are stalled and understanding any barriers to delivery which can be addressed by the Local Planning Authority.
- Providing an efficient and high quality Development Management procedure that offers certainty to applicants at the earliest stage of the planning process, facilitated through comprehensive Pre-Application feedback and Project Planning Performance Agreements (PPPAs).
- Promoting the use of PPPAs for large-scale, complex schemes, helping to streamline decision making for strategically significant development proposals.



- Utilising the Development Members Control Forum and the independent Design Review Panel to identify any questions or concerns surrounding major development schemes, helping to smooth their transition through the decision making process.
- Ensuring all planning applications are determined in a timely and efficient manner, working with Applicants to resolve issues which arise through assessment and decision making where these can be overcome within the scope of the application submitted.
- 2.7 As outlined in Action Point 1, Newham are in the process of reviewing our adopted Local Plan. As part of the plan-review process to date, we have undertaken extensive engagement with both residents and developers on the policies and site allocations contained within the draft plan. This has helped to ensure the deliverability and soundness of proposed policies, targets and site allocations within the draft Submission Local Plan.
- 2.8 Separate to plan-making, a responsive Development Management team will also help to ensure that we continue to deliver high quality customer service. Constructive dialogue with developers throughout the application cycle is critical to the timely processing of applications. This includes ensuring any issues arising from schemes are addressed at an early stage of the application process. Continued utilisation of pre-application discussions and planning project performance agreements (PPPAs) will provide applicants with increased certainty around whether proposals accord with the provisions of the development plan and help to guarantee the smooth transition of applications through the planning process. Similarly, the Council's Development Control Members Forum and Design Review Panel help to facilitate the determination of complex major scale development works through the application and development committee process.

Monitoring Action Points

2.9 Monitoring of the measures employed by the Council to stimulate housing delivery will continue to be assessed through the Local Authority Monitoring Report Housing Bulletin. This document will look at the issue of delivery figures in the wider plan context, analysing reasons for delivery figures across the financial years that are monitored.