



London Borough of Islington Housing Delivery Test Action Plan 2019



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1 Introduction

- 1.1 This is the second Housing Delivery Test Action Plan for London Borough of Islington and covers the three-year period from April 2016 to March 2019. Islington has a proven track record of exceeding housing targets – and looking forward has a significant housing pipeline of consents. The Borough is committed to facilitating the delivery of high quality housing to meet the needs of residents.
- 1.2 The PPG states that a HDT action plan should 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. There is no prescribed form that the action plan should take.
- 1.3 The decision on whether to consult on an action plan, and which stakeholders to involve, is for the local planning authority. Islington do not intend to consult on this HDT action plan. Of the key stakeholders who can be involved in creation of an action plan, the council has regular contact with neighbouring boroughs and infrastructure providers, and has engaged extensively with landowners and developers as part of the ongoing review of the Local Plan. Representations received during the Local Plan review process have been assessed and the issues raised are relevant to the production of this action plan, especially in terms of the aspects which local planning authorities could review as part of the action plan as identified in the PPG, have been considered.
- 1.4 In formulating this action plan, Islington have had regard to PPG and information produced by the Planning advisory service.
- 1.5 This Action Plan reviews the commitments made in the 2018 Action Plan and outlines further measures the Council is taking to facilitate the delivery of quality and affordable homes for residents.

What is the Housing Delivery Test?

- 1.6 The Housing Delivery Test (HDT) was introduced through a revision to the National Planning Policy Framework (NPPF) published in July 2018, and was unaffected by the further revision to the NPPF published in February 2019¹ and the subsequent revision in June 2019 (which removed paragraph 209a). The HDT is an annual measurement of housing delivery in a local planning authority area, defined in Annex II to the NPPF as follows: “*Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.*”
- 1.7 The Housing Delivery Test Measurement rulebook² sets out the method for calculating the HDT result. [National Planning Practice Guidance \(PPG\)](#) provides further information on how the HDT is to be applied.
- 1.8 With regard to the housing target used to assess delivery, the Housing Delivery Test Measurement rulebook specifies that, in areas where a Spatial Development Strategy (SDS) is also in place:
 - the district target will continue to be used until it is more than five years old, or the requirement has been reviewed and found not to require updating; or
 - the apportioned housing requirement in a SDS will be used where the district target is more than five years old and the SDS is less than five years old (or where relevant strategic policies have been reviewed and found not to require updating).

- 1.9 The second bullet point applies to Islington, as the housing target set out in the Local Plan is more than five years old, but the target set out in the London Plan was adopted within the last five years. Therefore, Islington's target for the purposes of the 2019 HDT is based on the 2016 London Plan made up of 1,264 units per annum for each of the reporting years. However it should be noted that The London Plan 2021, contains a lower housing target for Islington (775 units per annum).
- 1.10 Results of the HDT are published annually by the Ministry of Housing, Communities and Local Government (MHCLG), with the results of the 2019 measurement published in February 2020. The results of the 2019 measurement for Islington are provided below.

Consequences of failing the Housing Delivery Test

- 1.11 Islington's 2019 HDT results show that Islington delivered 64% of its housing target. By way of context, 62 LPA's had a level of delivery below 95% and of these 50 also fell below 85%.
- 1.12 The NPPF specifies the actions that Local Planning Authorities (LPAs) must take if housing numbers are not delivered in accordance with the identified housing requirement for their area.

If housing delivery falls below 95%	If housing delivery falls below 85%	If housing delivery falls below 45%
<ul style="list-style-type: none"> The publication of an action plan 	<ul style="list-style-type: none"> a 20% buffer on an LPA's 5-year land supply 	<ul style="list-style-type: none"> the NPPF's presumption in favour of sustainable development applies.

If an authority's housing delivery falls below 25% (based on November 2018 HDT figures); 45% (based on November 2019 HDT figures) or 75% (from November 2020 HDT figures onward), the presumption in favour of sustainable development (NPPF paragraph 11d) would be applied (even where there was shown to be a five-year housing land supply) – see footnote 7 and paragraph 215 of the NPPF.

2 Housing Delivery Analysis

Islington's Housing Delivery Test Result

- 2.1 The HDT results published in February 2020 shows the following delivery:

Table 1 – HDT 2019 housing delivery figures and LBI housing delivery (amended), 2016/17 to 2018/19

	2016/17	2017/18	2018/19	Total
Housing target (as per 2019 HDT)	1,264	1,264	1,264	3,792
	1,035	370	983	2,388

	2016/17	2017/18	2018/19	Total
Housing delivery as per 2019 HDT				
Percentage	82%	29%	78%	63%
LBI housing delivery figures (amended)	1,035	414	960	2,432
Percentage	82%	33%	76%	64%

- 2.2 Islington maintains a housing trajectory which details past housing delivery and projects future housing delivery. The figures used as the basis for the trajectory come from detailed annual surveys of extant planning permission and are supplemented by additional sources of data from other council departments, such as building control and council tax records. As shown in Table 1 under the LBI housing delivery figures, Islington's trajectory has different figures than the 2019 HDT. This is largely due to how student accommodation development was counted.
- 2.3 The 2018 HDT method for calculating student accommodation was based on a 2.5 bedspace: 1 unit basis. As noted in last year's action plan this leads to differences in the reporting of figures for past completions, with student accommodation schemes in London historically permitted and counted on a 1 bedspace: 1 unit basis. This was an important material consideration in the decision to award planning permission. The PPG has now been revised so that studio flats within student accommodation schemes are calculated on a 1:1 basis. In light of this change, the 2017/18 figures for this year's HDT should have been revised upwards by an additional 44 units. In order to take account of the 74 studios that were completed as part of the development at 263-289 Holloway Road (Planning reference: P2013/2963/FUL). Table 1 provides this revised total alongside the HDT 2019 figures.
- 2.4 Overall, for the 2019 HDT figures published in 2020 whilst housing delivery increased in 2018/19 this is still below the London Plan housing target of 1,264 and the three year average is 64% meaning the requirement for an action plan stands and a 20% buffer continues to be necessary.

Table 2: London Plan Annual Monitoring Report

	2016/17	2017/18	2018/19
LBI housing delivery	1,580	367	979
Housing target (from London Plan Further Alterations 2015)	1,264	1,264	1,264
Percentage	125%	29%	

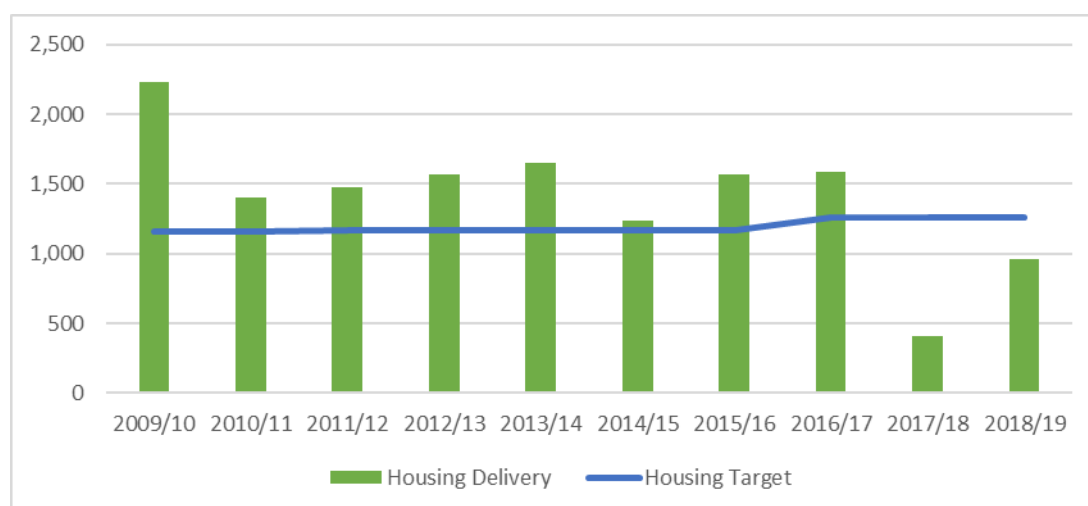
*These figures do not include vacancies brought back to use (homes which have been vacant for a certain period of time before being utilised for housing) The Council has not projected any supply from vacancies returning to use in the future, as they will no longer be a component of housing supply in the new London Plan.

- 2.5 The latest London Plan AMR (no.15) covers the period 2017/18, while the London Plan AMR no.14 covers the period 2016/17. London Plan AMR no.16 shows the figure for 2018/19 is 979. The figures taken from the London Plan AMR align closely with Islington's trajectory figures noted in Table 1.
- 2.6 The GLA submit figures to MHCLG on behalf of London boroughs. These figures form the basis for a number of national statistical publications. However, it is important to note that the delivery figures held by the Council, the GLA and MHCLG historically employed different methodologies, which count certain types of housing in different ways. Further, it should be noted that the MHCLG figures are taken at a certain point in time, hence they only provide a 'snapshot'. Figures produced by the Council and the GLA are often updated on an 'ad hoc' basis when new information comes to light.
- 2.7 A measurement timeframe of three-years' disregards long-term performance and provides the opportunity for anomalous housing data to compromise the wider aims of a development plan.
- 2.8 Following a sustained period of exceeding housing targets there is now a more limited land capacity in the borough for new housing developments to come forward. The new London Plan (and emerging Local Plan) sets a target for delivery of 7,750 homes between 2019/20 and 2028/29, or 775 homes per annum. This is a significant reduction from the previous housing target of 1,264 units per annum, set out in the adopted London Plan; this is mainly due to a reduction in the availability of large housing sites, as assessed in the Strategic Housing Land Availability Assessment (SHLAA). The transition to a new housing target which more accurately reflects the boroughs capacity will assist with meeting the HDT.
- 2.9 Table 3 and Figure 1 below show that Islington has over-delivered on its housing targets by 2,036 units (117%) over the decade from April 2009 to March 2019. Table 5 also looks at the rolling three-year delivery figures against rolling three year targets, from 2009/10 to 2018/19. This shows that the only instances where Islington falls below 100% delivery are years 2017/18 and 2018/19. Delivery for the other seven instances was never less than 119%.

Table 3: Islington Housing Delivery 2009/10 – 2018/19

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Housing delivery	2,232	1,403	1,481	1,564	1,654	1,234	1,568	1,585	411	960	14,092
Housing target	1,160	1,160	1,170	1,170	1,170	1,170	1,264	1,264	1,264	1,264	12,056
Percentage	192%	121%	127%	134%	141%	105%	124%	125%	33%	76%	118%
Rolling three year delivery		6,344	5,116	4,448	4,699	4,452	4,456	4,387	3,564	2,956	
Rolling three year housing target		3,480	3,490	3,500	3,510	3,510	3,604	3,698	3,792	3,792	
Percentage delivery		182%	147%	127%	134%	127%	124%	119%	94%	78%	

Figure 1: Islington Housing Delivery 2009/10 – 2018/19



Reasons for under-delivery

2.10 The individual circumstances of landowners and developers is one of the key issues which impacts the speed at which sites get built out, and one which is entirely out of the Council's control. Issues that create barriers to homes being built include:

- the business model of the landowner – whether or not they intend to build themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission;
- access to finance and cost of interest payments;
- land value expectations; and
- the extent of the freeholder/leaseholder motivation to develop the site.

2.11 One of the factors that led to overall under-delivery against housing targets has been delays to large sites with planning permission. Four sites in particular were expected to have recorded some completions in 2018/19 but did not and are detailed in Table 4 below.

Table 4: Delays to major sites with planning permission

Planning Reference	Site address	Number of units	Comments
P041261	Kings Cross Triangle Site, York Way	115	Scheme permitted in 2008. Delays due to slow progress building out wider Kings Cross permission.
P052245	Block A,B,D,F (Site 1), Islington Square, Former North London Mail Centre	185	Scheme permitted in 2007. A number of additional ad hoc change of use applications submitted on site, which has delayed completion.
P090774	Site 2 (Block C), Royal Mail Sorting Office, Almeida Street and Upper Street	76	Scheme permitted in 2012. As above, site has been delayed due to developer ad hoc applications for change of use.

Planning Reference	Site address	Number of units	Comments
P092492	City North Islington Trading Estate, Fonthill Road	355	Scheme permitted in 2010. Delays due to transport issues and change of ownership of site.
TOTAL		731	

- 2.12 Projected completion dates are informed by a range of sources, but ultimately to be counted in a five-year housing supply, a site must conform with the definition deliverable in the NPPF. The four sites in the table above would have all been considered deliverable at the point when they were added to the housing trajectory with some delivery in 2017/18. Had this delivery taken place as projected within 2017/18, Islington would not have been placed in the 'buffer' category based on the HDT results. The completion of planning permissions can be delayed for a range of reasons, but the delays on the sites outlined above are considered to be unusually long when compared to other sites in Islington. This experience highlights an important point; delays to planning permissions being built out are largely outside the council's control.
- 2.13 In addition to the above, as broader context the borough has an increasingly constrained supply of land to deliver housing following a long and sustained period of delivering significant amount of housing. The results of the SHLAA (2017) demonstrated that the borough has a shortage of land for development leading to a reduction in the borough's housing target in the draft London Plan. The new London Plan will revise the boroughs housing targets down from 1264 units per annum to 775, a 38.7% reduction. The borough is therefore also in a transitional period in terms of housing supply and delivery. The revised housing target in the new London Plan is considered to more accurately reflect the current situation in the borough in terms of the capacity to deliver against housing targets.

3 Action Plan

- 3.1 Responses to support housing delivery need to be proportionate, recognising that the council has, for a considerable time, facilitated the delivery of new housing through a variety of means.
- 3.2 The role of an action plan 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. While this document does consider a broad range of potential actions which the Council has already been undertaking (and continues to undertake), continuing to pursue this range of actions has the potential to be effective in delivering new housing going forward (and has contributed to the Council consistently meeting housing targets in previous years, as demonstrated in Table 3).
- 3.3 The steps the authority has taken to facilitate delivery across the borough were detailed as a series of Action Points in the London Borough of Islington's Action Plan published in September 2019.
- 3.4 As part of this Action Plan, the Action points from 2018 have been reviewed and updated where relevant.

Action Point 1: Taking a proactive approach to the development management process

2018 action points

- The Council will continue to actively encourage engagement as early in the planning process as possible through pre-application advice and utilise PPAs to ensure issues are identified more quickly and permission is granted without long delays.

- 3.5 Constructive dialogue with developers throughout the application cycle will continue to be central to the timely processing of applications, to ensure any problems that do arise are addressed at an early stage of the application process. As highlighted in LBI's 2018 Action Plan, the Council continues to encourage pre-application discussions and planning performance agreements (PPAs) to facilitate a smoother development management process. Furthermore, the Design Review Panel continues to play an important role through the provision of specific architectural advice on complex schemes.
- 3.6 There are 157 site allocations in the draft Local Plan, it is estimated that 65 sites (41%) have planning permission, with an additional 9 sites subject to live planning applications. Of the remaining sites, 28 have been or are currently subject to pre-application discussions in the last three years. This demonstrates a high proportion of key development sites (approximately (68%) are or have been active in the development management process. Historically the 2013 Local Plan identified 101 site allocations across the Site Allocations DPD and Finsbury Local Plan. Of this total 44 have been delivered with more currently under construction demonstrating the high level of delivery in the borough.
- 3.7 In response to the Covid-19 pandemic the council's Development Management service have and continue to ensure that planning applications are processed through virtual planning committees, pre-application meetings and planning appeal hearings/inquiries.
- 3.8 The council's Development Management Service monitors resourcing within the teams and works with developers to secure funding to enable in many cases dedicated (or shared) additional staff resources to be brought in to focus on the delivery of new homes. For example, very large sites and developments have dedicated officers (planning and urban design plus heritage officers where needed) to ensure responsive, genuinely pro-active and helpful shaping of pre-application proposals.
- 3.9 Additionally, the service has officers dedicated to facilitating the Council's own New Build Housing programme both within the Major Applications Team and the Design & Conservation Teams, with the aim of ensuring planning is resourced to facilitate an increase in the speed of delivery.

Further Actions Proposed

- Engaging with developers around their anticipated delivery timeframes.
- Ensuring applications are not unduly stalled throughout the Covid 19 crisis, including continuing to host development committees on online platforms.

Action Point 2: Council Housebuilding

2018 action points

- The Council has committed to utilising its own land, particularly small parcels of land on existing housing estates, to turbocharge Council housebuilding and deliver 550 new council homes by 2022.
- The council's New Build Housing team has been expanded and will work closely with other teams, including Planning to facilitate the acceleration of the council's house building programme.

3.10 The delivery of high quality and affordable homes is a key priority for the Council. This is reflected in the council's own ambitious housebuilding programme.

3.11 Council led schemes are closely monitored for their development progress. Such schemes are less exposed to market fluctuations and so can have greater predictability in their delivery. These developments will also play a key role addressing the stark affordability issues, whilst also providing an appropriate mix of housing sizes based on local need – helping to combat acute overcrowding issues that are also experienced in the borough.

3.12 When combining extant permissions with sites currently being built out the Council has an in-house pipeline of 628 units that will not only contribute significantly to the borough's overall housing numbers but help address aforementioned deficiencies in relation to affordability and overcrowding. Looking forward, there are over 250 units – across eight schemes – that are at the pre-planning stage and the new-build team and the planning department are working closely in collaboration to advance these sites.



Council housebuilding scheme – Dover Court – Completed in August 2019.

- 3.13 Islington's dense urban nature combined with intense competition for land and the different identified development needs to be balanced mean that there is a limited supply of sites to deliver new homes. The Council is working hard, across teams, to accelerate Council housebuilding as demonstrated by the clear pipeline of consents set to be developed and to come forward.
- 3.14 The Council's new build team has over 10 years of experience delivering good quality, genuinely affordable homes, having already successfully completed 33 new schemes, the highest of any London Borough, delivering 406 new homes, 83% of which are homes for social rent. In the early years delivery was generally smaller scale but proposals are expanding and the new build team are dealing with larger and more complex sites. The council has the ambition is to ramp up delivery over the next 15 years and to facilitate this the council has undertaken a thorough review of housing land to identify additional opportunities in the medium to longer term which will help to increase housing delivery from council schemes.

Further Actions Proposed

- 3.15 The Council has made the below commitments regarding the delivery of affordable homes and these will be closely monitored:
- Deliver a further 550 new council homes by 2022;
 - Ensure at least 50% of new homes on all eligible sites in the borough are genuinely affordable homes; and
 - Identify further sites that can deliver new housing in the medium to longer term.

Action Point 3: Joint Working

2018 action points

- Maintain a close and consistent working relationship with adjoining boroughs and with the Greater London Authority (GLA)

- 3.16 The Localism Act states that a Local Planning Authority must cooperate with other Local Planning Authorities to maximise effectiveness of plan-making. For Islington these are (primarily) the neighbouring Local Planning Authorities (the City of London and the London Boroughs of Hackney, Camden and Haringey) and the Mayor of London.
- 3.17 Islington maintains a close and consistent working relationship with neighbouring boroughs and the GLA, including through meeting 'duty to co-operate' requirements as part of Local Plan preparation and monitoring. These relationships facilitate understanding around wider development trends and relevant local and regional issues with regard to housing delivery.
- 3.18 The council has continued to work proactively with other authorities to identify and bring forward sites for housing. For example, continuing discussions on delivery of the vacant Clerkenwell Fire Station site as well as the delivery of other public sector owned land. Following the production of the Holloway Prison SPD the council have continued to work with the landowner (Peabody) and the GLA to bring forward a planning application on the site.

Action Point 4: Local Plan

2018 action points

- Additional housing capacity identified as part of the Local Plan review through site allocations, including a significant proportion of smaller sites which enables greater diversity and opportunities for developers (including SME builders) to bring forward housing sites in the borough,
- Reduce the reliance on site-specific viability by prescribing a fixed affordable housing target for identified housing sites; this will ensure certainty and could speed up delivery by ensuring that schemes are not subject to delays as a result of protracted viability assessment/negotiations.

3.19 The results of the SHLAA 2017 demonstrated that the borough has a shortage of land for development leading to a reduction in the borough's housing target in the draft London Plan. However, the draft Local Plan has identified that opportunities do exist that will help the borough meet its housing target now and in the future.

3.20 The emerging Local Plan has been submitted to the Planning Inspectorate and is currently at Examination. As part of the examination process the council have undertaken further work to identify additional housing capacity. This has resulted in the identification of 9 additional housing sites as well as amendments to a number of existing allocations to enable the delivery of additional housing.

Further Actions Proposed

- Progression of the draft Local Plan towards adoption, this will provide further certainty around housing supply going forward.

Action Point 5: PPG potential actions for improving housing delivery

2018 action points

- Assess suitability of PPG potential actions for improving housing delivery in Islington

3.21 The PPG identified several actions which a Local Authority could consider to boost housing delivery. Whilst each of these recommendations were addressed in the 2018 HDT table, the council has continued to review them.

Table 5: PPG potential actions

PPG action	LBI response
Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land.	In London, the SHLAA is led by the Mayor. The most recent SHLAA was completed in 2017 and, for Islington, remains an accurate assessment of housing land availability in the borough. Outside the Local Plan making process Islington Council New Build team is working on a number of projects with CCG supported by funding through the One Public Estate programme to bring forward proposals to intensify use of public sector land with healthcare facilities and housing.
Working with developers on the phasing of sites, including whether sites can be subdivided.	Islington does not have many large sites where phasing is possible. For the large sites where it is possible, e.g. City Forum, Holloway Prison, there is currently no indication that development will stall to the degree that site-specific actions are necessary to expedite site delivery.
Offering more pre-application discussions to ensure issues are addressed early.	See above – paragraph 3.5.
Considering the use of Planning Performance Agreements.	See above – paragraph 3.5.
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites.	Recent ‘call for sites exercise’ was conducted between 2016 and 2018. Further housing sites have also been identified as part of the Local Plan examination process.
Revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies.	The Local Plan addresses a broad range of development needs, including a need for significant amounts of new business floorspace. This is a key factor in the consideration of further opportunities for housing, with a clear need to balance needs to ensure sustainable development. As part of the Local Plan examination process modifications are proposed to

PPG action	LBI response
	several site allocations to help enable the delivery of housing.
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use.	Article 4 Directions are kept under review, but it is important to note the need to achieve sustainable development, which includes planning for employment and other needs. In that sense, Article 4 Directions provide important protections for employment floorspace, and while they may restrict potential housing delivery in certain locations in particular the CAZ, outside the CAZ Article 4 Directions are very specifically targeted to key sites and areas and are important to help balance housing delivery alongside the need to plan for the provision of jobs.
Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed.	The Council undertakes annual surveys of planning completions, and also regularly source site specific information throughout the year, including specific engagement with developers and interested parties on particular schemes.
Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed.	There is no evidence to suggest that planning conditions have been, or will be, a barrier to housing delivery in the Borough. The Council will keep the use of conditions under review and will aim to simplify their use as far as reasonably possible, without compromising policy requirements.
Ensuring evidence on a particular site is informed by an understanding of viability.	Islington has a specialist viability team who regularly review site information, work pro-actively to keep up to date on the latest market conditions and also regularly seek advice from specialist external viability consultants. The emerging Local Plan policies have undergone rigorous viability testing to ensure that policies are deliverable and will not be a barrier to development coming forward. The Council also undertook site-specific viability work to inform the Holloway Prison Site SPD.
Considering compulsory purchase powers to unlock suitable housing sites.	The Council is focused on making best use of its own land to develop new Council housing. While CPO is not expressly ruled out, it is not a tool which is under active consideration at this time.
Using Brownfield Registers to grant permission in principle to previously developed land.	The Council is seeking to maintain the brownfield land register (BLR) with as up to date information as possible. As part of this update, the Council will consider which (if any) sites might benefit from PiP.

PPG action	LBI response
Encouraging the development of small and medium-sized sites.	The expected housing capacity from all allocated sites in the emerging Local Plan includes a significant proportion from small sites of less than one hectare, in line with the NPPF, which enable greater diversity and opportunities for a wider range of developers, for example SME builders, to develop in Islington.

4 Monitoring Action Points

- 4.1 The Council remains committed to meeting and exceeding the housing target identified in the emerging Local Plan. The actions described above are a holistic set of measures which will enable the achievement of this commitment.
- 4.2 To ensure delivery is on track, the Council will monitor the progress of development in order to swiftly identify where slippage may occur. This may then enable specific interventions where appropriate. The Council may seek views from relevant stakeholders in future, to ensure robust, meaningful monitoring.
- 4.3 The Council is required to review the Local Plan every five years to determine whether there are any elements that require updating. Where there is robust, verifiable evidence of specific policies and/or allocations constraining the delivery of new homes, such policies/allocations may be revised in a Local Plan update, which in turn may lead to increased delivery of new homes.
- 4.4 The Council will also have regard to any review of the London Plan, in particular any revised housing targets provided as part of any such review.
- 4.5 Should the Council be identified as requiring an Action Plan as a result of future HDT measurements, reviews of the Council's Action Plan document will be undertaken to ascertain whether additional steps can be taken to help facilitate delivery in future years.