

Cheltenham Borough Council

Cabinet – 10 June 2025

Housing Delivery Test Action Plan 2025

Accountable member:

Councillor Mike Collins – Cabinet Member for Planning and Building Control

Accountable officer:

Daniel O'Neill, Senior Planning Policy Officer

Ward(s) affected:

All

Key Decision: No

Executive summary:

Cheltenham is an enabling council and recognises the role it plays in meeting the growth needs for our area. The Council is positive and proactive in its response working collaboratively and innovatively with its partners Tewkesbury Borough and Gloucester City Council to plan strategically for its housing needs. The provisions for this set out in the [Gloucester, Cheltenham and Tewkesbury Joint Core Strategy](#) (JCS).

Since 2019 the Government has published Housing Delivery Test results – this is an annual measurement of housing delivery over a rolling 3-year period. The Government has set a high bar and to pass the test local planning authorities must meet 95% and above of its housing requirement. Where a local planning authority falls under the 95% bar the Government has put consequences in place.

We undertake regular assessment of our housing land supply. Cheltenham's supply is a challenging one as around 50% of our housing supply is planned for delivery by the JCS strategic allocations at Northwest and West Cheltenham. This means we

have a heavy reliance on the delivery of the JCS strategic allocations to meet our needs. The impact of this means that for the last Housing Delivery Test results, Cheltenham, like many other councils across England are in a position of not meeting the 95% test. For the latest period Cheltenham is 65%.

This report sets out the positive steps Cheltenham is making to assess the causes of under delivery and to identify actions to boost housing delivery via an action plan.

Recommendations: That Cabinet:

- 1. approves the prepared Housing Delivery Test Action Plan, June 2025 for publication;**
- 2. delegates authority to the Director of Community and Economic Development, in consultation with the Cabinet Member for Planning and Building Control, to prepare the Housing Delivery Test Action Plan (HDTAP) for publication correcting any minor errors;**
- 3. delegates any future updates to the HDTAP to the Director of Community and Economic Development, in consultation with the Cabinet Member for Planning and Building Control.**

1. Implications

1.1 Financial, Property and Asset implications

No financial, property and asset implication arising from this report.

Signed off by: Ela Jankowska – Finance Business Partner **Date:** 16.05.2025

1.2 Legal implications

Paragraph 79 of the National Planning Policy Framework (December 2024) requires local planning authorities to monitor progress in building out sites that have planning permission, and where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance to assess the causes of under delivery and identify actions to increase delivery in future years. The Council is therefore required to produce an action plan. The Housing Delivery Test Action Plan meets the requirements of Paragraph 79c of the National Planning Policy Framework (December 2024).

Signed off by: Charlotte Lockwood, Locum Senior Lawyer, One Legal
Charlotte.Lockwood@onelegal.org.uk

1.3 Environmental and climate change implications

The delivery of new housing will require applications for planning permissions to be submitted to the Council for determination. The requirements in the Local Validation List for planning applications include metrics from the Cheltenham Climate Change SPD, which provides guidance on how applicants can successfully integrate a best-practice approach towards climate and biodiversity in their development proposals. Hence the planning process in regard to housing delivery ensures environmental and climate change impacts are considered, aiming to encourage building to net zero carbon standards. For this reason, a Climate Impact Assessment is not required.

Signed off by: Maizy McCann, Climate Officer, Maizy.McCann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities: Increasing the number of affordable homes through our £180m housing investment plan

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity

1.5 Equality, Diversity and Inclusion Implications

There are no expected impacts on the lives of people, including employees and customers. The Housing Delivery Test Action Plan focus is only on the intervention options open to the Council to improve the supply of housing. For a full Equality Impact Assessment (Screening) see Appendix 2.

1.6 Performance management – monitoring and review

The Housing Delivery Test measurement is published annually by government. The Housing Delivery Test Action Plan will be reviewed annually, until housing completions reach 95% of the housing requirement.

2 Background

2.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery against the Local Planning Authorities (LPAs) housing requirement based on the preceding three financial years. It is calculated using the Governments' [rule book](#) and the results are published each year. The detail of this is set out in Appendix 3 (see section 2).

2.2 The most recent HDT results was published [in December 2024](#), and it gave the Council a result of 65% delivery against its defined level of housing requirement covering the period from 1 April 2020 to 31 March 2023. Since the percentage

achieved is less than 95% there is a requirement for the Council to prepare a Housing Delivery Test Action Plan (HDTAP). Cheltenham is not alone and ensuring an adequate supply of land for housebuilding remains a key issue for many local planning authorities in England. Around 35% of local planning authorities failed to meet the HDT.

2.3 Housing delivery for Cheltenham to meet this test is a significant challenge as the strategic allocations as allocated by the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) is approximately 50% provided for by these sites. These sites are now coming forward for determination, but until the schemes have a successful planning consent, these do not contribute to meeting Cheltenham's 5-year housing land supply. There have been many challenges affecting the trajectory of the delivery of the strategic allocations some of which are not uncommon with large strategic sites, but some are site specific to Cheltenham and over which the Local Planning Authority relies on others to seek resolution:

- M5 Junction 10 – working planning applications alongside Development Consent Order (DCO) process; a process that has been significantly impacted by the delays triggered by the Covid 19 pandemic and having knock on impacts across the strategic allocations and other major sites
- Complex site issues e.g. High-pressure gas main (Northwest Cheltenham) and finding appropriate resolutions to the satisfaction of the relevant statutory agencies
- Resolving technical issues e.g. access, highways, infrastructure, environmental and landscape
- Finding solutions to the Cotswolds Beechwoods – Suitable Alternative Natural Green Space (SANG)
- Resolving statutory consultee and wider stakeholder issues/objections
- Viability challenges
- Consultation and re-consultation activities.

2.4 The Council are committed to the delivery of new housing in the borough and the HDTAP will focus on the intervention options open to the Council. Whilst it is noted that a number of actions identified are principally in the remit of the Council to undertake, it recognises that support and co-operation are needed from those involved in delivering new homes. Cheltenham has a positive and proactive relationship with developers, agents and stakeholders and is confident that the HDTAP will be effective. This is demonstrated in the recent positive consent granted subject to S106 Agreement by both Cheltenham and Tewkesbury Local Planning Authorities on 29th May 2025 for 4,115 new Homes at Elms Park, Northwest Cheltenham and the scheduling of key sites in the West Cheltenham strategic allocation being programmed for determination by planning committee summer/autumn 2025.

3 Reasons for recommendations

3.1 In 2018, Central Government introduced the HDT as a mechanism to measure delivery against a LPA's housing requirement and the requirement for an action plan if fell below this requirement. It is the first occurrence where the housing delivery in the borough has fallen below 95% of its housing requirement over the previous three year and therefore this is the first HDTAP that the Council has needed to produce.

3.2 The Planning Practice Guidance (PPG) Housing supply and delivery stipulates that HDTAP's 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 improve levels of delivery"* (Paragraph 039 Reference ID: 68-047-20190722). It also includes what an LPA can review, consider and publish within an action plan.

3.3 This HDTAP has been prepared in accordance with the advice set out in the PPG and the structure of the action plan is set out below;

- The Councils HDT result;
- Issues relating to housing delivery;
- Key actions and responses;
- Monitoring and future review.

3.4

4 Alternative options considered

4.1 Because the HDTAP is a requirement triggered by paragraph 79c of the NPPF, there is no suitable alternative to its production.

5 Consultation and feedback

5.1 There is no statutory requirement for consultation.

6 Key risks

6.1 As set out in Appendix 1, the risk can be avoided through publishing this Housing Delivery Test Action Plan

Report author:

Daniel O'Neill, Senior Planning Policy Officer

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment (Screening)
- iii. Housing Delivery Test Action Plan 2025

Background information:

[Cheltenham Corporate Plan \(2023 – 2027\)](#)

[National Planning Policy Framework \(December 2024\)](#)

[Housing Delivery Test: 2023 measurement](#)

[Housing Delivery Test: 2023 measurement technical note](#)

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the Council does not prepare and publish a HDTAP then it will not be fulfilling the requirements set out by paragraph 79 of NPPF	Director of Communities & Economic Development	3	1	3	Avoid the risk	Close	The risk will be mitigated by the Cabinet decision	10 June 2025

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment

Officer responsible: John Spurling	Service Area: Planning
Title: Planning Policy Manager (Interim)	Date of assessment:
Signature: John Spurling	

b. Is this a policy, function, strategy, service change or project?

Strategy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Housing Delivery Test Action Plan

Is this new or existing?

New or proposed

Please specify reason for change or development of policy, function, strategy, service change or project

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims: To outline issues relating to the delivery of new homes within Cheltenham's borough and actions intended to improve housing delivery

Objectives: To improve the Council's housing delivery rate and Housing Delivery Test measurement

Outcomes:	To avoid having to prepare a future Action Plan
Benefits:	As above

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

No

Do you expect the impacts to be positive or negative?

No impact expected

Please provide an explanation for your answer:

The Housing Delivery Test Action Plan focus is only on intervention options open to the Council to improve the supply of housing, a statutory function for the Council

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate

Stage Two required	No
Owner of Stage Two assessment	N/A
Completion date for Stage Two	N/A

assessment

Please move on to Stage 2 if required ([intranet link](#))