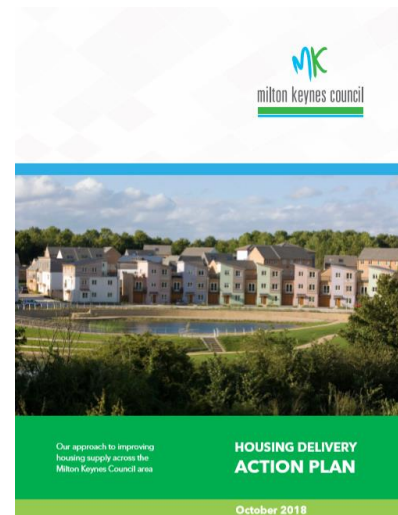
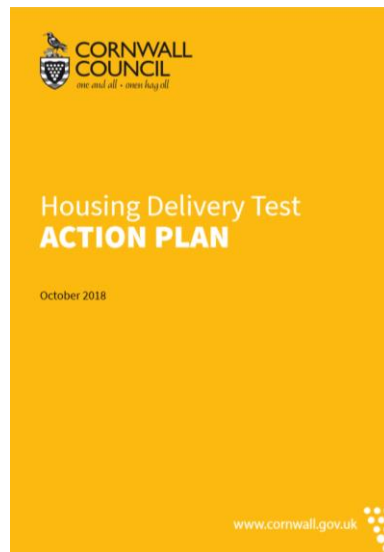
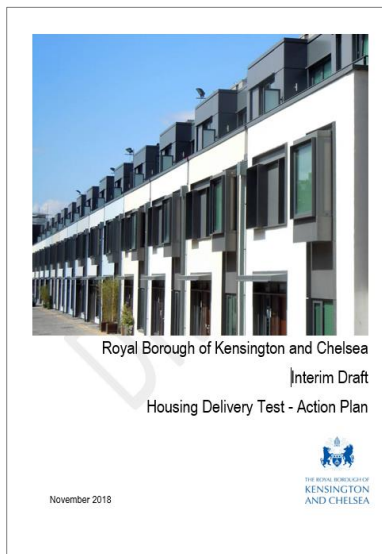


Housing Delivery Test

Preparing Effective Action Plans

June 2020



Document Information

This guide will be edited and added to in response to experience of using it and as necessary in response to any future changes in the regulatory framework. A summary of the changes included in each version will be recorded here.

Version Schedule

Version	Date	Summary of changes
First Publication	15.01.2019	
Second Publication	01.07.2020	<ul style="list-style-type: none">• General updates including references to Planning Practice Guidance and Policy• Insertion of Chapter 2 – top tips for preparing an action plan

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Executive Summary

In 2018 the "Housing Delivery Test" (HDT) was introduced into the planning system as part of the [National Planning Policy Framework](#) (NPPF). HDT is an annual measurement of housing delivery in the area of relevant plan-making authorities against the number of homes that are required.

Where the HDT indicates that housing delivery in an area is below a specified level, the NPPF sets out a series of actions that authorities must undertake. For authorities that have a HDT result below 95% this includes the requirement to prepare an action plan that considers the root causes of under delivery and identifies the actions that the authority will undertake to help increase housing delivery in future years.

The scope and nature of an action plan is not fully prescribed by national policy or guidance, and it is important that any approach relates to local circumstances and needs. This advice note has been developed to help practitioners understand and respond to the HDT requirements.

This advice note was first published in 2019 and has been updated to take account of the lessons learnt from the first cohort of action plans that were published pursuant to the 2018 HDT results. This includes in Section 2, a series of recommended top tips for preparing an effective plan.

Most importantly, we have learnt that action plans should be considered positively and proactively. It is clear that they can be a productive and helpful mechanism to understanding deliverability

issues within a local area. Indeed, they can also be an effective tool for authorities where HDT results are above 95%, including pre-empting and addressing potential future years delivery issues. This is likely to be even more important given COVID-19 and the potential impacts that it will have on delivery.

For an action plan to have purpose it is critical that they have relevant stakeholder engagement as well as corporate endorsement within your authority. To be effective senior leadership teams must commit to their actions and regularly monitor the results.

When preparing an action plan, we know that it requires the consideration of two fundamental components of delivery including:

- **Looking backwards:** Having a good understanding of the issues affecting delivery within a particular area over the last 3 years, to align with the HDT assessment period; and
- **Looking forwards:** Identifying potential issues around future delivery and forecasting how delivery will change over time. This should be linked to evidence on 5-year housing land supply.

To do this we have learnt that the preparation of an effective action plan should follow a five staged process with stakeholder engagement running throughout. This includes:

- Stage 1 - Data gathering
- Stage 2 - Root Cause Analysis
- Stage 3 - Action planning
- Stage 4 - Consulting and publishing
- Stage 5 - Implementing and monitoring

Each of these stages is considered in more detail in Section 4 and are supported by relevant case study experience.

The Planning Advisory Service (PAS) has also [published other complimentary](#)

[resources](#) that should be considered alongside this advice note when considering delivery issues and requirements.

1. Introduction

1.1 Overview of the Housing Delivery Test

The Housing Delivery Test (HDT) measures net additional dwellings provided in a local authority area against the homes required.

The methodology for calculating the HDT measurement is set out in the Housing Delivery Test Measurement Rule Book¹, and the Ministry of Housing, Communities and Local Government (MHCLG) will publish the HDT result for each local planning authority in England annually in November, or as soon as possible thereafter.

The requirements of the HDT are set out in the National Planning Policy Framework (NPPF)². They include:

- Where the HDT is below 95% the requirement to publish an action plan;
- Where the HDT is below 85% a 20% buffer must be applied to the authority's 5-year land supply; and
- From 2020 where HDT is below 75% the presumption in favour of sustainable development must be applied. (Please note for the transitional years 2018 and 2019 this threshold was 25% and 45% respectively)

The actions that must be taken are dependent upon the HDT result, but they must be applied concurrently where the

result is below multiple thresholds. For example, an authority that has a 44% HDT result in 2019 must publish an action plan, apply a 20% buffer to their 5-year land supply and apply the presumption in favour of sustainable development.

The consequences of the HDT result will continue to apply until subsequent years HDT results are published, or a new housing requirement is adopted. The relevant action(s) for any under-delivery will then be applied. Should delivery exceed 95%, no consequences will apply. Where a new housing requirement is adopted, an authority can apply to MHCLG to have their HDT recalculated using the new targets, pro-rata from adoption.

1.2 Overview of the action plan

All local planning authorities with a result of less than 95% have six months to prepare an action plan from the date that the HDT results are published. The role of an action plan as set out in Planning Practice Guidance³ 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.”

A local planning authority can prepare an action plan at any time, irrespective of the HDT result. Indeed, an action plan can be part of a proactive approach to thinking ahead, understanding, and managing

¹

<https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

²

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test>

potential risks to future housing supply. It can be an effective tool in helping to demonstrate a 5-year housing land supply.

and local planning authorities are advised to prepare materials in a form most appropriate to their local circumstances.

An action plan is intended to be a practical document, focussed on effective measures aimed at improving housing delivery within an area. However, issues affecting delivery are likely to vary significantly across the country and within individual areas, so for an action plan to be relevant and effective for a particular locality, it should be underpinned by appropriate evidence, research and local understanding.

To ensure an action plan has optimal impact, local planning authorities should publish it within six months of the publication of the HDT result (i.e. by May of the following year where the HDT is published in November). Clearly, the earlier that appropriate actions and measures are identified and implemented then the sooner the impact on housing delivery can be seen.

This document forms part of a wider resource pack to support the preparation of an action plan. Accompanying resources include:



A template action plan document (report style). This could form the basis of a written action plan.



A root-cause analysis data worksheet. This could be used to capture and compile relevant data on local housing sites, their delivery, key issues and local responses.

These resources are not intended to be prescriptive in terms of style or format,

2. Top tips for developing an action plan

The HDT, and the requirement to produce action plans, has only been in place since 2018 with the first action plans produced in 2019. It has been a steep learning curve for all involved and there are some key learning points from the action plans produced so far.

The most important lesson is that action plans can be a productive and helpful mechanism to understanding deliverability challenges within a local area. They should be developed positively and not considered merely an administrative burden.

Action plans should be supported by relevant and current evidence, including engagement with key stakeholders. They present a real opportunity to help monitor, evaluate and consider the delivery of local plans and / or strategic requirements.

Regardless of what the HDT result may be for an area, effective action plans can be used by any authority as collaborative tools. They can help to achieve wider 'buy-in' to delivery from stakeholders as well as demonstrate the benefits of what a plan-led approach to development in an area can achieve.

Drawing on experience to date, set out below are more top tips that we recommend you consider and take account of when developing your action plan.

2.1 Make it concise, easy to read and for the right audience

Try and make your action plan straightforward and drafted in a style that would allow non planning professionals to understand what you are trying to do and why, or how, it might affect them. When drafting the action plan ask yourself "would the Chief Executive of your authority, or a local resident, understand the information and the actions proposed?".

Think also about who you want to read it and who is likely to read it. Will it be the developer community? Your Leader of the Council? Why do they care or why might they read it? Remember no one wants to read your "things to do list", make the plan informative and set out what you expect to achieve from the actions proposed.

Make sure that you are drafting the action plan for all those who will use it. For example, this could include a planning inspector where it is used as evidence supporting an update to your local plan and / or the decision making of individual planning applications.

2.2 Respond positively and use it to reinforce your strategy for delivery

The HDT is here to stay and should be embraced as a positive tool to help you understand and address delivery challenges in your area.

You should make sure that your action plan includes evidenced projections of delivery, including a range of development scenarios and reflecting the status of your local plan. Test what your future HDT results will be by using the [PAS spreadsheet prediction tool](#).

Remember, in future years HDT results could decline because of the way that the standard methodology for local housing need is phased into the calculation. Results may also change where a plan is adopted part way through an evaluation period, setting a new housing requirement.

It is imperative that your action plan seeks to reinforce your strategy for development across your area. Ensure that the actions you identify are clearly connected to securing the delivery set out in your local plan. In the event that evidence produced as part of your action plan indicates a departure from your local plan use this to help inform any revisions to your strategy and updates to the local plan.

An action plan has the ability to form a core component of your annual monitoring data as well as a proactive and transparent tool to help support planned delivery.

2.3 Identify immediate actions as well as short/medium/long term

The six-month timescale for drafting an action plan, coupled with the scheduled publication of the next HDT results the following November, does not leave a lot of time for actions to take effect. It is therefore important to think about any quick or immediate actions that will have a demonstrable impact. This may include actions that are already in motion or things that can be implemented immediately, for example, changes to development management processes.

It is important that actions link back to the root cause of delivery challenges. Think about whether they will help solve the

actual issues that impact delivery in your area.

You will need to set out in your plan how you will demonstrate progress on your actions in the future. Identified actions in the plan should be able to be monitored with outcomes recorded in future years action plans. They should demonstrate and evaluate progress and the effectiveness of the chosen action.

It is important to remember that unless you understand and address the deliverability challenges in your area the HDT results will not improve and you may be faced with further government sanctions as set out in the NPPF.

2.4 Look beyond planning

Think “inside” / “outside” the council. Delivery of housing is affected by the wider housing market and multiple factors both in and outside of the planning system. The action plan should refer to all factors that affect delivery and identify actions, where reasonable and possible, that require engagement with other agencies / stakeholders outside of the planning system.

2.5 Identify key decisions required to deliver the actions

Make sure that your plan identifies what decisions and / or permissions are required to deliver the specified actions. As identified above, it is highly likely that stakeholders beyond the planning department will be fundamental to addressing some of the delivery challenges. It is therefore important to set out how decisions will be taken and how relevant actions will be assigned to

different parties both within and outside of your council.

You should seek corporate support and leadership of the actions proposed, ensuring that your senior leadership teams and Councillors are fully engaged and supportive of the proposals. Where some of the necessary decisions can only be granted following publication of the action plan make sure that there is a caveat to explain this.

2.6 Draft it as a promotional tool

The action plan can be useful promotional material for your area and can be used to market and raise awareness of the actions that the council is taking to encourage sustainable development, including any relevant local housing initiatives. Think positive promotion for your area and a culture of being open for business.

Weaponise your action plan if you need to. If housing delivery and land supply is a constant challenge for your area, and the matter is raised frequently at planning appeals, the action plan can be the perfect place to set out the wider picture.

The plan should include a narrative on what is happening with delivery, the timeline for local plan production, evidence on supply and how they relate to each other. You can create an easy to read document which brings everything together and can be utilised as evidence in multiple scenarios, for example, with planning inspectors and other external parties.

3. Leadership and wider context

3.1 Corporate Leadership

The best action plans are corporate documents; they provide a real opportunity to think about the delivery of your local plan or strategy and achieve wider 'buy-in' from others on the benefits of what plan-led development can achieve.

The action plan should set out what other parts of the council are doing to enable delivery whether that is housebuilding, land disposal or setting up a housing company.

Thanet Case Study - Leadership

The Thanet District Council action plan sets out that housing delivery is a corporate priority and looks to understand the nature of the local housing market and the barriers to delivery. Thanet has the weakest new homes market in Kent and its historic weak economy has been a barrier to large scale development. Actions are focussed on marketing programmes for the area, building on current initiatives to help boost the attractiveness of the housing market and building on the positive thrust and substantial greenfield opportunities provided by the new Local Plan.

This included an action on the creation of a new railway station (Parkway Station expected to open in 2022) which will reduce journey time to London to just over an hour and will improve market conditions and boost local delivery. Most of the major new strategic allocations will be easily accessible to the new Thanet Parkway Station. The Council itself has committed £2M of its budget towards its construction. Full funding for the Parkway Station has recently been confirmed.

3.2 Stakeholder Engagement

Engagement is the common thread running through the process of preparing an action plan. It is for the local planning authority to decide which stakeholders to involve in the consideration of appropriate actions and development of the document.

Representatives of those with an impact on the rate of delivery in the area should be included, such as, but not limited to those set out in the Planning Practice Guidance⁴:

- Small and large developers;
- land promoters;
- private and public landowners;
- infrastructure providers (such as utility providers, highways, etc) and other public bodies (such as Homes England);
- upper tier authorities (county councils) in two-tier areas;

⁴ <https://www.gov.uk/guidance/housing-supply-and-delivery>

- neighbouring authorities with adjoining or cross-boundary sites; and
- any other bodies with an interest in particular sites identified.

Active engagement with stakeholders will help to identify key relevant local issues and challenges and help to derive effective solutions. Some issues will require infrastructure providers and others from beyond the boundary of the local planning authority. Engagement should however remain proportionate to the task in hand and enable issues and actions to be derived in a timely and efficient manner.

4. Stages in the development of your action plan

4.1 Data Gathering

Whilst the factors affecting delivery will vary across the country and between authorities, there are commonly used data sets and good practice methods that can be used to assemble and coordinate data.

Existing information is preferred because it can be used quickly to:

- understand what sites are already delivering;
- check whether this in line with expected rates;
- identify sites due to come forward in the next five years; and
- clarify issues already affecting particular sites or landowners.

The data available will come from a number of sources and could be held in different council departments. Sources of existing data are likely to include:

- 5-year housing land supply data;
- Annual Monitoring Report evidence;
- Strategic Housing Land Assessment (SHLAA), call for sites and other local plan evidence;
- Data / information relating to Section 106 planning obligations (there may be relevant triggers for obligations that are dependent upon the number of completed homes etc.) or community infrastructure levy (CIL) contributions to demonstrate commencement and / or completions; and
- Information from developer / housebuilder forums.

Housing action plan pilot authorities found other, sometimes less obvious, sources of data such as Council tax registrations; Building Regulation Certificates issued and refuse collection registrations.

Recommendation

All the relevant data should be collated into a single database to assist in the diagnostic process. This resource pack includes a template worksheet which could be used to capture local data into one place in a standard format. However, many authorities already have bespoke databases which can be adapted to suit the HDT purpose, and no council should need to start from scratch.

The goal is not to require 100% accuracy or completion. In examining the data, a useful starting point is to assess whether the information provides a reasonable basis to understand the local position. The information should provide a reasonable overview based upon local typologies/sizes/complexity of the local housing market and supply context. Gaps in understanding are usually a sign of a lack of stakeholder engagement.

For larger authorities, there may be too much data to deal with efficiently.

Local Planning authorities may need to categorise or split the data into certain development typologies. These should be determined locally and could be based

upon development type, location, size or another locally derived approach. A typology-based approach would enable key trends and issues to be identified across large numbers of separate sites.

Cornwall Case Study - Proportionate & targeted data monitoring

The Council area is large and diverse, and compiling relevant information is a challenge. The Council is proactive in engaging with site promoters and developers to 'get under the skin' of individual site issues and is able to do this in a proportionate way by focusing on the larger sites and by using a RAG rating approach.

The Council has drawn the data together into a comprehensive spreadsheet that provides specific information on current site delivery, and this has helped identify actions and approaches by the Council on individual sites and across the wider area. The Council keep the information 'live' and up-to-date on an ongoing basis.

Where information is not available about specific sites, data from previous years is assessed and where necessary, average lead in times and delivery rates are applied to typologies of sites (based on size ranges).

4.2 Root Cause Analysis

Once data has been gathered, there will then need to be an assessment of what it

is saying about local delivery. We call this the 'Root Cause Analysis' and it uses the information in order to extract potential trends, issues, implications or factors influencing local delivery, either generally or across certain typologies of sites.

When assessing issues that may be influencing delivery analysis of the following considerations set out in the Planning Practice Guidance⁵ may be useful:

- barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales;
- barriers to delivery on sites identified as part of the 5 year land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.);
- whether sufficient planning permissions are being granted and whether they are determined within statutory time limits;
- whether the mix of sites identified is proving effective in delivering at the anticipated rate;
- whether proactive pre-planning application discussions are taking place to speed up determination periods;
- the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery; and
- whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within

⁵ <https://www.gov.uk/guidance/housing-supply-and-delivery>

the authority, but also with neighbouring and upper tier authorities where applicable.

Another point to think about is whether current or future supply is highly dependent upon a smaller number of strategic sites, and whether these require bespoke approaches to keep them on track.

The outcome from the ‘root cause analysis’ process should be a reasonable understanding of the main local issues and challenges influencing delivery rates, which can be used as the basis to evolve and test potential actions and interventions. We learned from the pilot authorities that there is a risk that the findings become a long list of generic “we should improve the way we do X” exhortations. A thorough challenge is required to ensure that the output correctly identifies underlying causes and does not just flag a series of symptoms.

Harrogate Case Study - The local issues influencing delivery

To gain a better understanding of what barriers might be acting to deter or delay housing delivery in the local area, Harrogate Borough Council compiled relevant information and sought an external impartial view (via the LGA’s Housing Expert programme) to assess dynamics within the local housing market, and how this was influencing, along with other factors, the delivery of new housing.

This commission involved face-to-face interviews with representatives of sites capable of delivering the majority of the permissioned houses in the district, together with key service areas within the Council and external consultees (including the Highway Authority and York, North Yorkshire and East Riding Local Enterprise Partnership).

Using an external body to carry out this analysis enabled frank and open discussions – which might not have been forthcoming had the review been managed internally. The analysis led to the Council identifying a range of suitable actions to be included within the Action Plan.

4.3 Action planning

The issues that will begin to emerge from the above data gathering and root cause analysis, will need to be turned into tangible actions to be included in the final plan. Some of these could be contentious, may require a corporate response (beyond the planning function), and/or may rely on other stakeholders. The process of creating an action plan is an iterative process to test what actions have been identified and whether they will be effective and appropriate.

The previous two stages of the action planning approach should have raised an awareness of the nature of local issues, challenges, implications and possible scope of a necessary response. This should effectively involve risk identification and establish the basis for subsequent risk management.

This creates the opportunity to raise the profile of housing delivery and ensure that

it is recognised as not just a problem for 'planning'. It is likely to have wider implications for a Council in terms of corporate growth ambitions, meeting the identified needs of the local population, and future income (i.e. Community Infrastructure Levy receipts, New Homes Bonus), etc.

In deciding who to involve in this process and where to report the initial action plan, it is helpful to think about the following points:

- Does the Council have a corporate approach to delivery/growth issues currently? If so, where is this reported to?
- How active/willing is the Council to adopt a proactive approach, such as direct funding, delivery or use of its own land/assets, or bidding for government funding? If so, where are these decisions made?
- Might a solution need to involve a different approach to the allocation of land to meet need?
- Is there an issue of resources – either around monitoring or potential, identified actions?
- Do the identified issues have implications for other Departments; authorities or organisations?
- Where should decisions be made and progress reported? Is there a suitable Committee, Group or Board in place to perform this function or is something new needed?

At the core of the action planning process, local planning authorities will need to identify actions to boost delivery. Some useful ideas and options relating to the

use of planning tools and actions are set out in the Planning Practice Guidance⁶ and include:

- 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;
- Working with developers on the phasing of sites, including whether sites can be subdivided;
- Offering more pre-application discussions to ensure issues are addressed early;
- Considering the use of Planning Performance Agreements;
- Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites;
- 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;
- Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- 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;
- Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed;

⁶ <https://www.gov.uk/guidance/housing-supply-and-delivery>

- Ensuring evidence on a particular site is informed by an understanding of viability;
- Considering compulsory purchase powers to unlock suitable housing sites;
- Using Brownfield Registers to grant permission in principle to previously developed land; and
- Encouraging the development of small and medium-sized sites.

Additionally, there are other planning tools not explicitly set out above (such as [Local Development Orders](#)), and process improvements (such as streamlining Section 106 planning obligations processes). There may also be a wider range of actions and interventions that will give a comprehensive response, such as:

- **Place marketing & promotion**, to actively promote the area/specific areas to stimulate market interest. This could be targeted at different audiences, for example where there are limited active developers, a focus could be placed on housebuilders/investors, or where there is a need to stimulate market demand, place-based marketing could stimulate consumer demand.
- **Land assembly**. A proactive approach may be needed to address local difficulties in the land market, including possible use of compulsory purchase powers, and best use of public sector owned land.
- **Infrastructure planning, bidding, funding & finance**. Where infrastructure delivery is holding up supply, proactive approaches may be needed to identify funding opportunities, bid for monies, and/or evolve new local infrastructure funding mechanisms.
- **Delivery vehicles**. Entirely new delivery vehicles might be required, for example housing development

companies, joint ventures or statutory vehicles such as development corporations.

- **Employment & supply chain**. Where issues exist with the local capacity of the construction industry, initiatives may be needed to work with education, training and local businesses to enhance and build local capacity across the construction industry.

Actions identified through this process should be clear, implementable and measurable. The action plan could include a range of interventions classified as immediate, short, medium and long-term to help provide some immediate improvements to delivery, but also to help with long-term planning for general growth aspirations.

Milton Keynes Case Study - Evolving a range of actions

The Milton Keynes Housing Delivery Action Plan sets out a broad range of practical and proactive measures that the Council is putting in place to address low rates of delivery, and a process to monitor implementation.

Five key strands of activity have been identified by the Council based upon local issues and challenges that are influencing delivery, with a range of actions set out for each. The key strands include:

1. Corporate prioritisation of housing delivery as a key cross-cutting theme to drive behaviour and decision making within various parts of the Council;

2. Improved planning processes and consistency in decision making, making the planning process more efficient and effective;
3. Supporting the market to deliver, including ensuring a more diverse supply of land is brought to market and addressing issues relating to a reliance on a small number of large sites;
4. Stimulating demand through effective placemaking, marketing & promotion;
5. Working with Central Government and other stakeholders, such as to secure new infrastructure funding.

4.4 Consulting and Publishing

Consulting

There is no requirement to consult on an action plan, and extensive consultation will not be possible within the six month production timetable. However, if the actions identified have corporate and/or financial implications then some formal process of consultation may be required.

For example, improving procedures around section 106 planning obligations mechanisms may require legal and stakeholder involvement; funding and delivery interventions may require the involvement of developers and/or Homes England. Ideally, those affected by and involved in actions should be consulted and engaged as part of the reporting process.

Publishing

The action plan needs to be a publicly accessible document and published within 6 months of the HDT results announcement. It should provide a clear

statement of the conclusions of the work and allow stakeholders to work together.

Not all of the actions identified at the internal reporting stage will necessarily need to be provided in detail as part of a published action plan. Indeed, some of the information regarding specific site-by-site detail, stakeholder situations/approaches, financial or commercial considerations may not be suitable for publication. In these circumstances, the action plan could summarise key messages, conclusions and actions that emerge from the internal analysis and reporting procedures.

As part of this resource pack [a template for an action plan report is provided](#) that could be adapted to suit local circumstances. Accompanying data standards will be tested in the hope that the underlying data can also become open and accessible.

4.5 Implementing and Monitoring

The action plan will not be a one-off piece of work and should be maintained as a live document. For the actions to be effective, they could require changes to internal procedures, planning policy, etc. Some elements could take time to implement and take effect. It is therefore important to establish how it will be implemented at the initial reporting stage—who is responsible for what and by when – and how it will be monitored over time.

Councils already carry out extensive monitoring and the action plan process should be incorporated alongside it, rather than being something separate and new. Where joint cross-boundary working is involved, and actions are (at least in part) reliant on outside organisations, the

involvement of others in monitoring and implementation be addressed.

monitoring impact and adjusting the action plan over time.

In some cases, the creation of a new Committee, Group or Board could provide an appropriate structure for reporting,



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