

# Sevenoaks District Council – Housing Delivery Test Action Plan

November 2022

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## Executive Summary

- This action plan explores reasons for under delivery of housing in the District identified through the Housing Delivery Test (HDT) result for 2021. The result for Sevenoaks District is 62% of the required amount of housing has been delivered in the District which means an action plan must be produced, include a 20% buffer in the 5 year housing land supply requirement and apply the presumption in favour of sustainable development.
- It finds areas of improvement and aspects which are already working towards increasing delivery through root cause analysis of different aspects of the planning process.
- Actions in the Councils control are set out with an aim to improve delivery. Headline actions include; adoption of a new Local Plan, increased training and discussion around HDT, development of additional guidance & research and upkeep/improvement of existing processes & procedures.

# Introduction

- 1.1 This action plan has been prepared to investigate the reasons for the delivery of sites for housing in Sevenoaks, measured by the Housing Delivery Test (HDT), and sets out measures to boost delivery in the District.
- 1.2 National policy reflects the Government's objective to significantly boost the supply and delivery of new homes. The National Planning Policy Framework (NPPF) sets out that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 1.3 Paragraph 76 of the NPPF states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites that have permission. 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.
- 1.4 National Planning Practice Guidance (PPG) states that action plans should identify reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures to improve levels of delivery.
- 1.5 The aims of this Action Plan are:
  1. To identify the current situation in terms of site delivery in the District;
  2. To ascertain the consequences of not delivering enough housing sites;
  3. To undertake root cause analysis, looking at the factors that have the potential to affect delivery; and
  4. To set key actions and responses to the findings as measures to improve delivery in the District.

# Current Position

- 1.6 Sevenoaks District covers almost 143 square miles and is highly constrained with 93% Green Belt and 60% within the Kent Downs or High Weald Areas of Outstanding Natural Beauty. These constraints have a significant impact on the amount of land that is suitable and available for housing development. Paragraph 11d(i) of the NPPF is likely to be relevant for consideration in many applications in the District, and therefore, the bar for gaining planning permission for housing development is often relatively high.
- 1.7 Sevenoaks District Council has planned for the delivery of 3,300 homes over the period 2006 up to 2026, 165 per annum, in its Core Strategy (2011) and Allocations and

Development Management Plan (ADMP) (2015). The allocated sites are focused in and around the main urban areas of the District and are mainly on brownfield land. The Council has performed well and exceeded this target consistently since adoption of the Core Strategy and despite the constrained nature of the District.

1.8 For the 2021 measurement there is a reduction in the period measuring total homes required. Usually this would be measured over a 3 year period, but an 8 month period has been used for the 2020/21 monitoring year. This is to account for the considerable variations in levels of housing delivery due to the disruption caused by the COVID-19 pandemic. Additionally, an 11 month period has been used for the 2019/20 monitoring year to account for disruption to housing delivery and monitoring caused by the first national lockdown in March 2020.

1.9 The number of homes delivered over the past 3 years are set out below against the annual Core Strategy target and annual Local Housing Need figure as set out in the Housing Delivery Test: 2021 measurement published 14 January 2022.

	2018/19	2019/20	2020/21
Annual Core Strategy Target	165	165	165
Number of Homes Required	708	647	473
Number of Homes Delivered	500	414	216

1.10 The HDT result is calculated by dividing the total net homes delivered over the previous three year period by the total number of homes required over the same three year period. For this set of results the number of homes required is determined using the “minimum annual local housing need figure” calculated using the standard methodology. This is because the adopted Local Plan (Core Strategy) is more than five years old.

Year	Number of homes required over previous 3 years	Number of homes delivered over past 3 years	HDT result
2019	1,712	1,212	71%
2020	1,858	1,302	70%
2021	1,828	1,130	62%

1.11 The HDT measurement result for Sevenoaks District Council is 62%, this means that 62% of the required amount of housing has been delivered in the District. Therefore, the Council is required to produce an action plan, apply the presumption in favour of

sustainable development and include a 20% buffer on the 5 year housing land supply in line with paragraph 74 of the NPPF.

1.12 The action plan set out below is considered proportionate to the level of delivery in the District.

## Significance of delivering housing in the District

1.13 Delivering sufficient housing in the District is important to meet the needs of its residents, this includes:

- Increased prospects of people being able to own their own home;
- Availability of suitable housing for an increasing ageing population;
- Avoiding the out-migration of younger and economically active groups through delivery of suitable housing;
- Increase in adaptable housing stock to meet the changing needs of those who will live there;
- Availability of housing for local key workers; and
- Increase in genuinely affordable homes.

# Root Cause Analysis

## Constrained nature of the District

2.1 Sevenoaks District is the tied top most constrained local authority in England with 94% of the District's land being constrained, alongside Tandridge and Epping Forest. This was acknowledged in data published as part of the "Planning for the right homes in the right places: consultation proposals" by MHCLG in 2017. Since then, planning reform has been rolled into the Levelling Up White Paper, published in February 2022. This notes that the levelling up agenda "will reduce pressure on housing and on greenfield and Green Belt sites in overheated areas of London and the South East". Until the Levelling Up and Regeneration Bill (LURB) and any related changes to the NPPF and planning practice guidance are made, there is much uncertainty as to how this will be achieved and what impact any changes will have on Local Plan preparation. However it is understood that transitional arrangements will be put in place between current and future regulations to minimise disruption to Local Plans that are already in progress.

## Neighbouring Authorities

2.2 The Council has signed statements of common ground with all of its neighbouring authorities which sets out to address cross-boundary issues regarding housing and infrastructure. Tunbridge Wells and Tonbridge share a Housing Market Area (HMA) with Sevenoaks known as the West Kent HMA. Of the 8 authorities that share a boundary with the district:

- Tonbridge & Malling, Gravesham and Tandridge are required to apply the presumption in favour of sustainable development;
- Wealden is required to apply a 20% buffer to their housing supply;
- Bexley is required to prepare an action plan; and
- Tunbridge Wells, Dartford and Bromley are not required to take any action.

2.3 Common issues regarding housing, identified in signed Statements of Common Ground, include:

- Constraints ie. Green Belt, AONB
- High house prices
- Migration from London
- Flood risk
- Traffic congestion
- Unable to meet full housing and affordable housing needs

2.4 The Council meets regularly with its neighbours under the duty to co-operate to discuss, and work towards solutions to, cross-boundary issues. In meetings going forward the Council will continue to discuss matters relating to housing delivery with neighbouring authorities.

# Adopted Local Plan

## Housing and Mixed-use Site Allocations

2.5 The ADMP allocates 16 residential sites and 7 mixed use sites, a total of 23 sites. Of these 23 sites 13 have received planning permission since its adoption in 2015. It is intended that, subject to reconfirming deliverability, the remaining 10 sites will be carried forward into the emerging Local Plan.

2.6 The sites below are allocations in the ADMP and have received planning permission:

Site Ref	Address	Status
H1a	Car Park, Hitchin Hatch Lane, Sevenoaks	Completed - hotel
H1d	School House, Oak Lane and Hoptarden Lane, Sevenoaks	Completed (southern part of site) - 4 dwellings
H1f	Greatness Mill, Mill Lane, Sevenoaks	Completed - 26 dwellings
H1i	Land West of Cherry Avenue, Swanley	Completed - 56 dwellings
H1j	57 Top Dartford Road, Hextable	Permissioned - 5 dwellings
H1k	Foxs Garage, London Road, Badgers Mount	Completed - 4 dwellings and 60 bed care home
H1l	Land adjacent to London Road, Westerham	Completed - 27 dwellings
H1n	Land at Croft Road, Westerham	Completed - 18 dwellings
H1o	Warren Court, Halstead	Under construction - 29 dwellings
H1p	Land West of Enterprise Way, Edenbridge	Under construction - 300 dwellings
H2b	United House, Goldsel Road, Swanley	Completed - 201 dwellings
H2c	Swanley Town Centre Regeneration Area	Permissioned - 303 dwellings
H2f	Powder Mills, Leigh	Completed - 49 dwellings

2.7 The sites below are allocated in the ADMP and have not yet received planning permission:

Site Ref	Address	ADMP Phasing
H1b	Cramptons Road Water Works, Sevenoaks	Years 0-5 (2012-2016) (Permission to demolish the old pumping station and offices has been implemented)

Site Ref	Address	ADMP Phasing
H1c	Sevenoaks Gasholders, Cramptons Road, Sevenoaks	Years 6-10 (2017-2021) (Full planning application for 136 units is currently under consideration)
H1d	School House, Oak Lane and Hopparden Lane, Sevenoaks	Years 6-10 (2017-2021) (northern part of site)
H1e	Johnsons, Oak Lane and Hopparden Lane, Sevenoaks	Years 6-10 (2017-2021)
H1g	Bevan Place, Swanley	Years 6-10 (2017-2021) (Full planning application for 93 units and retail floorspace is currently under consideration)
H1h	Bus Garage and Kingdom Hall, London Road, Swanley	Years 0-5 (2012-2016) (Permission to replace the place of worship has been granted. The officer's report states 'the proposed development is capable of being delivered without compromising the future development objectives of the wider site for residential development')
H1m	Currant Hill Allotments, Westerham	Years 10-15 (2022-2026)
H2a	Delivery and Post Office/BT Exchange, South Park, Sevenoaks	Years 10-15 (2022-2026)
H2d	Station Approach, Edenbridge	Years 0-5 (2012-2016)
H2e	New Ash Green Village Centre, New Ash Green	Years 10-15 (2022-2026)
EMP3	Fort Halstead	Hybrid application for up to 635 units, retail, employment and community floorspace is currently under consideration

2.8 Where a site was phased in years 0-5 (2012-2016) or 6-10 (2017-2021), the Council has reviewed the expected delivery with the site promoter to understand why the site has not come forward as planned, and where there is clear evidence that the site will be delivered, the information has been reviewed and the site included in the emerging Local Plan. All of the sites have been confirmed by the landowner or relevant agent as available for housing or mixed-use development. The same process has been followed for sites phased in years 10-15, although, as these sites were phased in later years they were expected to come forward later in the plan period anyway.



## The New Local Plan

- 2.9 Last year the Council was unsuccessful in judicial review and appeal proceedings against the decision of the appointed planning Inspector, who concluded that the plan was not legally compliant in respect of the Duty to Co-operate. When the examination halted, the Proposed Submission Version of the Plan (submitted April 2019) proposed almost 9,500 dwellings in the District until 2035. This is approximately 3 times the number of dwellings set out in the adopted Core Strategy (2011).
- 2.10 Since then, the Council has engaged with the Secretary of State to ensure a positive way forward, to adopt a Local Plan as soon as is reasonably practicable, which balances the need for housing and employment growth with the District's constraints such as Green Belt and AONBs. Quarterly meetings are held between the Council and the government's Department for Levelling Up Housing and Communities (DLUHC) to discuss the progress of the local plan, and a summary of each discussion is published in the Local Plan update report to the Development and Conservation Advisory Committee, the minutes of which are publically available on our website.
- 2.11 Until a new housing requirement is adopted the HDT calculation will continue to use the most up to date standard method housing need figure. The District is highly constrained and there are limited options for housing to come forward without the appropriate site allocations and policy. Therefore, it is predicted that the housing delivery test result will continue to draw NPPF consequences until a Local Plan can be adopted.
- 2.12 The Council is already engaged in work to produce a new local plan and a new Local Development Scheme has recently been adopted. The Local Plan evidence base is being updated which addresses key themes including: making the best and most efficient use of land, changes in work patterns and economic drivers and the future of town centres. The first Regulation 18 consultation is scheduled to take place in autumn 2022 and will focus on the potential for new development in non-Green Belt locations. The approach will reinforce the Council's development strategy of seeking to make best use of land in existing settlements and then examining all reasonable alternatives, before reaching a conclusion on whether exceptional circumstances exist to justify the release of Green Belt land. Regular updates on the local plan are set out at the Development and Conservation Advisory Committee, the minutes of which are publically available on our website.

## Five Year Housing Land Supply

- 2.13 Paragraphs 74-75 of the National Planning Policy Framework (NPPF) provide that planning authorities should identify a five-year supply of deliverable housing sites, including an appropriate buffer. The Housing Delivery Test result (2021) for Sevenoaks indicates that the District is currently delivering 62% of housing 'need', and therefore, as

set out in paragraph 74c of the NPPF, the Council must apply a 20% buffer. In addition, as the Core Strategy (2011) policies are more than 5 years old, the Standard Method figure for housing need must be used in place of the adopted housing requirement for calculating the five-year housing supply. Taking consideration of that set out above, the Council cannot currently demonstrate a five-year housing land supply. An updated 5 year housing land supply statement will be uploaded on the Council website shortly following publication of this action plan.

## Brownfield Register and Permission in Principle

2.14 The Brownfield Register is available on the Council's website and is also in the form of an interactive map to aid the public and potential developers in viewing brownfield sites across the District. Currently, the sites in part 1 of the Brownfield Register either benefit from planning permission or were proposed for allocation in the previously emerging Local Plan. The Brownfield Register will continue to be updated annually in line with government guidance and sites will be considered for Part 2 of the register (Permission in Principle or PiP) where appropriate. To date no applications for PiP have been determined and no sites have been moved to Part 2 of the Brownfield Register.

2.15 The Brownfield Register has a number of sites within urban confines that are not subject to Green Belt policy. The August 2021 HDT action plan proposed that design guidance was provided for these sites to encourage them to come forward. With this aim in mind, the Council is already undertaking a district wide characterisation study which will provide guidance towards what might constitute appropriate design for different areas of the District. This evidence will provide additional information for any future design guidance including sites in the brownfield register. Therefore, specific site guidance is to be reconsidered following the outcome of this study.

## Strategic Housing and Economic Land Availability Assessment (SHELAA)

2.16 As part of preparations for the new Local Plan, a call for sites was open between 14 October 2021 and 20 January 2022 and received approximately 370 submissions of land for housing, employment, and mixed use. Approximately 150 of these are considered to be in a sustainable location for development and are capable of delivering a minimum of five units. Priority has been given to assessing sites in non-Green Belt locations, to reflect the NPPF requirement to examine all reasonable options for meeting housing need before determining whether there are exceptional circumstances to release Green Belt land.

2.17 The assessment of non-Green Belt sites will be included in a new Strategic Housing and Economic Land Availability Assessment (SHELAA), to be made available alongside the

Regulation 18 version of the emerging Local Plan. It is anticipated that the SHELAA will be hosted as an interactive map similar to the Brownfield Register. This will make the information more accessible and allow individuals and organisations to view sites in the context of the District.

## Determination of planning applications

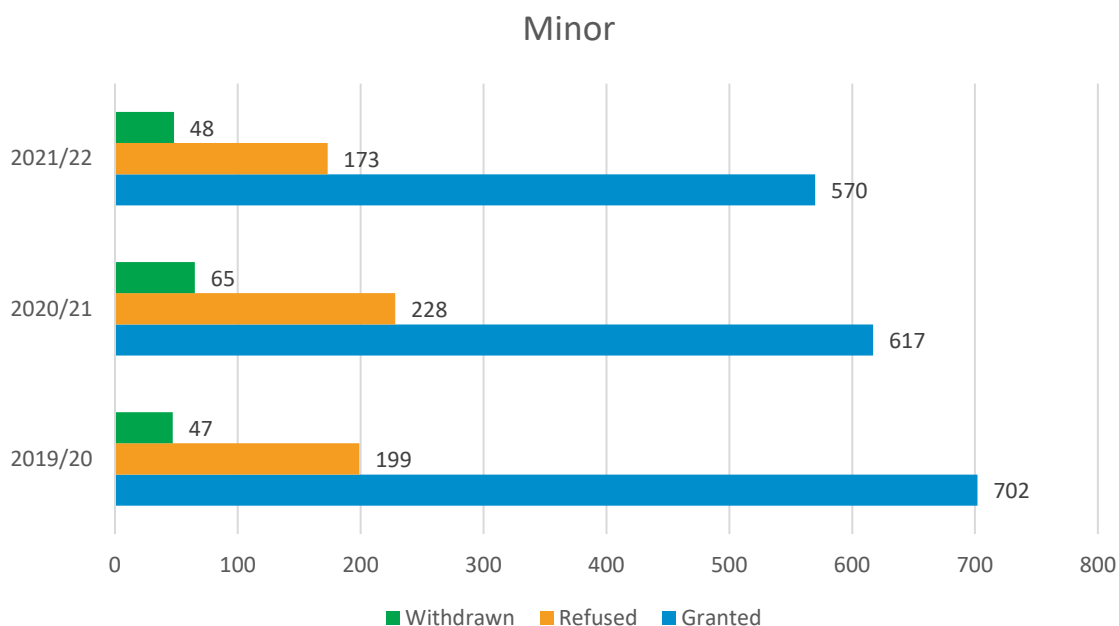
2.18 Sevenoaks is recognised as having one of the busiest planning departments in Kent. The table below sets out the Council's performance over the previous 3 years in relation to the number of planning applications determined within statutory time limits. The table shows that the Council has consistently had high percentages of determination of planning applications in time.

Year	Majors	Minors
2019/20	95.65%	76.83%
2020/21	89.29%	83.80%
2021/22	92.59%	80.24%

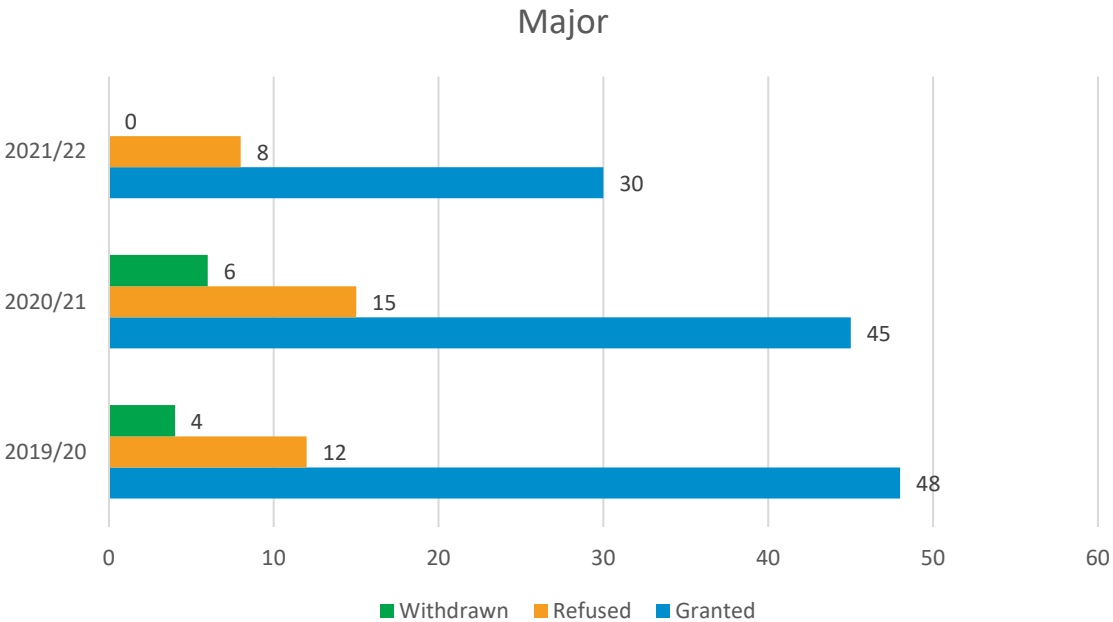
2.19 Therefore, in this respect the Council is working well towards increasing the delivery of suitable sites across the District. It is worth noting that despite impacts of Covid-19 the Council is consistently determining planning applications in a timely manner.

## Proportion of planning applications approved

2.20 The number of major and minor planning applications granted, refused or withdrawn are set out in the bar charts below.



In 2019/20 two minor planning applications were declined to be entertained (as set out in Section 70B of the Town and Country Planning Act 1990).



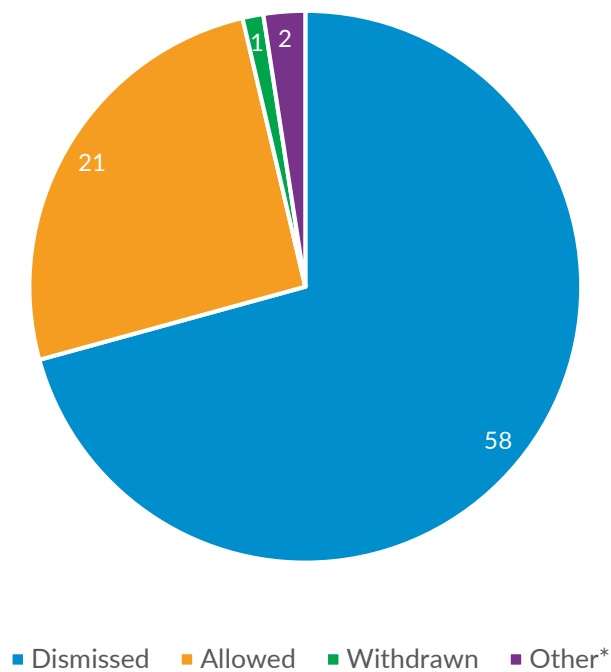
2.21 The majority of major and minor planning applications are granted planning permission. However, once planning permission is granted and conditions are discharged, the Council has little control over the build out of the approved dwellings. A process of contacting developers of larger sites is being undertaken as part of improved monitoring. This allows the Council to identify any issues stalling delivery on site.

# Planning Appeals

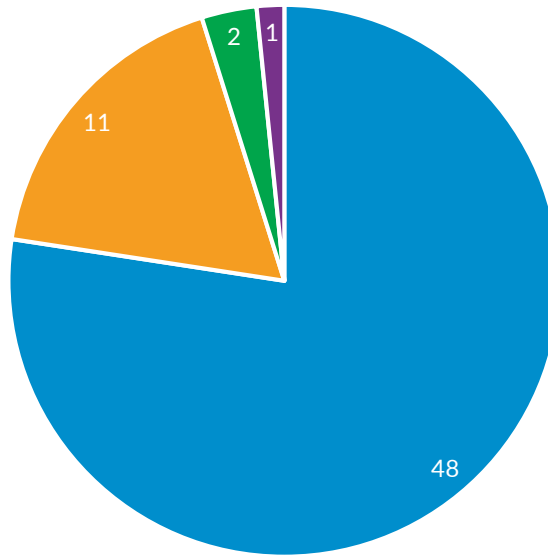
2.22 Overall, only a small proportion of planning applications go through to appeal every year. In each year most of these appeals are dismissed and a much smaller proportion of appeals are allowed. In the past year the total number of planning appeals has reduced in comparison to the two previous years. The three pie charts below show the outcome of all appeals over the past three financial years.

*\*Other includes 1 split decision and 1 decision overturned by High Court*

**2019/20 - Total Appeals = 82**

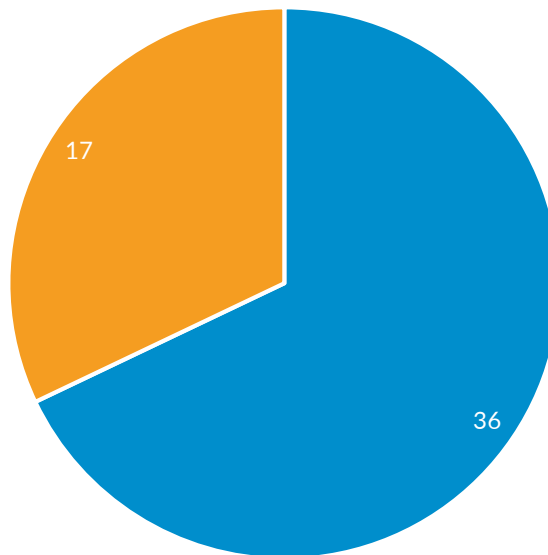


2020/21 - Total Appeals = 62



■ Dismissed ■ Allowed ■ Withdrawn ■ Split Decision

2021/22 - Total Appeals = 53



■ Dismissed ■ Allowed

## Planning Committee

2.23 The number of applications recommended for approval overturned at planning committee over the past three years are set out in the table below.

	2019/20	2020/21	2021/22
Total number of applications that went to planning committee	35	49	44
Number of officer recommendations overturned	9	12	10

2.24 The majority of officer recommendations made to committee are not overturned. All Members are provided training on a regular basis. Training is on all aspects of planning by Planning Officers to help in their understanding of planning processes and to inform decisions regarding planning applications and at planning committee. This allows Members to continue to make informed decisions at planning committee. Following from our last action plan the frequency of member training has increased. In addition, with the move to online training meetings the sessions have been well attended and received positive feedback from Members. Additional sessions are also held to review appeal decisions which were heard at committee to discuss how the Planning Inspector considered the appeal.

## Validation and conditions attached to planning permissions

2.25 The Council's Validation Team is fast and effective at validating planning applications, and therefore, this part of the service is working well towards the delivery of housing in the District. The Council recognises the importance of ensuring all relevant information pertinent to an application is submitted at the time the application is made to reduce the number of conditions and prevent unnecessary delay. Therefore, the Validation Checklist is regularly updated with support from development management and planning policy teams to ensure it remains up to date and effective.

2.26 Planning conditions are attached to planning permissions in line with national policy and guidance. The Council uses a pool of planning conditions which are applied on a case by case basis and tailored to fit the proposal, to ensure they are enforceable. These conditions are under continuous review. The Council recognises the impact that overuse of planning conditions can have and seeks to apply only those that are necessary. It is recognised that when used properly, conditions can enable a development to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating any adverse effects.

2.27 The Council will also use informatives attached to a decision so that the applicant is aware of issues that are not suitable to be resolved by condition. This ensures Members concerns are addressed when deciding an application at planning committee and prevents the potential for the application to be overturned at appeal at a later date.

## Community Infrastructure Levy (CIL) and Section 106 Agreements

2.28 The Council is noted as being impressive when it comes to CIL procedures as it is well managed and understood by all levels of the Council. Our procedures are included in the PAS pilot scheme for governance for developer contributions guidance notes. The Council has been recognised as an example of good practice with particular note to our interactive map and transparent reporting. In addition, a review by Inner Circle scored the Council at the highest level when it came to assessment of the CIL process.

2.29 The Council does not currently have an instalments policy and therefore full payment is expected within 60 days of commencement of development. A small number of developers have asked whether we have an instalments policy, but there has been insufficient evidence submitted to show non-viability as a result of this approach to date. We may however look to consider this issue over the next year. In addition to this, a small number of applicants have applied for phased development, which means, in line with the CIL Legislation that CIL is due at the commencement of each phase. This has helped address viability issues. The Government introduced an amendment to the CIL Regulations in July 2020 due to the impact of Covid that allowed small and medium sized developers to be able to defer their CIL payments or agree payments in instalments. This ended in July 2021. We only received one request to defer a CIL payment in this time.

2.30 A report was carried out for the Council (Local Plan and CIL Viability Study November 2018) this amongst other things considered the viability of CIL. The results of this report found that, the current level that CIL was charged at was still appropriate and therefore the current rate that CIL is charged at would not adversely impact on the viability of development. This still remains the case. It is considered that due to the changes proposed by the Government regarding introducing a single levy that we may reconsider the viability element at this stage when more information is provided as to how this is implemented.

2.31 The priorities of our CIL expenditure will continue to be monitored annually. In particular, this will be through the work and assessments we carry out to provide the Infrastructure Funding Statements. This looks at our priorities for CIL funding against the CIL received. In addition, we will also continue to monitor CIL through our Infrastructure Delivery Plan as this is a working document which looks at our infrastructure needs and priorities. Monitoring by using both of these documents annually will ensure that we check that our CIL income our funding priorities are regularly reviewed. We will also continue to monitor our CIL spending and priorities through our annual governance review.



- 2.32 In terms of Section 106s, due to CIL being in place we no longer require monetary payments towards infrastructure to be provided through this format. However, it is recognised that some of the requirements of our Legal Agreements will impact on the viability of the scheme. For some of the larger sites, we will require the onsite provision of infrastructure for example, educational facilities, green infrastructure or community facilities and we will also try to secure new homes, affordable housing or management plans which will have an impact on the viability of the scheme.
- 2.33 We will continue to ensure that our Section 106 follows the policies in the Local Plan, as well as maintaining the same CIL charge as this will ensure that developments remain viable. We will also continue to review our CIL and Section 106 process in line with any Government changes to ensure that it remains up to date. We have also introduced a new system which enables us to manage and monitor the 106 requirements more efficiently.

## Housing Revenue Account, Joint Venture and Housing Company

- 2.34 The Council last had a Housing Revenue Account in 1989 before all social housing stock was transferred to West Kent Housing Association. Options for creating a new Housing Revenue Account as well as granting of funds to Registered Providers or forming a Joint Venture were considered by the Council. However, the Council opted for establishing a wholly owned not for profit Affordable Housing Company named Quercus Housing Limited, agreed by Full Council at its meeting on 21 November 2017, funded by Section 106 monies. To date, the company has delivered 24 affordable homes, including 15 'genuinely affordable' homes (affordable rented capped at LHA levels) since incorporation of the company in April 2018.
- 2.35 Quercus Housing remains ambitious in achieving the delivery of affordable homes in the District and is seeking a longer term position to support this ambition and develop a project pipeline for the next 10 years. These sites would enable Quercus Housing to meet its 'massive small' delivery ambitions to support small sites to play a more meaningful role in the District's affordable housing delivery, including Council-owned sites.

## Resourcing

- 2.36 It is an increasingly challenging environment to recruit and retain planners, in particular senior and principal planners. Sevenoaks District Council is a Platinum Award winning Investors in People employer since January 2016, the first council and public sector employer to be accredited with this award. The Council is proactive in its approach to recruiting, for example the creation of a specific recruitment video and supporting

internal movement. The Council also offers training opportunities, such as apprenticeships and university schemes.

## Council owned land

2.37 The Council's new Housing Strategy 2022-2027 sets out four strategic priorities towards providing a good mix of decent and affordable housing across tenures including consideration of the Council's remaining surplus land for housing. The Council's Property team continue to consider whether there is any Council owned land that could be suitable for housing development in the future. Opportunities for Rural Exceptions sites are also put forward on Council Owned land in conjunction with the relevant Parish Council to deliver affordable local needs housing in the District.

## Compulsory Purchase of sites

2.38 So far the level of interest expressed for Compulsory Purchase of sites has not led to CPOs being made by the Council. The Council would consider Compulsory Purchase on a site by site basis, including consideration of the viability of purchasing a site.

## Developers and landowners forums

2.39 In previous years the Council has held an annual developers' forum. Currently, the Council meets with individual developers on a periodic basis and is considering new and innovative ways to re-introduce the developer's forum, to cover both planning policy and development management issues. It is also noted that the Council's Building Control team have good relationships with developers and landowners acting in the District. Overall, the Council is committed to having good working relationships with developers, agents and landowners.

2.40 The Council is actively seeking and working with landowners for opportunities to make best use of the land. A significant proportion of land in the District is owned by a small number of estates. The Council holds a Rural Landowners Forum on a regular basis to explore opportunities to deliver housing in the District with these landowners.

## Planning Performance Agreements (PPAs)

2.41 The Council have some formal Planning Performance Agreement (PPAs) in place for larger schemes. The Council continues to actively promote the use of PPAs for the larger schemes coming through the Development Management process,

# Covid-19

2.42 It is clear that the effects of Covid-19 have had a significant and far reaching impact for the house building industry across the nation, including in Sevenoaks. This is particularly relevant at the current time with many people moving out of cities in search of larger dwellings with outdoor space. As Sevenoaks District shares borders with Greater London and has good transport links with the city this is likely to have a significant impact, this is supported by anecdotal evidence from the local property market. Updated evidence bases will consider this aspect alongside changing work patterns in preparation of a new local plan.

## Key Findings, Measures to Improve Delivery and Monitoring

4.1 The root analysis highlights that there are some factors which may affect delivery in the District. Action on these issues could go towards increasing the delivery of sites for housing. These factors are identified as:

- Delay in adopting new Local Plan
- Skills gap – difficulty recruiting and retaining, in particular, senior/principal planners
- Complexities of developing brownfield sites
- Effects of Covid-19 pandemic
- Out of date density and phasing of ADMP site allocations due to unforeseen delay in adopting new Local Plan
- Constrained nature of the District
- Lack of control over delivery on site following grant of permission and discharge of relevant conditions.

4.2 Some of the issues identified above are directly within the Council's control and other elements are not. The Council has control over the delivery of its own sites and affordable housing through the Council owned companies Quercus 7 and Quercus Housing. The Council also has control in its ability to process and determine planning applications for housing developments. However, once planning permission has been granted the Council has less control over delivery on a site. Where elements are outside of the Council's control it will require involvement of other stakeholders and partnership working to move towards increasing delivery of housing.

4.3 Furthermore, the District is subject to areas and assets of particular importance including 93% Green Belt and 60% AONB as well as designated heritage assets, other heritage assets and areas of archaeological importance. Therefore, there are significant

constraints which impact on the number of suitable sites for housing in the District. It is noted that adoption of a new local plan will significantly improve this situation.

## Measures already in place

4.4 The Council has a number of measures already in place to boost the delivery of sites for housing including the following:

- Council owned company Quercus 7 is actively seeking sites to provide housing in the District.
- Council owned company Quercus Housing is actively providing affordable housing in the District.
- The Council continuously reviews planning conditions imposed on planning permissions to avoid unnecessary stall to development.
- Updated evidence bases currently being pursued would seek to increase housing in the District.
- Effective Use of Planning Performance Agreements
- Innovative recruitment schemes
- The Council is currently undertaking evidence to identify sites within existing built up areas outside of the Green Belt to increase the number of sustainable sites for housing.
- The Council works closely with developers to ensure that the density of housing on a site makes the most efficient use of land.

# Monitoring

The following table sets out updates on the August 2021 Housing Delivery Test Action Plan measures:

Action	Update
Adoption of the new Local Plan	A new local plan timetable (Local Development Scheme) has recently been adopted.
Reintroduction of Developer Forums	This work has been put on hold and will be reconsidered following changing of work patterns after Covid-19.
Council owned companies to deliver sites and affordable housing	Quercus 7 and Quercus Housing are continuously considering available and suitable sites.
Incorporate housing delivery discussions in duty to co-operate meetings with neighbouring authorities	Housing delivery discussions are incorporated in all duty to co-operate meetings.
Review of conditions attached to planning permissions	Conditions attached to planning decisions are continuously being reviewed as necessary.
Follow up with landowners/developers/agents following grant of planning permission	This has been incorporated into new monitoring procedures to follow up with larger sites to understand any barriers to delivering on site and to assist where we can to overcome them.
Review sites on the Brownfield Register	The Brownfield Land Register is updated annually and updates are made periodically if required.
Develop Design Guidance for sites on the Brownfield Register	Work has begun on this action with the production of a District wide characterisation study. The outcome of this will allow us to give design guidance to brownfield sites.
New call for sites, update SHELAA and produce interactive map	A call for sites has been undertaken and work has begun on updating an urban SHELAA which will be published later this year.
Member training	Member training on all planning topics is ongoing including additional session to discuss appeal decisions overturned at Development Control committee. The sessions are well attended and receive positive feedback from members.
Training for Town & Parish Councils and Residents Associations	Training is already offered on an ad hoc basis and there is scope to host more regular sessions going forward. A Town and Parish Council Forum is planned for Autumn 2022 as part of the forthcoming consultation on the emerging Local Plan.
Introduce PPA procedure	Due to the constrained nature of the district the number of larger sites are small. Consideration of

Action	Update
	whether a PPA is appropriate is made on a case by case basis.
Update validation checklist	The validation checklist continues to be updated as necessary.
Review of CIL charging schedule	The CIL charging schedule continues to be considered as necessary.
Annual review of Section 106	Review of Section 106 continues on an annual basis.

# Action Plan

The table below sets out measures to improve delivery which can be taken by the Council, how they will be implemented, by whom and when.

Action	How	Who	When
Adoption of the new Local Plan	Take a new Local Plan through examination and through to adoption	Planning Policy, PINS	Ongoing
Reintroduction of Developer Forums	Explore ways to re-introduce developer forums whilst maintaining service performance	Development Management, Planning Policy	Ongoing discussions
Council owned companies to deliver sites and affordable housing	Proactively look for suitable sites to deliver affordable housing	Property Management, Planning Policy, Development Management, Quercus 7, Quercus Housing	Ongoing, both companies are actively seeking sites
Incorporate housing delivery discussions in Duty to Co-operate meetings with neighbouring authorities	Include discussions in regular meetings	Planning Policy	Ongoing, during regular meetings
Review of conditions attached to planning permissions	The Council are already mindful that conditions need to be appropriate and we continue to work with members on this topic.	Development Management, Planning Policy	Ongoing
Follow up with landowners/developers/agents following grant of planning permission	Develop procedure for contacting sites and implement	Planning Policy	Ongoing

Action	How	Who	When
Review sites on the Brownfield Register	Update and add sites. Consider moving sites onto Part 2	Planning Policy	Annually (December)
Develop Design Guidance for sites on the Brownfield Register	Assess appropriate sites for design guidance & publish on Council's website	Planning Policy, Conservation and Design	To be reviewed once the Characterisation Study is complete
Update SHELAA following recent call for sites and produce interactive map	Undertake SHELAA update and publish on Council's website	Planning Policy	In line with updated Local Development Scheme
Member training	Officers conduct training for all, Members but specifically those sitting on planning committee.	Planning Policy, Development Management	Ongoing
Training for Town & Parish Councils and Residents Associations.	Training is already offered on an ad hoc basis and there is scope to host more regular sessions going forward. A Town and Parish Council Forum is planned for Autumn 2022 as part of the forthcoming consultation on the emerging Local Plan.	Planning Policy, Development Management	Ongoing
Introduce PPA procedure	Develop and implement procedure for PPA's on strategic sites	Planning Policy, Development Management	Ongoing
Update validation checklist	Update existing checklist to meet requirements	Planning Policy, Development Management, Validation Team	As required



Action	How	Who	When
Review of CIL charging schedule	Review of CIL charging schedule and approach to larger sites, explore CIL instalments policy	Planning Policy	Ongoing
Annual review of Section 106	Annual review of Section 106	Planning policy	Ongoing annually

4.5 Monitoring of this action plan will be ongoing by the relevant teams at the Council. The Council will continue to work with relevant stakeholders throughout the delivery of sites for housing in the District. This action plan will run until the next results of the Housing Delivery Test are published and will be updated as necessary to reflect future HDT result.

