

# Housing Delivery Test Action Plan

**Sevenoaks District Council**

**Housing Delivery Test 2022 Measurement**

HDT Results Published: 19 December 2023

**June 2024**

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## Executive Summary

This Action Plan explores the reasons for under delivery of housing in Sevenoaks District, which have been identified through the Housing Delivery Test (HDT) results for 2022, which were published by DLUHC on 19 December 2023.

The result for Sevenoaks District is that 51% of the required amount of housing has been delivered in the District, which means that an Action Plan must be produced. The Council should also include a 20% buffer in the current 5 year housing land supply requirements and apply the presumption in favour of sustainable development

This Action Plan finds areas of improvement and aspects where the Council is already working towards increasing delivery, through root cause analysis of different aspects of the planning process.

Actions in the Council's control are set out with an aim to improve housing delivery. Headline actions include:

- Adoption of a new Local Plan for Sevenoaks District
- Increased training and discussion around Housing Delivery Test
- Development of additional guidance and research
- Upkeep and improvement of existing processes and procedures

## 1. 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, in paragraph 60, 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 79 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 National Landscapes. 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 2022 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a three-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 as local planning authorities and construction industry faced disruption on a national, regional, and local level due to the pandemic. Additionally, an 11-month period has been used for the 2019/20 monitoring year. This was to account for disruption to housing delivery and monitoring caused by the first national lockdown in March 2020. No adjustment was made in the 2021/22 monitoring year.
- 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: 2022 measurement published by DLUHC on 19 December 2023.

	2019/20	2020/21	2021/22
Annual Core Strategy Target	165	165	165
Number of Homes Required	647	473	715
Number of Homes Delivered	414	216	310

- 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 previous 3 years	HDT Result
2020	1,858	1,302	70%
2021	1,828	1,130	62%
2022	1,835	940	51%

- 1.11.** The HDT measurement result for Sevenoaks District Council is 51%, this means that 51% 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 77 of the NPPF.
- 1.12.** The action plan, at the end of this document, is considered proportionate to the level of delivery in the District.

## Significance of delivering housing in Sevenoaks District

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

- 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.
- Availability of suitable housing for an increasing ageing population;
- Avoiding the out-migration of younger and economically active groups through delivery of suitable housing;
- Increased prospects of people being able to own their own home;

## 2. Root Cause Analysis

### Constrained Nature of Sevenoaks District

- 2.1. Sevenoaks District is the second most constrained local authority in England with 92.9% of the District's land being constrained, second only to Tandridge District with 93.9%. This was acknowledged in data published as part of the "Local Authority Green Belt Statistics for England: 2022 to 2023" by DLUHC in October 2023.
- 2.2. Updates to the NPPF (December 2023) and the publication of the Levelling Up and Regeneration Act (LURA), which received royal assent on 26 October 2023, both include pivotal updates to the national approach to housing delivery and the consideration of Green Belt land as a constraint. Given that planning practice guidance and other supporting policy is still to be updated, notwithstanding that the outcome of the general election on 4 July 2024 may change the political approach to planning, there is much uncertainty as to the impact any changes will have on plan preparation in Sevenoaks District. 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

- 2.3. The Council has signed statements of common ground with all of its neighbouring authorities which set 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. Statements of Common Ground will be updated as Plan 2040 progresses towards examination.
- 2.4. In relation to the 'Housing Delivery Test: 2022 measurement', published by DLUHC on 19 December 2023, of the 8 authorities that share a boundary with Sevenoaks District:
  - Bromley, Gravesham, Tandridge and Tonbridge & Malling, are required to apply the presumption in favour of sustainable development; (the same as SDC)
  - Wealden is required to apply a 20% buffer to their housing supply;
  - Bexley and Dartford are required to prepare an action plan; and
  - Tunbridge Wells is not required to take any action.
- 2.5. Common issues regarding housing, identified in signed Statements of Common Ground, include:
  - Constraints i.e. Green Belt, National Landscapes and heritage assets and conservation areas
  - High house and land prices
  - Migration from London
  - Flood risk
  - Traffic congestion
  - Unable to meet full housing and affordable housing needs

2.6. 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

2.7. The ADMP allocates 16 residential sites and 7 mixed use sites, a total of 23 sites. Of these 23 sites 15 have received planning permission since its adoption in 2015. It is intended that, subject to reconfirming deliverability, the remaining 9 sites will be carried forward into the emerging Local Plan.

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

Site Reference	Address	Status
H1a	Car Park, Hitchin Hatch Lane, Sevenoaks	Completed - hotel
H1d	School House, Oak Lane and Hopgarden 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
H2d	Station Approach, Edenbridge	Permissioned – 38 dwellings
H2f	Powder Mills, Leigh	Completed - 49 dwellings
EMP3	Fort Halstead	Permissioned – Hybrid application for up to 625 dwellings



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

Site Reference	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)
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 Hopgarden Lane, Sevenoaks	Years 6-10 (2017-2021) (northern part of site) – No longer being promoted.
H1e	Johnsons, Oak Lane and Hopgarden Lane, Sevenoaks	Years 6-10 (2017-2021) – No longer being promoted.
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)
H2e	New Ash Green Village Centre, New Ash Green	Years 10-15 (2022-2026)

**2.10.** 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. Unless otherwise stated above, 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.

## Plan 2040 (Emerging Local Plan)

- 2.11.** In 2021, 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).
- 2.12.** 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 National Landscapes (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.
- 2.13.** 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.
- 2.14.** The Council is currently working on a new local plan for Sevenoaks District (Plan 2040). An initial Regulation 18 consultation took place in Autumn 2022 on the potential for new development in non-Green Belt locations. This approach reinforced 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.
- 2.15.** A second Regulation 18 consultation took place in Autumn 2023 which looked at the potential for development in the Green Belt, in suitable and sustainable locations, close to existing top-tier settlements, as defined by the Settlement Hierarchy 2022.
- 2.16.** A Regulation 19 is scheduled to take place later this year, with submission to the Planning Inspectorate for Examination taking place prior to 30 June 2025. Regular updates on the local plan are set out at the Development and Conservation Advisory Committee, the minutes of which are publicly available on our website.

## Five Year Housing Land Supply

- 2.17.** Paragraphs 76-77 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 (2022) for Sevenoaks indicates that the District is currently delivering 51% of housing 'need', and therefore, as set out in paragraph 77 of the NPPF, the Council must apply a 20% buffer.

- 2.18.** 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.
- 2.19.** The NPPF 2023 introduced a reduction of the 5YHLS to a 4YHLS, where a Local Authority has either submitted a Local Plan for examination or has reached Regulation 18 or Regulation 19 Consultation Stage, and the Local Plan includes both a Policies Map and proposed allocations towards meeting housing need. SDC is currently preparing for a Regulation 19 consultation and therefore, the next update to the District's Housing Land Supply will be reduced to a 4YHLS. Given the HDT Results (2022) for Sevenoaks of 51%, the Housing Land Supply statement will include a 20% buffer.

## **Brownfield Register and Permission in Principle**

- 2.20.** 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. Given the highly constrained nature of the District, the Council's Brownfield Register plays a vital role in identifying suitable sites for housing. 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.
- 2.21.** The Brownfield Register has a number of sites within urban confines that are not subject to Green Belt policy. The 2022 HDT Action Plan highlighted that the Council was undertaking a District-wide Characterisation Study, in light of the 2021 action plan proposal that design guidance was provided for urban sites to encourage them to come forward. The work on the District-wide Characterisation Study has now been completed and is available on the Council's evidence base webpage for Plan 2040. This study provides guidance towards what might constitute appropriate design for different areas of the District and additional information for any future design guidance including sites in the brownfield register. This Study is also being used to inform Development Briefs for emerging Local Plan allocations. First stage Development Briefs for urban site allocations were prepared and published alongside the recent Regulation 18 Part 2 consultation, and are available to view on the Plan 2040 webpage.

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

- 2.22.** 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 was first 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. These results were published in the Regulation 18 Part 1 consultation in November 2022, and reflected in the urban SHELAA which accompanied the consultation.

**2.23.** The assessment of non-Green Belt sites was undertaken through a new Strategic Housing and Economic Land Availability Assessment (SHELAA), which was made available alongside the Regulation 18 Part 2 consultation, which ran from November 2023 – January 2024. As part of the Regulation 18 Part 2 consultation, a small number of additional sites were submitted and these will be assessed through an update to the SHELAA (Stage 3) which will be published later this year alongside the Regulation 19 consultation.

### Determination of Planning Applications

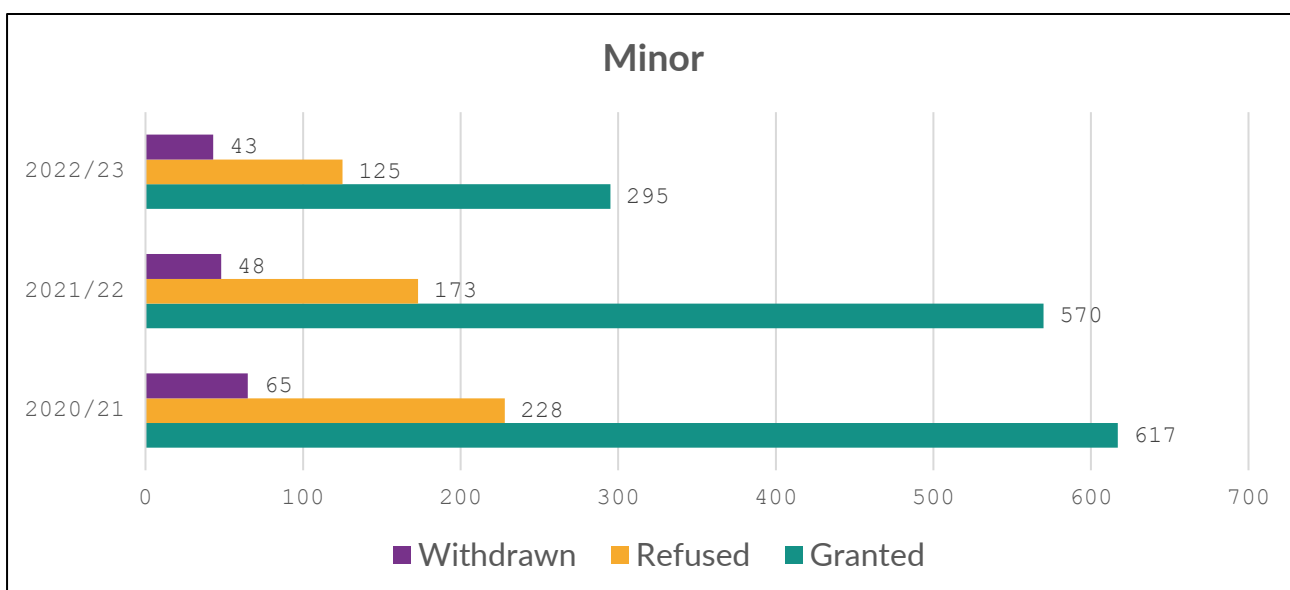
**2.24.** Sevenoaks is recognised as having one of the busiest planning departments in Kent, with an average of 715 applications being determined over the last 3 years. The table below sets out the Council's performance over the previous 3 years in relation to the number of planning applications determined within statutory time limits. The table shows that the Council has consistently had high percentages of determination of planning applications in time.

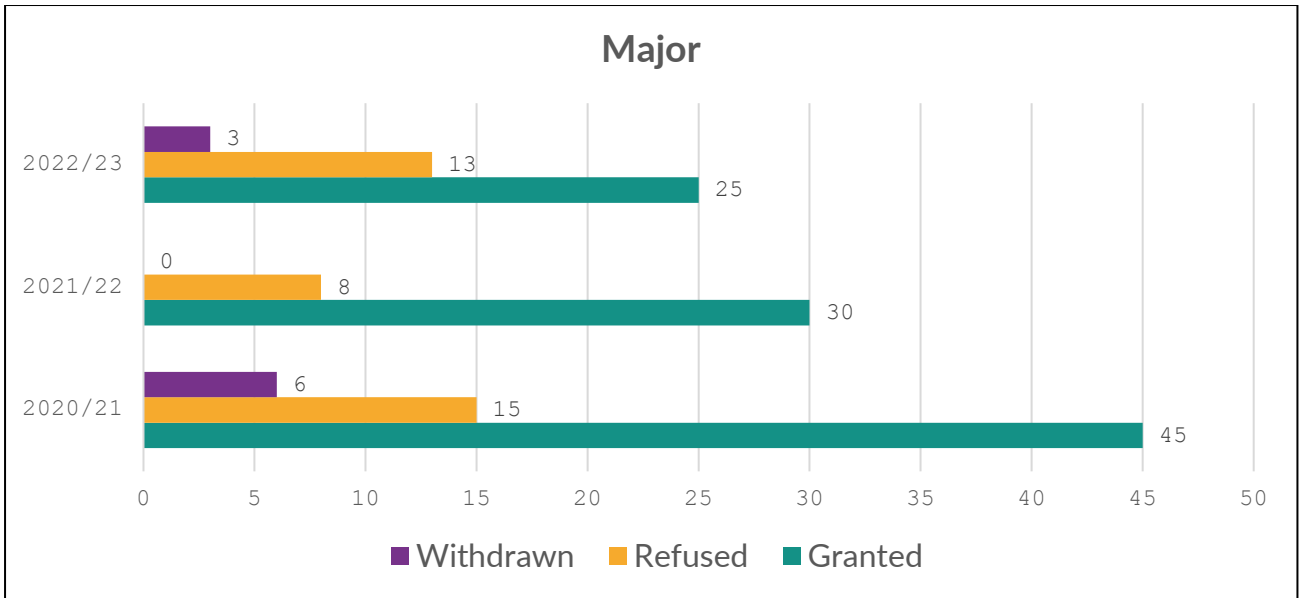
Year	Majors	Minors
2020/21	89.29%	83.80%
2021/22	92.59%	80.24%
2022/23	97.33%	87.76%

**2.25.** 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

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

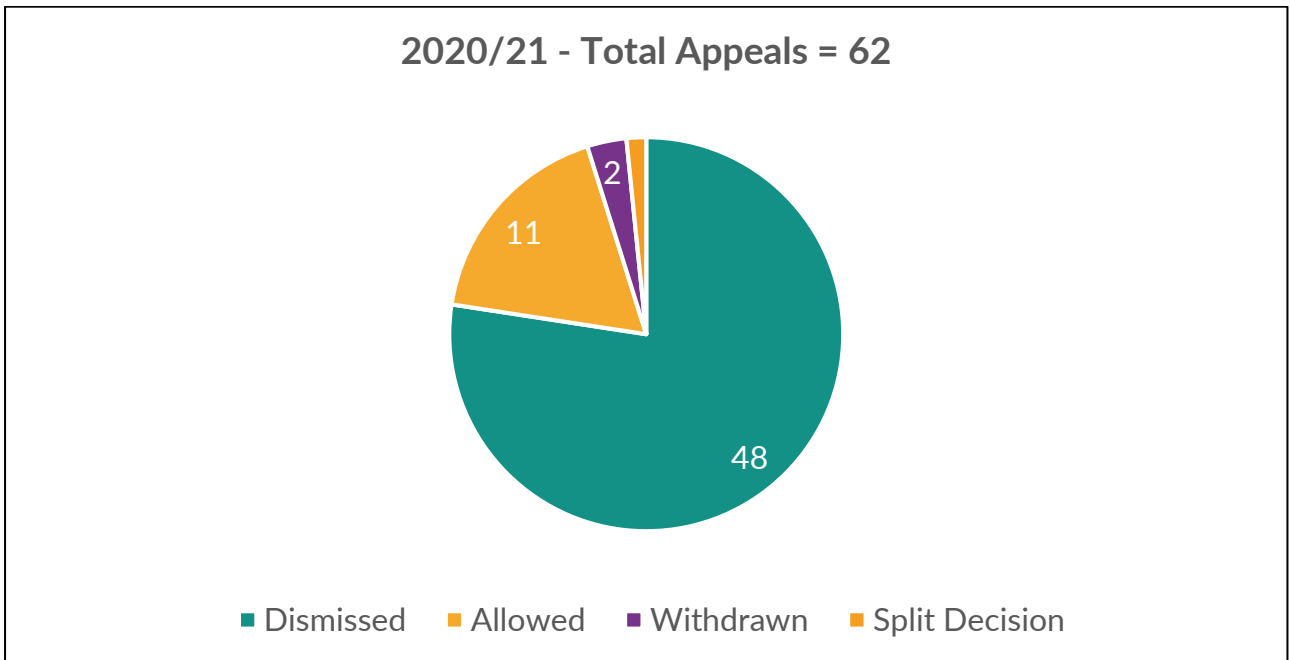




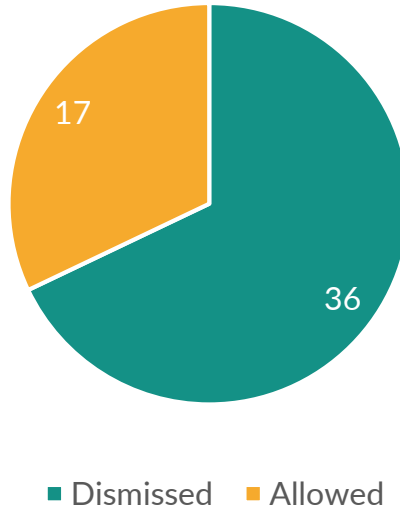
**2.27.** The majority of major and minor planning applications are granted planning permission. However, once planning permission is granted and conditions are discharged, the Council has little control over the build out of the approved dwellings. A process of contacting developers of larger sites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

### Planning Appeals

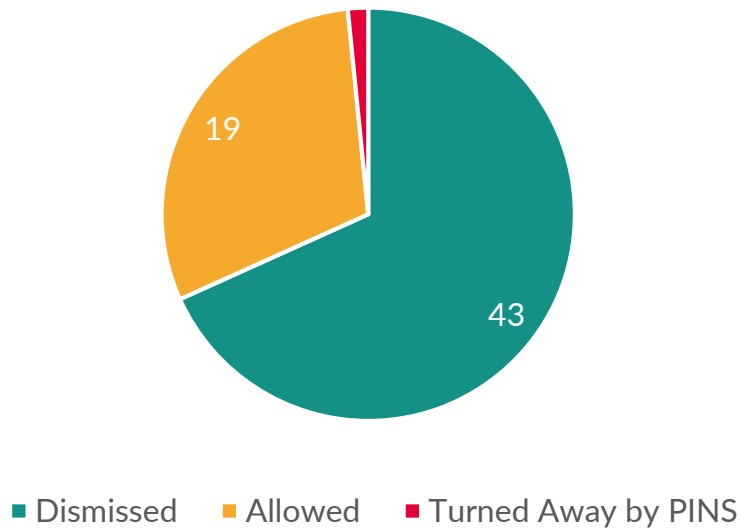
**2.28.** Overall, only a small proportion of planning applications go through to appeal every year. In each year most of these appeals are dismissed and a much smaller proportion of appeals are allowed. In the past year the total number of planning appeals has reduced in comparison to the two previous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



2021/22 - Total Appeals = 53



2022/23 - Total Appeals = 63



### Planning Committee

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

	2020/21	2021/22	2022/23
Total number of applications that went to planning committee	49	44	9
Number of officer recommendations overturned	12	10	6

2.30. 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

- 2.31.** 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.
- 2.32.** 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.
- 2.33.** 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

- 2.34.** 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.
- 2.35.** 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.

- 2.36.** 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. That said, the Council's CIL Charging Schedule was adopted in 2014 and has not been reviewed since. Given the ongoing production of the emerging Local Plan it is considered that this presents a good opportunity for CIL to be reviewed in parallel, to ensure it remains fit for purpose.
- 2.37.** 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.
- 2.38.** 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. Through the CIL Charging Schedule review, we will consider the viability of removing strategic sites from the CIL Charging Schedule and reverting to Section 106 on these sites to provide the appropriate on-site infrastructure and monetary payments, giving infrastructure providers greater certainty of funding opportunities.
- 2.39.** We will continue to ensure that our Section 106 follows the policies in the Local Plan, as well as reviewing the CIL charge to ensure that developments remain viable. We will also continue to review our CIL and Section 106 process in line with any Government changes, including a single levy, to ensure that it remains up to date. We are using a new system which enables us to manage and monitor the Section 106 requirements more efficiently.

## **Housing Revenue Account, Joint Venture and Housing Company**

- 2.40.** 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 56 affordable



homes, including 32 'genuinely affordable' homes (affordable rented capped at LHA levels) since incorporation of the company in April 2018.

- 2.41.** 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

- 2.42.** 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, which has proved to be a valuable tool in retaining and attracting high quality staff, alongside flexible working arrangements. 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

- 2.43.** The Council's Housing Strategy 2022-2027 sets out four strategic priorities towards providing a good mix of good quality 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, where appropriate.

## Compulsory Purchase Orders (CPOs)

- 2.44.** 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, in particular considering the viability of purchasing a site using taxpayer money.

## Developers and Landowners Forums

- 2.45.** Prior to the Covid-19 pandemic, 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.
- 2.46.** 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 and employment opportunities in the District with these landowners.

## Planning Performance Agreements (PPAs)

- 2.47.** 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

- 2.48.** 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.

### 3. Key Findings, Monitoring and Action Plans

3.1. 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:

- Constrained nature of the District
- Unsuccessful Local Plan examination in 2019, leading to delays in adopting a new Local Plan
- Out of date density and phasing of ADMP site allocations due to unforeseen delay in adopting new Local Plan
- Effects of Covid-19 pandemic
- Complexities of developing brownfield sites
- Skills gap – difficulty recruiting and retaining, in particular, senior/principal planners
- Inability for LPA's to ensure delivery on site, following grant of permission and discharge of relevant conditions in a timely manner.

3.2. 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 partnership working with other organisational bodies, or the implementation of additional national initiatives to allow LPA's additional controls, in order move towards increasing delivery of housing.

3.3. Furthermore, 94.5% of the District is highly constrained by areas and assets of particular importance, including 92.9% Green Belt and 60% National Landscapes (High Weald and Kent Downs) and 41 Conservation Areas, 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 implemented

3.4. 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 and Member training

- 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.

## Measures already in place

The following table sets out updates on the November 2022 Housing Delivery Test Action Plan measures:

Action	Update
Adoption of the new Local Plan	A new local plan timetable (Local Development Scheme) will be published shortly
Reintroduction of Developer Forums	Currently, the Council holds a Rural Landowners Forum and 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.
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.
Update SHELAA following recent call for sites and produce interactive map	A call for sites has been undertaken and a SHELAA for both urban and Green Belt sites was published alongside the Regulation 18 Part 2 consultation (November 2022). A Stage 3 update to the SHELAA will be published alongside the Regulation 19 consultation 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.

Action	Update
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. Town and Parish Council Forums are attended by the Strategic Planning team as part of ongoing work and consultation on the emerging Local Plan (Plan 2040).
Introduce PPA procedure	Due to the constrained nature of the district the number of larger sites are small. Consideration of 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	A review of CIL Charging Schedule is planned to take place alongside ongoing work for Regulation 19 consultation later this year.
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 Sevenoaks District Council, how they will be implemented, by whom and when.

Action	Update	Who	When
Adoption of the new Local Plan	Take a new Local Plan through examination and through to adoption	Planning Policy, PINS	Ongoing, and on target for submission by 30 June 2024
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 and funding to deliver them
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 through Monitoring work

Action	Update	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	Ongoing
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. Strategic Planning Officers attend Town and Parish Council Forum meetings as part of ongoing work and consultation on 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

Action	Update	Who	When
Update validation checklist	Update existing checklist to meet requirements	Planning Policy, Development Management, Validation Team	As required
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

3.5. 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.



