

Canterbury District 2019

Housing Delivery Test Action Plan



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1. Introduction

- 1.1. The National Planning Policy Framework sets out that plan makers should maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Local planning authorities should therefore identify five year housing land supply at all points during the plan period.
- 1.2. The Canterbury District Local Plan 2017 sets out the housing target of 16,000 new homes between 2011 - 2031 and was adopted in July 2017. The Council is committed to taking a proactive approach to housing delivery in the District and positively engages with the development industry and other delivery partners.
- 1.3. As part of the ongoing monitoring of the Local Plan Canterbury City Council monitors the progress of housing completions and sets out a five year supply of housing land coming forward by producing an annual Housing Land Supply Statement (an appendix to its Authority Monitoring Report). As part of this monitoring the Council carries out an assessment of when housing, either with planning permission or contained within the Local Plan, is expected to be built by analysing housing delivery data and specific engagement with housebuilders and other delivery stakeholders. The information set out in this document builds on the work already done to produce the annual Housing Land Supply Statement and wider engagement on delivery.
- 1.4. In 2018 the government introduced the Housing Delivery Test to determine a local authorities' performance in terms of delivering housing to meet its needs. The Housing Delivery Test is a % measurement of the number of net homes delivered against the number of homes required, as set out in the Canterbury District Local Plan, over a rolling three year period.
- 1.5. The results of the Housing Delivery Test for each local authority will be published by the government in November each year. The test is backward looking over a three year period and is used to determine the appropriate buffer to be applied to the 5 year supply calculation.
- 1.6. If the test results show that housing delivery falls short of the housing requirement, then a series of sanctions will apply depending upon the level of shortfall.
 - If delivery falls below 95% then an Action Plan must be published.
 - If it is below 85% then a 20% buffer should be added to the 5 year supply and an Action Plan must be published.
 - Finally if delivery falls below 45% (rising to 75% in 2020) then there is a presumption in favour of sustainable development until

the next HDT measurement results are released and an Action Plan must be published.

- 1.7. There are however transitional arrangements in place, whereby the presumption in favour of sustainable development will only apply where delivery falls below 45% following publication of Housing Delivery Test in 2019; and then 75% in all subsequent years.
- 1.8. The method for calculating the Housing Delivery Test measurement is set out in the [Housing Delivery Test Measurement Rule Book](#).
- 1.9. In 2017-18, Canterbury City Council achieved 117% against the requirement in the first Housing Delivery Test.
- 1.10. For the 2018/19 measurement Canterbury City Council achieved 87% in the Housing Delivery Test and is therefore required to produce this Action Plan.
- 1.11. The Council has long been alive to the importance of delivery and monitoring the developments within the Local Plan. In 2018 the 'Housing Delivery Group' was established and its members include developers, agents, house builders, SME house builders, affordable housing providers and utilities providers. One of the aims of the group is to identify any barriers to housing delivery and to gain first-hand experience of the current housing market.

2. Looking to the future

- 2.1. The Council is currently undertaking monitoring of the housing completions for the year 2019/20 which will inform the HDT 2020 measurement. Finalised completion figures are not at this point (July 2020) verified but the Council predicts it will be required to produce an Action Plan in 2020. The Council considers that preparation of an Action Plan provides a positive basis for the Council to support housing delivery in the district and so will be preparing one next year for the 2020 HDT measurement whether or not we are prepared to do so.
- 2.2. Further predictions on the HDT beyond 2020 are complex and unknown at present; the Coronavirus global pandemic has caused disruption to housing building and construction nationally with emerging indicators pointing towards a recessionary period. It is not yet known whether any recovery of the housing market will be swift or affected in the longer term. The Council will be monitoring the situation carefully and continue to work closely with the development industry. Through the root cause analysis potential effects and actions to support recovery have been considered; the Council sees this Action Plan as key to enabling the local recovery of housing delivery.

- 2.3. While it is too early to report precisely on what the local impacts of Covid and potential recessionary effects will be, early and locally targeted engagement with the development industry operating in the District indicates that the impacts of Covid 19 on delivery rates are unlikely to be severe with many developers predicting a return to usual market confidence, sales and build out rates within the current year. In response to Covid 19 the Council as, itself a local supplier of new homes with 'live' development projects such as Parham, Kingsmead Fields and Riverside have restarted to help maintain local construction sector confidence.
- 2.4. Monitoring evidence is beginning to demonstrate a bounce back. Emerging completion data shows the local construction industry has restarted and planning application levels have returned to normal.

3. The district and the local housing market

- 3.1. The Canterbury District is located in East Kent. It includes the historic City of Canterbury, the coastal towns of Herne Bay and Whitstable, attractive countryside and some 35 villages. The District has a rich built environment which has been recognised internationally by the designation of a World Heritage Site by UNESCO comprising the Cathedral, St Augustine's Abbey and St Martin's Church.
- 3.2. The natural environment is equally as rich with the Kent Downs Area of Outstanding Natural Beauty covering about a third of the District to the south, together with local landscape designations. The District is also extremely important for nature conservation with numerous Sites of Special Scientific Interest, Local Wildlife Sites, and Regionally Important Geological and Geomorphological Sites. Parts of the District are also covered by international designations such as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar.
- 3.3. The District is an important sub-regional employment centre in East Kent and both tourism and education form an important part of the local economy. Canterbury has a strong service and education sector with five higher and further education institutions.
- 3.4. This district has a buoyant and distinctive housing market, with sub market areas around each of the principal settlements of Canterbury, Herne Bay and Whitstable. Engagement with the Housing Delivery Group and other stakeholders continues to confirm the strength of the housing market within the district. In particular, the following is consistently confirmed:
 - There is an appetite for development in sustainable and suitable locations,

- Land and property sales values are good and above other East Kent areas,
- The district has an attractive environment which developers want to build in and people want to live here, and
- There are good transport connections within and beyond the district.

4. What has happened in the last 3yrs

- 4.1. The Housing Delivery Test is a backwards looking measurement and for the 2018/19 result, that this Action Plan responds to, the 3yr period from 2016/17 - 2018/19. There have been significant changes during this period and since to improve housing delivery undertaken by Canterbury City Council.
- 4.2. The Council has been at the forefront of developing and implementing the [Kent Planning Protocol](#) as well as being instrumental in the setting up of the University of Kent Planning school aimed at locally training and retaining highly skilled planners in the county.
- 4.3. The most significant change has stemmed from the adoption of the Canterbury District Local Plan in July 2017. The Local Plan provides the step change in housing delivery the Council has planned for and this will be reflected in future Housing Delivery Test measurements. The Local Plan allocates in excess of 16,000 homes and includes 12 Strategic Sites which will deliver over 10,000 dwellings over the lifetime of the plan.
- 4.4. The Local Plan allocates land for various land uses including housing and this provides certainty to both developers and the community as to where development is expected to come forward. This certainty is of significant benefit to both developers and the development industry in seeking finances and in securing planning permission. This is reflected in the progress of planning applications and the beginning of construction of homes on sites allocated within the Local Plan since its adoption.
- 4.5. Since the adoption of the Local Plan significant progress towards the delivery of the 12 Strategic Sites has been made; eight sites now having either an outline or detailed consent covering the whole or part of the site and are either delivering dwellings or expected to do so immediately. This will continue to improve both delivery rates and land supply going forward. A summary of the sites progress is set out below.

Site Name	Progress
Site 4 Herne Bay Golf Course	Delivering - The site has been under construction since 2017 and will continue delivering homes
Site 5 Strode Farm	Consented - The site has outline consent and is making progress towards delivery
Site 6 Greenhill	Consented - The site has outline consent and is making progress towards delivery
Site 7 Land North of Thanet Way	Consented - The site has detailed permission and delivery is imminent
Site 9 Howe Barracks	Delivering - The site has been under construction since 2018 and will continue delivering homes
Site 11A Cockerling Farm	Delivering - The site has been under construction since 2019 and will continue delivering homes
Site 11B Cockerling Farm	Consented - The site has detailed permission and delivery is imminent
Site 12 Grasmere	Consented - The site has whole or partial detailed permission and delivery is imminent

4.6. Progress made on the strategic sites is not the only significant change in the last three years related to the Local Plan in assisting development to progress through the planning stages. Both the Local Plan and a number of strategic sites have been subject to legal and judicial review processes which have resulted in delays to the delivery of these sites.

4.7. The judicial review launched against the Local Plan has taken more than two years but has now ended with the withdrawal of the case in early March 2020. In January 2019 a separate legal action against the

Secretary of State was also ended. That related to the government's decision not to call-in the largest of the strategic sites (Mountfield Park) planning application for further examination on air quality grounds, but it was comprehensively dismissed by the High Court and the Court of Appeal. The Supreme Court then refused the application for a further appeal, stating the application did "not raise an arguable point of law".

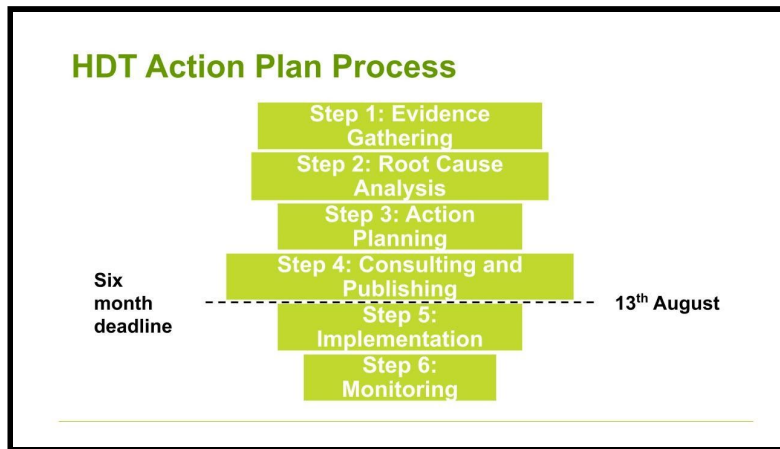
- 4.8. The Council considers current positions of both legal proceedings against the Local Plan and Mountfield Park facilitate progressing the hybrid planning application which once consented this year will enable significant and speedy delivery of homes.
- 4.9. There have also been a number of other legal challenges and appeals related to the strategic sites and the Council considers that these have impacted on the anticipated timescales involved in delivering housing.
- 4.10. Over the HDT measurement period 2015/6 - 17/18 the Council has invested in positive engagement with delivery stakeholders and undertaken significant analysis of housing delivery and how it thinks about land supply assessments. In 2018 the 'Housing Delivery Group' was established by the Council and its members include developers, agents, house builders, SME house builders, affordable housing providers and utilities providers. The group meets several times throughout the year as and when specific subjects arise. The group has been key to identifying any barriers to housing delivery and to gain first-hand experience of the current housing market. This has led to site specific solutions as well as wider understanding of the various stages of delivery and how this differed for the various site typologies and where there would be potential within the process to accelerate delivery. Overall the collaboration between stakeholders has been really positive.
- 4.11. The work undertaken by the group has led to the development of the Phasing Methodology to understand the build out rates of development in the district was published in 2018 and reviewed in 2019. The document can be read [here](#). As part of the ongoing engagement the Housing Delivery Group have been involved in developing these key assumptions on lead-in times and build out rates. The Council undertook consultation on the draft version of this document with the Housing Delivery Group with adjustments made in response to comments received following which the group signed off the document.
- 4.12. The Council uses the Phasing Methodology to inform its conclusion on whether housing sites, either those allocated for development in the Local Plan or those with a planning permission can be considered deliverable and whether that will be within the next 5yrs or whether they will take longer to develop. The Phasing Method also has a wider purpose as it drills down into localised housing delivery including any local root causes affecting delivery as well as what the expected

delivery rates of certain types of sites are; this results in a robust method of assessing the land supply pipeline.

- 4.13. The methodology sets out:
- When a site is considered deliverable in the context of the NPPF,
 - Any local root causes affecting delivery and potential solutions,
 - A review of national studies on delivery and comparison with local evidence,
 - An in depth analysis of local housing delivery rates including identifying and resolving local issues leading to the development of realistic local lead-in times and build out rates'
 - A set of assumptions related to lead-in times to be used in the land supply assessment, and
 - A set of assumptions related to build-rates to be used in the land supply assessment.
- 4.14. The creation of the Housing Delivery Group and the ongoing engagement within the development industry demonstrates the Council's commitment to ensuring the right homes are built in the right places. Both the group and the production of the Phasing Methodology are significant steps taken by the Council to improve housing delivery within the 3yr HDT period and beyond.
- 4.15. As part of the Council's proactive work on improving delivery it has implemented a number of internal practices and procedures such as
- Providing a comprehensive pre-application service and encouraging hybrid applications,
 - Focused internal practices on strategic development sites via a project team approach to managing strategic sites with regular meetings to monitor progress at all stages from early pre-application discussions to the completion of the project; this also reduces the risk of legal challenge; and
 - Having a dedicated resource for dealing with and monitoring the post consent delivery period such as applications for submission of details, discharging conditions, non-material amendments and variation applications.

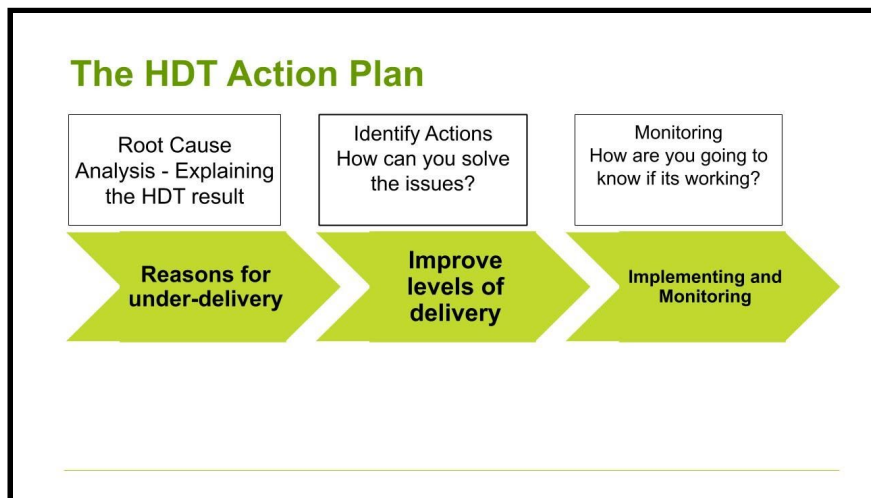
5. Steps to produce an action plan

- 5.1. There are set steps involved in producing an action plan which are set out in guidance produced by the Planning Advisory Service alongside some suggested processes in the PPG.



5.2. The 6 steps set out the process. There are essentially three stages involved

- Identifying why under delivery has occurred
- What are the actions needed to address them
- How can this be monitored



5.3. As already stated the Council has taken steps to improve housing delivery and therefore much of the analysis of the root causes and barriers to delivery had already been undertaken.

6. Stakeholder Engagement

6.1. As part of the investigation into the HDT result the Council has tested some of the emerging root cause analysis and potential actions with delivery stakeholders. This has been to ensure all issues have been captured by the Action Plan and that it contains impactful actions and solutions

6.2. On the 22nd and 23rd June 2020 a succession of intimate bespoke sessions with the Housing Delivery Group were undertaken. Due to the

logistics of holding virtual meetings during the pandemic the discussion sessions were held with the various sectors of the development industry represented in the Housing Delivery Group including housebuilders, developers, SME builders, land promoters & agents.

- 6.3. The sessions highlighted a number of issues and potential actions
- Performance and quality of the planning service is high and should be maintained and protected. The service has adapted extremely well in the pandemic.
 - Building materials availability remains a barrier and whilst the post consent service is good, additional flexibility around material samples would be beneficial.
 - Locally the development industry is moving back to construction and the effects of the pandemic are likely to be less than seen elsewhere due to the strong housing market. Future longer term predictions are harder to make.
 - The Call for Sites process was easy to use and seen as a key step in the Local Plan review process.
 - Market demand for non-residential uses has changed and a review of existing allocations should form part of the review process.
- 6.4. Additional stakeholder engagement was also conducted as part of the gathering of housing completion and phasing data in the annual housing monitoring processes. All developers, agents and applicants of sites over 10 dwellings were contacted and their views captured via a survey on what the main issues affecting delivery are and how they can be addressed.
- 6.5. The outcomes of both the Housing Delivery Group sessions and the views captured by the survey are in Appendix 1.
- 6.6. A meeting examining delivery issues the Council, as a developer faces, made up of all departments involved in housing, highlighted that the development of an Asset Management Plan will help direct focus on suitable land holdings as well as maximise the opportunity to increase delivery of housing.

7. Root Cause Analysis

- 7.1. The Council has undertaken a thorough root cause analysis to understand the delivery picture in the district and to interrogate the HDT result.

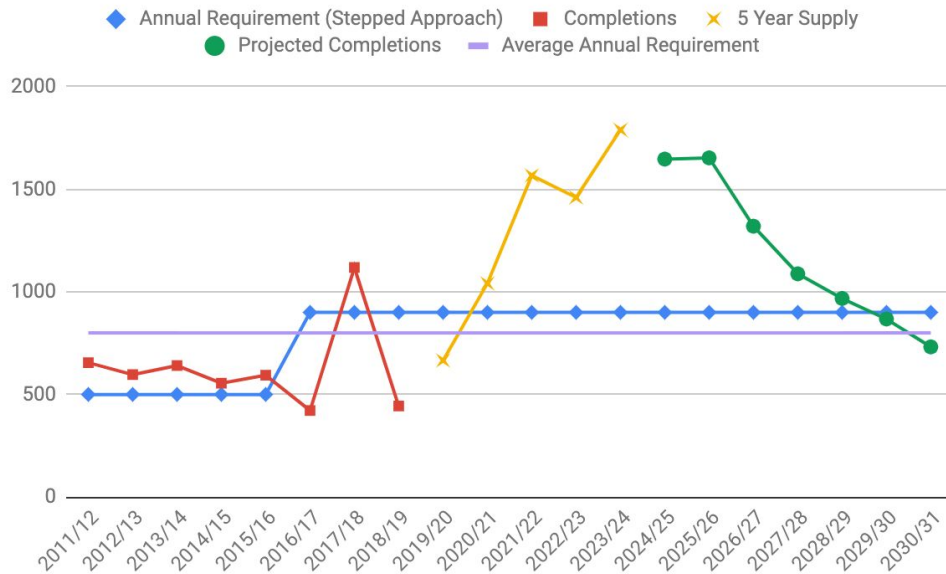
- 7.2. The root cause analysis looked at the factors that have the potential to affect housing delivery, including:
- The policy context.
 - The typologies of sites allocated.
 - The types of developers and housebuilders delivering in the district.
 - Looking at issues related to land purchase and development costs, inputs and viability.
 - Looking at allocated sites yet to be submitted or achieve a detailed consent and exploring the reasons why.
 - Reviewing sites with an extant planning permission which have not yet commenced and exploring the reasons why.
 - Analysing approval rates and determination periods of planning applications
 - Analysing the post consent period between consent and construction.
 - Reviewing the number and type of conditions and planning obligations on consented development.
- 7.3. The analysis has identified the root causes affecting delivery and these have been explored with delivery stakeholders. The analysis falls into these categories
- Delivery and Supply
 - Development Management
 - Policy and the Local Plan review
 - Direct delivery
- 7.4. The root causes and evidence gathered are set out in Appendix 2: Root Causes Table.

8. Record of Delivery, Completions and Supply

- 8.1. As previously stated this Action Plan is being prepared due to a reduction in delivery. The Council considers this reduction is not significant and therefore root causes will be reflective of that scale. The Council has a good record of delivery and has consistently achieved its delivery requirement. In 2018 a HDT measure of 117% was achieved. In the HDT 2019 measure the Council has still achieved a substantial rate of delivery at 87%.
- 8.2. Analysis of the land supply anticipated to come forward shows that housing delivery will continue to improve as the sites allocated within the Local plan come forward to construction and completion.
- 8.3. The Council has consistently been able to demonstrate a housing land supply of over 5yr. In the 2018/19 Authority Monitoring Report the Council was able to demonstrate a land supply of 6.7yrs.

8.4. Fig A below shows the housing trajectory; this shows the delivery rates being met and the forward supply.

Figure A: Land Supply Trajectory

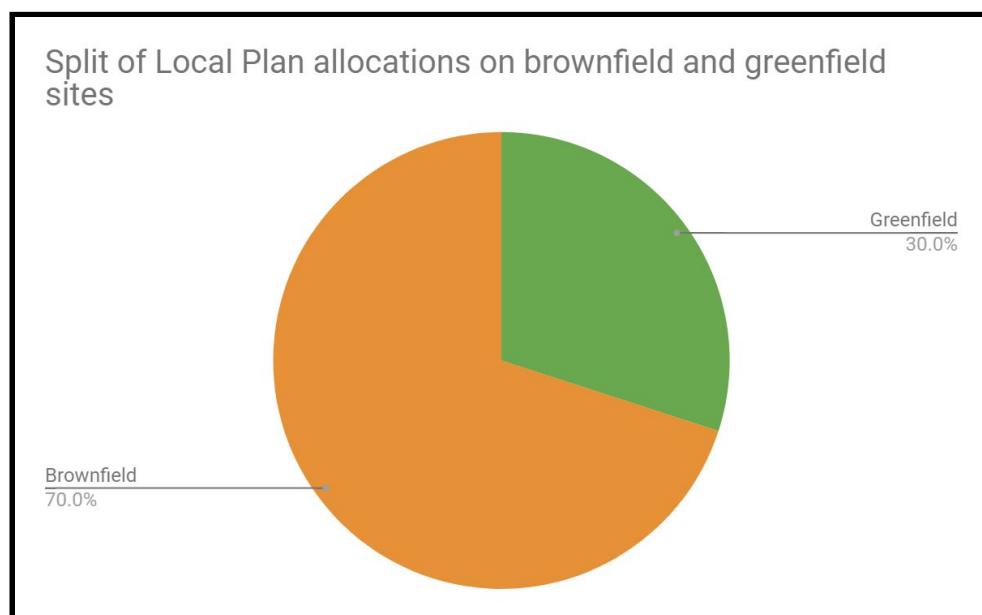


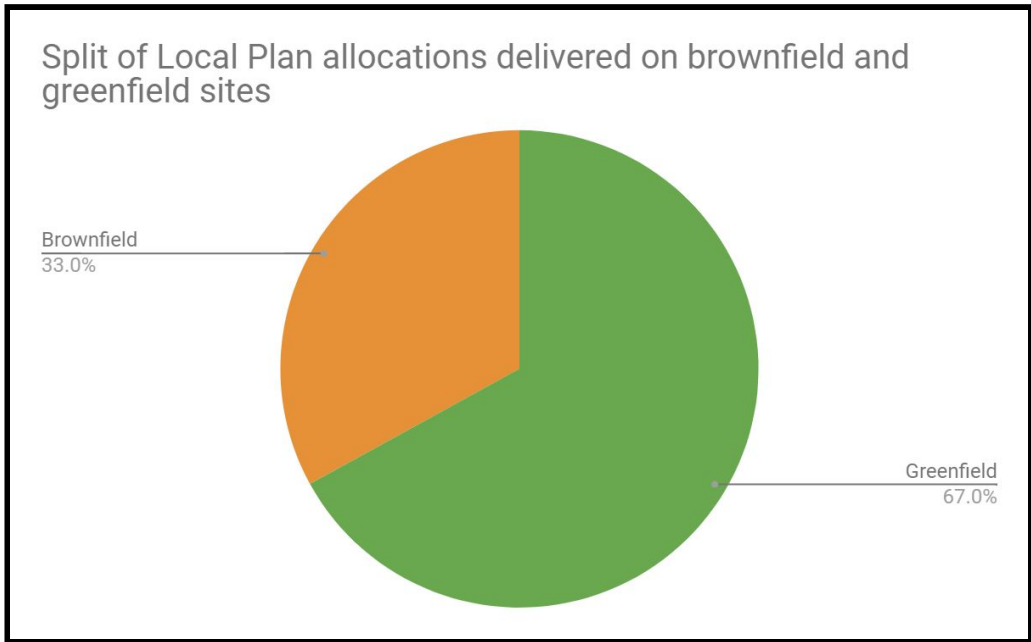
8.5. The Council is currently preparing the 2019/20 Housing Land Supply Statement and land supply calculation. The Council expects to continue to be able to demonstrate a land supply of over 5yrs.

8.6. Table 1 shows housing completions (net) again demonstrating delivery consistent with the Local Plan requirements and predicted supply.

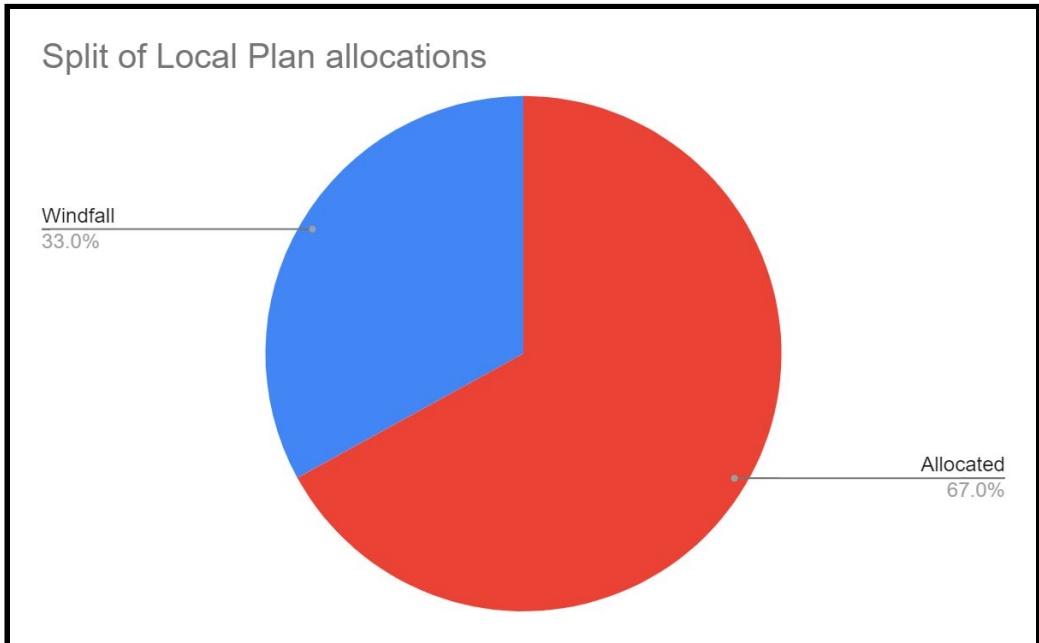
Table 1: All Housing Completions				
Monitoring Year	Dwelling Completions	C2 Student	C2 Care homes	Total
2011/12	624	15	16	655
2012/13	524	105	-32	597
2013/14	475	156	10	641
2014/15	285	237	32	555
2015/16	296	275	23	594
2016/17	417	40	-35	422
2017/18	446	679	-6	1119
2018/19	405	7	32	444
Total	3473	1514	40	5028

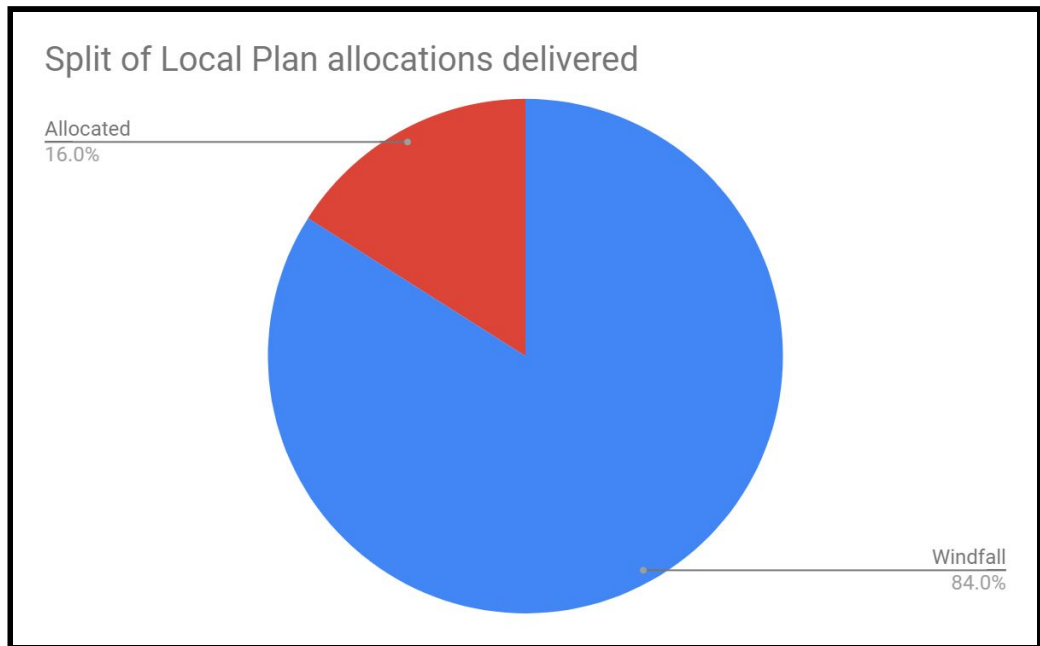
- 8.7. The Council has analysed whether a lack of consented supply is affecting delivery. The Council has granted planning permission for 5,666 dwellings in the last 3yrs (2016/17, 2017/18, 2018/19). The housing requirement, set out in the Local Plan, for the last years is 2,700 dwellings. The number of dwellings consented exceeds the housing requirement for the same time period by 2,966 dwellings. This confirms the Council's position that it continues to grant a sufficient supply of new homes.
- 8.8. The Council has reviewed the typologies of sites both allocated within the Local Plan and what has been delivered or is within the supply.
- 8.9. Evidence shows the split of greenfield and brownfield land has come forward as anticipated. The Council has been very successful in previous Local Plans in directing development to previously-developed land, achieving up to 80% development on brownfield land in the past. The Local Plan allocates land on both brownfield and greenfield; with approximately 30% of housing development on previously-developed land.





8.10. Analysis of typologies of sites being delivered has confirmed the root cause analysis already undertaken by the Council and further ratified by the Housing Delivery Group.





8.11. Development Management

8.12. Evidence gathering by analysing approval rates and determination periods of planning applications has informed the identification of root causes.

8.13. The Council has determined 6,413 applications since 2016/17 with 5,630 determined within the time limits. This shows a highly efficient development management service overall and that this has improved over the last four years, year on year. As previously stated, the Council has already implemented practices and procedures aimed at accelerating delivery and to guide the Strategic Sites through the planning consent process. This can be demonstrated by the improvement in determination within the national time limits, shown in the Table 2 below.

Table 2: Applications Data

HDT Year	Number of applications determined	Number of applications determined within the time limits	% applications determined within the time limits
2016/17	1711	1339	78%
2017/18	1704	1493	87%
2018/19	1471	1349	91%

2019/20	1527	1449	94%
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- 8.14. The Council has reviewed delivery of small sites; this shows determination periods as well as consent to completions are quick and consistent.
- 8.15. The Council has long been alive to delivery issues and worked constructively on delivering the Local Plan. Coupled with the emerging evidence on typologies of sites being delivered, this has led the Council to focus analysis on the timescales within the planning process on the Strategic Sites. Table 3 below sets out the determination times experienced by the Strategic Sites and Other Local Plan allocations in gaining initial consent, gaining reserved matters or 'follow up' consents for phases and the time between validation and now for the Strategic Sites under consideration.

Table 3: Determination Times

Time taken for decision making	Median Average Time (Months)
Determination times of all strategic sites initial consents	13.5 months
Determination times of all strategic sites follow up consents	9 months
Determination times of all strategic sites under consideration (validation to July 2020)	22 months
Determination times of Other LP Allocations	11 months

- 8.16. Why is this and what actions may be necessary? An average determination time of 13.5 months, when compared against the national studies and findings on national averages¹, is considered to be speedy. This timescale is also affected by two of the Strategic Sites which went to appeal and therefore took significantly longer than the rest. When these two sites are removed from the analysis an average time to determine is between 7-9 months.

¹ Start to Finish - Litchfields, Phasing Methodology - Section 4

- 8.17. By comparison the Litchfields study, which looked at a national sample of determination times for strategic planning applications, suggests a national average of 25-30 months for sites above 500 dwellings. The Council's Phasing Methodology includes a review of national studies and compares them to local evidence; this highlights a note of caution in using national averages as they can derive from significant variances in timescales which skew the resulting average.
- 8.18. Whilst the average determination time for sites is good we always strive to improve performance.
- 8.19. The determination times being experienced by Strategic Sites under consideration is also identified as a root cause.
- 8.20. The main factors which have affected the determination times are
- Legal challenges,
 - Length of time to prepare S106 agreements,
 - Changes in viability requiring additional evidence and independent review, and
 - Complex interlinkage with infrastructure projects such as roads and railway infrastructure.
- 8.21. Analysis of the post consent period between consent and construction, including discharging of conditions, non-material amendments or variations remains effective and effective with above average timescales. This was identified in the Phasing Methodology and continues to be the case. These delivery issues are specific and bespoke to Strategic Sites and therefore targeted site specific actions are the most effective approach.
- 8.22. The Council intends to review the timescales with Phasing methodology although it considers the lead-in times and build-out rates will remain broadly the same, above national averages and with actions to continue this.
- 8.23. Engagement with stakeholders, including the sessions with members of the Housing Delivery Group identified a number of key issues and actions. The Housing Delivery Group felt that development management performance is good quality and identified a need to ensure that adequate resources are maintained and protected so that the Council can continue to work positively and constructively with developers in order to secure delivery of sustainable growth and housing.
- 8.24. The Housing Delivery Group highly valued the Council's focus on dealing with conditions approvals and minor amendments in the post

consent period. They were clear that adequate resources for this stage of the planning process should be maintained.

8.25. There is currently a difficulty with the supply and availability of materials and therefore some greater flexibility is required in imposing and approving conditions in order to reduce post consent delays. In addition the Group was keen to see the tests for conditions imposed on planning permission being applied rigorous so as to avoid unnecessary or onerous conditions being imposed on planning permissions. This is something that the team have been focussing on over the past 6 months through internal training sessions and peer review of decisions.

8.26. Policy approaches and the Local Plan review

8.27. In 2019 the Council began its review of the Local Plan with the publication of the Statement of Community involvement and the Local Development Scheme.

8.28. Work on housing delivery has also begun with the launch of a Call for Sites submission in February 2020 - June 2020. The Call for Sites sought submissions for market housing, affordable housing, accommodation for students, housing for older people, disabled and specialist needs accommodation, self and custom-build housing and gypsy and traveller pitches and has sought to hear from a wide range of people and organisations, including landowners, developers, housebuilders, agents, residents, parish councils and community groups. The Call for Sites is a key step in enabling consistent housing delivery in the future as it begins to uncover potential sources of land available for future development.

8.29. In July 2020 the Council launched its public consultation on 'Our future district 2040' (Reg 18) seeking the views of anyone who is interested in the future of the district including people who live and work in the district, community groups and businesses. The consultation runs to 30th September 2020 and is the first step towards a new District Plan. The Issues consultation is an all inclusive process and aims to enable early and inclusive engagement with the community so that stakeholders are involved at very early stages in shaping the plan.

8.30. Root cause analysis has identified the principal reason why delivery has dipped below expected is due to the time slippage of the Strategic Sites to deliver a proportion of the land supply. The development

strategy within the Local Plan and the inclusion of the Strategic Sites demonstrates the commitment by the Council to enabling housing delivery and meeting the Government's aim to significantly boost housing supply. Many of the reasons for time slippage are now resolved and eight Strategic Sites have consent and either delivering or imminently about to. Strategic Sites will continue to play an important role in delivering the Districts housing with completions of new homes predicted to improve significantly over the next 5-10yrs.

- 8.31. Stakeholder engagement with the Housing Delivery Group and internal officers highlighted the experience of the Strategic Sites and the discussions on viability and linkages to significant infrastructure causing delays at application stage. This is a recurring message which the Council has been addressing via the project team approach and working closely with infrastructure providers. The Local Plan review will address this through the development of a plan wide viability evidence base. Future allocations or any future Local Plan will assess linkages to infrastructure including fundings and timings as well as linkages to the Infrastructure Delivery Plan.
- 8.32. Looking at issues related to land purchase and development costs, inputs and viability Root cause analysis, stakeholder engagement and reviewing delays to Strategic Sites progress has identified the following issues;
- Developers have previously been paying too much for land
 - Landowners 'hope value' expectations are high
 - A view by of some public is that developers maximum profits over the provision of community benefits and there is public resistance to flexibility on a proposal to improve viability such a renegotiation on affordable housing
 - There are challenges and limitations to gathering information - pre-app and viability evidence, transfer and land value paid all market sensitive.
- 8.33. To address this going forward the Council will be increasing transparency on the land values expected and assumptions on viability input. Work on this is already underway within the Call For Sites and CIL documentation which is publicly available.
- 8.34. In the longer term, the Local Plan review will involve development of an evidence base on viability of development in-line with the updated national guidance and the NPPF which will create transparency over what is expected in terms of obligations and development cost assumptions.
- 8.35. As previously stated the principal cause for HDT measurement is the slippages experienced on the Strategic Sites. The Council is keen to explore actions which would increase delivery by complementing the Strategic Sites. The Council has begun this process by launching a

Call For Sites seeking a wide range of land uses and residential types. The process aims to identify a wide range of proposals such as market housing, affordable housing, intermediate housing, rural exception schemes, self and custom build, student accommodation and older persons/intergenerational housing. The Call for Sites process will inform the production of a Strategic Land Availability Assessment setting out where the Council considers suitable, available, achievable and deliverable sites are located.

- 8.36. Since the adoption of the Local Plan in July 2017, updated national guidance on housing types has been produced e.g. around older persons housing and key worker/first homes.
- 8.37. The Local Plan review will respond to the guidance and the range of proposals coming forward which, it is anticipated, will result in a diversification in housing delivery in the future.
- 8.38. There have been changes in market demand for development types and land uses since the production of the adopted Local Plan. Uses such as employment and retail which have experienced reductions in market demand and are likely to be more acutely affected by the pandemic indicate a need to review the evidence base and re-examine allocations for non-residential land uses.

9. Direct delivery

- 9.1. The Council as a direct deliverer of housing and a landholder has a direct impact on housing delivery. The Council has also recently begun to deliver housing directly as well as in partnership with others. As the property programme develops effective working between internal departments will be key in order for us to maximise the opportunities for delivery.
- 9.2. The Council has progressed housing schemes at Kingsmead Field and the Riverside regeneration project. The Council is in the process of developing an Asset Management Plan to ensure a coordinated approach to the delivery programme. The Council will be reviewing its landholdings as a matter of best practice and this includes a review of small sites. The Council also has a cross party councillor housing working group and an internal officer group to discuss housing and delivery matters.

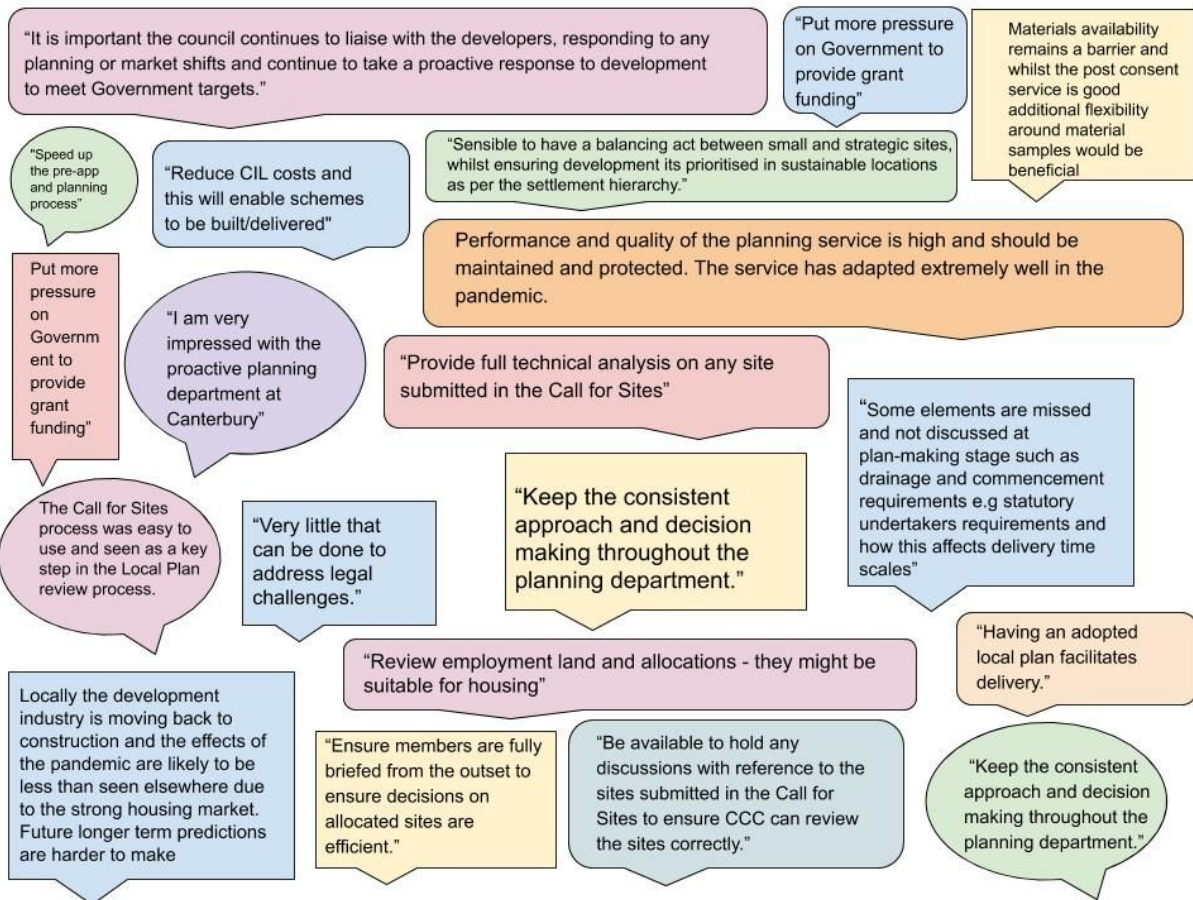
10. The Actions Table

- 10.1. The Actions needed to address the root causes and to improve delivery are set out in Appendix 3: The Actions Table.

- 10.2. The Actions Table (Appendix 3) includes monitoring arrangements, setting out how the actions will be implemented, monitored and managed including any necessary reporting arrangements. There will also be a review of the action plan in line with the annual publication of the HDT results.

Appendix 1: Stakeholder Engagement

As part of the investigation into the HDT result the Council has tested some of the emerging root cause analysis and potential actions with delivery stakeholders. This has been to ensure all issues have been captured by the Action Plan and that it contains impactful actions and solutions. Below are some of the key views and comments captured during that engagement.



Appendix 2: Housing Delivery Test Action Plan - Delivery Root Cause Analysis

Evidence or Process	Likely or known outcomes
<p>Typologies Data on the typologies of site allocated v's typologies of site delivered</p>	<ul style="list-style-type: none"> ● Allocated - The Local Plan shows 60% of sites in supply on strategic sites. ● Delivering - Strategic sites are not making up 60% of supply. ● Slower progress than predicted. ● Supply formed of a high % of windfall/other sites. ● 8 of the 12 Local Plan Strategic sites now have an initial consent.
<p>Small sites Analysing approval rates and determination periods of planning applications</p> <p>Analysing the post consent period between consent and construction</p>	<ul style="list-style-type: none"> ● Small sites - determination periods remain quick and consistent. ● Permission to completion - remain speedy and consistent.
<p>Strategic/Large sites Analysing approval rates and determination periods of planning applications</p>	<ul style="list-style-type: none"> ● Shows determination period is longer than anticipated. ● Slow burn sites delay in getting off the ground. ● JR/appeals and legal processes are the main root cause.

Analysing the post consent period between consent and construction	
<p>Conditions Reviewing the number and type of conditions and planning obligations on consented development.</p>	<ul style="list-style-type: none"> ● Number of conditions varies. ● Some consents have numerous pre-commencement or trigger point conditions.
<p>Current situation Completion data for plan period</p>	<ul style="list-style-type: none"> ● Completions for the last 3yrs (HDT period) are below Local Plan requirement of 900dpa. N.B HDT yrs 1 & 2 under transitional arrangements and therefore below 900dpa. ● Problems with data gather 2019/20 due to Covid-19 restrictions on site visits. ● Windfall/small site contribution has been steady and predictable. ● Shortfall created by longer than anticipated start to Strategic Sites.
<p>Housebuilders The types of developers and housebuilders delivering in the district.</p>	<ul style="list-style-type: none"> ● A range of national and regional housebuilders. ● Multiple sites progressed by the same builder. ● Some national/regional housebuilders are not in the district at all. ● Lack of significant and varied SME presence in the district
<p>Land costs and viability Looking at issues related to land purchase and development costs, inputs and viability.</p>	<ul style="list-style-type: none"> ● Potentially high land values negotiated. ● Landowners have potentially 'hope value' expectations high. ● Public view that developers prioritise profits over community benefits and infrastructure obligations. ● There are challenges and limitations to gathering information - pre-app and viability evidence, transfer and land value paid are all market sensitive
Stalled sites - Strategic Sites	<ul style="list-style-type: none"> ● Some haven't come forward

<p>Looking at allocated sites yet to be submitted or achieve a detailed consent and exploring the reasons why.</p>	<ul style="list-style-type: none"> • Direct meetings with developers is needed
<p>Stalled sites - small sites Reviewing sites with an extant planning permission which have not yet commenced and exploring the reasons why.</p>	<ul style="list-style-type: none"> • This is very small so a lapse rate review is not necessary at this point in time.
<p>Stakeholder and Developer engagement</p> <p>Housing Delivery Group (to date) Housing Delivery Group June 2020 sessions Phasing Methodology evidence Housing Monitor survey 2020</p>	<ul style="list-style-type: none"> • Delivery group outcomes - from the 2019 event and update remain exactly the same. • Long determination periods due to complex viability discussions and interlinked infrastructure projects. These complex matters are dealt with at application stage rather than during development of a Local Plan. • There are JR/legal risks associated with bringing sites forward. • Appeals - linked to length and complexity of determination periods.

Appendix 3: Housing Delivery Test Action Plan - Table of Actions

Action	Root Cause/Evidence	Timescales	Outcomes
Actions related to DM practices - Strategic Sites			
Encourage pre-app and seek involvement of policy team and external infrastructure (KCC) when necessary.	Data on the typologies of site allocated v's typologies of site delivered	Ongoing	<ul style="list-style-type: none"> Holistic approach to swiftly guiding development through the planning process and improve determination times. Risk of appeal and legal challenge minimised.
Work with legal to enable fast tracking of S106 agreements	Stakeholder engagement Analysing approval rates and determination periods of planning applications Analysing the post consent period between consent and construction	Short	<ul style="list-style-type: none"> Maintain collaborative working with KCC and improve S106 timescales.
Continue with project team approach to Strategic Sites and other major developments		Immediate	<ul style="list-style-type: none"> Holistic approach to swiftly guiding development through the planning process and improve determination times. Risk of appeal and legal challenge minimised.
Use the project team to facilitate site specific meetings aimed at targeting delivery issues by: <ul style="list-style-type: none"> Hold 1-2-1 meetings with developers of strategic sites. Identify the individual issues and actions needed. Early intervention with problems 	Looking at issues related to land purchase and development costs, inputs and viability.	Immediate	<ul style="list-style-type: none"> Holistic approach to swiftly guiding development through the planning process and improve determination times. Risk of appeal and legal challenge minimised. Identification of early stalled sites.
Review allocated sites yet to be submitted and hold meetings with the developer to explore why	Looking at allocated sites yet to be submitted or achieve a detailed consent and exploring the reasons why Stakeholder engagement	Short/Medium	<ul style="list-style-type: none"> Site specific solutions to stalled sites.
Seek to ensure quality of decision making and pre app advice remains high as well as retain experienced staff	Stakeholder engagement	Short	<ul style="list-style-type: none"> Maintain high quality decision making and thorough pre-application advice to enable holistic approach to swiftly guiding development through the planning process and improve determination times.
Maintain adequate resources for handling small sites	Stakeholder engagement	Ongoing	<ul style="list-style-type: none"> Maintain the high approval rate within time limits. Maintain the supply from small and windfall sites. Improve the planning process for SME and developers of small sites.
Actions related to DM practices - Post consent and Conditions			
Implement a review and reflect system to conditions prior to decision to	Reviewing the number and type	Short/Medium	<ul style="list-style-type: none"> Continue to experience shorter than average and smooth post

<p>minimise conditions. Review to consider</p> <ul style="list-style-type: none"> • Pre-commencement conditions • Conditions requiring studies or assessments which already form part of the application • Conditions requiring additional studies/strategies or management plans • Conditions requiring submission of samples 	of conditions and planning obligations on consented development.		consent period to accelerate build out.
Implement a flexible approach to approved materials, in appropriate cases - move to an agreed materials schedule system	Stakeholder engagement Analysing the post consent period between consent and construction	Short	<ul style="list-style-type: none"> • Continue to experience shorter than average and smooth post consent period to accelerate build out. • Improve the planning process for SME and developers of small sites.
Continue to focus resources on post consent stage via officer post and conditions tracker	Stakeholder engagement Analysing the post consent period between consent and construction	Ongoing	<ul style="list-style-type: none"> • Continue to experience shorter than average and smooth post consent period to accelerate build out.
Appointment of CIL officer in post to monitor and track applications through consent to construction timescales and early identification of stalling sites.	Analysing the post consent period between consent and construction	Immediate	<ul style="list-style-type: none"> • Improved monitoring of post consent timescales and early identification of stalled sites.
Actions related to Policy and Local Plan review - Delivery monitoring and Supply			
Review Council's Phasing Methodology to reflect any changes in lead in times or build out rates experienced.	Stakeholder engagement Analysing approval rates and determination periods of planning applications Analysing the post consent period between consent and construction	Short	<ul style="list-style-type: none"> • Update the Phasing Methodology to reflect latest evidence. • Ensure the ongoing robustness of the land supply assessment.
Produce the 2020 Housing Land Supply Statement and confirm the presence of a 5yr housing land supply	Ongoing practices Following national guidance	Immediate	<ul style="list-style-type: none"> • Continue to demonstrate a 5yr housing land supply.
Continued engagement on the completion monitoring and phasing of sites in the land supply	Ongoing practices Stakeholder engagement	Immediate	<ul style="list-style-type: none"> • Continue to demonstrate a 5yr housing land supply. • Ensure the ongoing robustness of the land supply assessment.
Continue Delivery Group to identify barriers and as a sounding board for issues and actions rolling throughout the year	Ongoing practices Stakeholder engagement	Ongoing	<ul style="list-style-type: none"> • Ensure the ongoing robustness of the land supply assessment. • Maintain collaborative working with the development industry and delivery stakeholders.
Actions related to Policy and Local Plan review - Typologies of Sites			
Diversify typologies and sizes of sites in the supply of allocations through	Diversify typologies and sizes of	Medium/Long	<ul style="list-style-type: none"> • Diversify typologies and sizes of sites through the LP review.

the LP review	sites through the LP review		
Identify CCC small sites and self build plots available through corporate programmes.	Diversify typologies and sizes of sites through the LP review	Medium	<ul style="list-style-type: none"> • Make the most effective use of the corporate land holdings.
Maintain and monitor supply of small and windfalls sites	Ongoing practices Stakeholder engagement	Ongoing	<ul style="list-style-type: none"> • Improve monitoring processes.
Encourage appropriate small sites identified in Call for Sites to come forward for development.	Diversify typologies and sizes of sites through the LP review	Short	<ul style="list-style-type: none"> • Improve SME presence in the district. • Increase Rural housing schemes and specialist developers.
Consider the role rural housing in diversifying the typologies of allocations plays in meeting needs and ensure the Local Plan meets the requirements for rural housing in the NPPF.	Diversify typologies and sizes of sites through the LP review	Medium/Long	<ul style="list-style-type: none"> • Improve SME presence in the district. • Increase Rural housing schemes and specialist developers.
Actively encourage developers and housebuilders not currently delivering in the district to engage with the Council to establish <ul style="list-style-type: none"> • Why are they currently developing here? • What can we do to enable them to? 	The types of developers and housebuilders delivering in the district.	Medium/Long	<ul style="list-style-type: none"> • Increase delivery from additional developers and housebuilders.
Use the existing agents forum to increase engagement with SME and identify specific SME barriers to resolve.	Diversify typologies and sizes of sites through the LP review Data on the typologies of site allocated	Short	<ul style="list-style-type: none"> • Improve SME presence in the district. • Increase rural housing schemes and specialist developers.
Improve transparency on land values expected and assumptions on viability and make them publicly available.	Looking at issues related to land purchase and development costs, inputs and viability.	Medium/Long	<ul style="list-style-type: none"> • LP viability work will create transparency over what is expected in terms of obligations and development cost assumptions. •
Local Plan review evidence base on viability of development in-line with the updated national guidance which will create transparency over what is expected in terms of obligations and development cost assumptions.	Looking at issues related to land purchase and development costs, inputs and viability.	Medium/Long	<ul style="list-style-type: none"> • LP viability work will create transparency over what is expected in terms of obligations and development cost assumptions.
Assess changes in market demand for employment land and review LP allocations for employment land including any outcome of employment land review	Ongoing practices Stakeholder engagement	Medium/Long	<ul style="list-style-type: none"> • Reflect limited market demand and make effective use of allocated sites.
Actions related to direct delivery by the Council			
Monitor and review the Housing Strategy and the Action Plan	Ongoing practices	Medium	<ul style="list-style-type: none"> • Maintain an up to date Housing Strategy.
Development of an asset management strategy for managing land holdings and disposal of land		Ongoing	<ul style="list-style-type: none"> • Make the most effective use of the corporate land holdings.
Maintain the Housing Working Group and continue to hold monthly meetings	Ongoing practices	Ongoing	<ul style="list-style-type: none"> • Maintain effective communication between internal departments focussed on delivery.
Maintain the Councillor Housing Working Group	Ongoing practices	Ongoing	<ul style="list-style-type: none"> • Maintain effective communication between internal departments and councillors focussed on delivery.

Continue with the small sites project to inform the future corporate building programme	Diversify typologies and sizes of sites through the LP review	Ongoing	<ul style="list-style-type: none"> • Make the most effective use of the corporate land holdings.
Continue with corporate building programme including Kingsmead Field, Parham Court. Future projects include Herne Bay Beach Street and Riverside Regeneration	Make the most effective use of the corporate land holdings.	Ongoing	<ul style="list-style-type: none"> • Make the most effective use of the corporate land holdings.
Ensure internal coordinated approach to facilitate a smooth planning decision making process such as undertaking internal pre-app processes	Ongoing practices	Medium/Long	<ul style="list-style-type: none"> • Maintain effective communication between internal departments focussed on delivery
Promote the key role planning plays in delivery and the resources it provides to other departments	Developer engagement	Medium/Long	<ul style="list-style-type: none"> • Maintain effective communication between internal departments focussed on delivery