

Sevenoaks District Council – Housing Delivery Test Action Plan

July 2021

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Executive Summary

- This action plan explores reasons for under delivery of housing in the District identified through the Housing Delivery Test (HDT) result for 2020. The result for Sevenoaks District is 70% which means an action plan must be produced, apply the presumption in favour of sustainable development and include a 20% buffer in the 5 year housing land supply requirement.
- It finds areas of improvement and aspects which are already working towards increasing delivery through root cause analysis of different aspects of the planning process.
- Actions in the Councils control are set out with an aim to improve delivery. Headline actions include; adoption of a new Local Plan, increased training and discussion around HDT, development of additional guidance & research and upkeep/improvement of existing processes & procedures.

Introduction

- 1.1 This action plan has been prepared to investigate the reasons for the delivery of sites for housing in Sevenoaks, measured by the Housing Delivery Test (HDT), and sets out measures to boost delivery in the District.
- 1.2 National policy reflects the Government's objective to significantly boost the supply and delivery of new homes. The National Planning Policy Framework (NPPF) (Feb 2019) sets out that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 1.3 Paragraph 75 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. Identify the current situation in terms of site delivery in the District
 2. Ascertain the consequences of not delivering enough housing sites
 3. Root cause analysis, looking at the factors that have the potential to affect delivery
 4. Set key actions and responses to the findings as measures to improve delivery in the District

Current Position

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

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

- 1.8 A one month reduction to the number of homes required for 2019/20 has been used to reflect disruption to housing delivery and monitoring caused by restrictions announced on 23 March 2020, in response to the COVID-19 pandemic. We had predicted a measurement of 68%, and therefore, the adjustment makes little impact on the final measurement and outcomes. Any HDT measurement from now on will not include the transitional arrangements but the number of homes required figure reduced by one month will remain for year 2019/20.
- 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: 2020 measurement published 19 January 2021.

	2017/18	2018/19	2019/20
Annual Core Strategy target	165	165	165
Number of Homes Required	503	708	647
Number of Homes Delivered	388	500	414

- 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 three year period. For this set of results the HDT is calculated using the transitional arrangements as set out in the Housing Delivery Test Measurement Rule Book. This means that the “minimum annual local housing need figure” is replaced by household projections for year 2017/18. The Standard Method housing requirement is used for year 2018/19 and 2019/20 as the adopted Local Plan is more than 5 years old.

Year	Number of homes required over previous 3 years	Number of homes delivered over past 3 years	HDT result
2018	1,205	1,130	94%
2019	1,712	1,212	71%
2020	1,858	1,302	70%

- 1.11 The HDT measurement result for Sevenoaks District Council is 70%, this means that 70% 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 73 of the NPPF.
- 1.12 The action plan set out below is considered proportionate to the level of delivery in the District. However, it should be noted that due to challenges presented by the Covid-19 pandemic it has been more difficult than usual to collate information for this action plan.

Significance of delivering housing in the District

- 1.13 Delivering sufficient housing in the District is important to meet the needs of its residents, this includes:
- Increased prospects of people being able to own their own home
 - Availability of suitable housing for an increasing ageing population
 - Avoid the out-migration of younger and economically active groups through delivery of suitable housing
 - Increase in adaptable housing stock to meet the changing needs of those who will live there
 - Availability of housing for local key workers
 - Increase in genuinely affordable homes

Root Cause Analysis

Constrained nature of the District

2.1 The “Planning for the right homes in the right places: consultation proposals” shows proportions of land in each local authority area constrained by Green Belt, National Park, AONB or an SSSI were published by MHCLG (September 2017). This data shows that Sevenoaks District is the tied top most constrained Local Authority with 94% of the District’s land being constrained, alongside Tandridge and Epping Forest. In the notes for this data it is stated this “...provides an indication of land that is not generally available for development, to illustrate the point in the consultation document that not all authorities will be able to meet their need in full within their own area”.

Neighbouring Authorities

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

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

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

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

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

Adopted Local Plan

Housing and Mixed-use Site Allocations

2.5 The ADMP allocates 16 residential sites and 5 mixed use sites, a total of 22 sites. Of these 22 sites 12 have received planning permission since its adoption in 2015 and 10 have been carried forward to the emerging Local Plan. Planning permission has been granted for the reserve land allocated in Edenbridge.

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

Site Ref	Address	Status
H1a	Car Park, Hitchen Hatch Lane	Completed Hotel on site
H1f	Greatness Mill, Mill Lane	Completed 26 dwellings
H1i	Land West of Cherry Avenue	Under construction for 56 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	Under construction 9 dwellings
H1o	Warren Court, Halstead	Permissioned for 29 dwellings
H1p	Land West of Enterprise Way, Edenbridge	Under construction for 196 dwellings
H2b	United House, Goldsel Road, Swanley	Under construction for 185 dwellings
H2c	Swanley Town Centre Regeneration Area	Permissioned for 303 dwellings
H2f	Powder Mills, Leigh	Completed 49 dwellings

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

Site Ref	Address	ADMP Phasing
H1b	Cramptons Road Water Works, Sevenoaks	Years 0-5 (2012-2016) (Application to demolish the old pumping station and offices has been approved)
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)
H1e	Johnsons, Oak Lane and Hopgarden Lane, Sevenoaks	Years 6-10 (2017-2021)
H1g	Bevan Place, Swanley	Years 6-10 (2017-2021)

		(proposals taken to innovations committee with planning application imminent) (The site is with the Council's ownership and plans to develop the site are progressing)
H1h	Bus Garage and Kingdom Hall, London Road, Swanley	Years 0-5 (2012-2016)
H1m	Currant Hill Allotments, Westerham	Years 10-15 (2022-2026)
H2a	Delivery and Post Office/BT Exchange, South Park, Sevenoaks	Years 10-15 (2022-2026)
H2d	Station Approach, Edenbridge	Years 0-5 (2012-2016)
H2e	New Ash Green Village Centre, New Ash Green	Years 10-15 (2022-2026)

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

The New Local Plan

2.9 At the time of publishing this document, the Council has been unsuccessful in judicial review proceedings against the decision of the appointed planning Inspector, concluding that the plan is 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). A subsequent appeal lodged by the Council against this outcome was not granted permission to proceed. Following this, the Council, has engaged with the Secretary of State to ensure a positive way forward, to adopt a Local Plan as soon as is reasonably practicable, which balances the need for housing and employment growth with the District's constraints such as Green Belt and AONBs. A meeting with MHCLG is planned to discuss moving forward with a local plan for the District.

2.10 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.

- 2.11 The Council is already engaged in work to produce a new local plan including updating and producing new evidence bases. Supporting evidence bases are currently being updated which address some key themes including: making the best and most efficient use of land, changes in work patterns and economic drivers and the future of town centres. The Council will continue production of a new local plan with updated local development schedule following meeting with MHCLG. Regular updates on the local plan are set out at the Development and Conservation Advisory Committee, the minutes of which are publically available on our website.

Five Year Housing Land Supply

- 2.12 Paragraphs 73-74 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 (2020) for Sevenoaks indicates that the District is currently delivering 70% of housing 'need', and therefore, as set out in paragraph 73c of the NPPF, the Council must apply a 20% buffer. In addition, as the Core Strategy (2011) policies are more than 5 years old, the Standard Method figure for housing need must be used in place of adopted housing requirement for calculating the five-year housing supply. Taking consideration of that set out above, the Council cannot currently demonstrate a five-year housing land supply. An updated 5 year housing land supply statement will be uploaded on the Council website shortly following publication of this action plan.

Brownfield Register and Permission in Principle

- 2.13 The Brownfield Register is available on the Council's website and is also in the form of an interactive map to aid the public and potential developers in viewing brownfield sites across the District. Currently, the sites in part 1 of the Brownfield Register either benefit from planning permission or are proposed for allocation in the 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. The Changes to the Current Planning System consultation by the government included proposals to include major development. The Council responded to this consultation but there has been no update from government on this aspect so far.
- 2.14 It is recognised that due to the delay in adopting a new Local Plan, brownfield sites in the Green Belt that are proposed for allocation in the new Local Plan are largely delayed. These sites will likely require status of a site allocation in order to gain planning

permission and reach their full potential to deliver housing that makes the most effective use of land.

- 2.15 The Brownfield Register has a number of sites within urban confines that are not subject to Green Belt policy. The August 2020 HDT action plan proposed that design guidance was provided for these sites to encourage them to come forward. With this aim in mind, the Council is already undertaking a district wide characterisation study which will provide guidance towards what might constitute appropriate design for different areas of the District. This evidence will provide additional information for any future design guidance including sites in the brownfield register. Therefore, specific site guidance is to be reconsidered following the outcome of this study.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 2.16 As part of preparations for the new Local Plan, a call for sites was open between 17 September 2015 and 31 October 2018 and received approximately 550 submissions of land for employment, housing and mixed use. These sites were assessed against the Councils agreed SHELAA methodology and form the most recent SHELAA document (December 2018) published on the Councils website.
- 2.17 Going forward the SHELAA will be hosted as an interactive map similar to the Brownfield Register. This will make the information more accessible and allow individuals and organisations to view sites in the context of the District. Plans are already in place to update the SHELAA and specific timings will be aligned with our local development scheme following planned meeting with MHCLG.

Size of Homes

- 2.18 The District has a high proportion of large homes with three, four and five bedrooms making up nearly 70% of the total housing stock. Evidence from our most recent SHMA shows that a shift is needed towards smaller dwellings relative to the distribution of existing housing. In particular there is a greater need for 3 bedroom market homes and 1 and 2 bedroom affordable homes. This is reflected in the Sevenoaks District Housing Strategy (2017). Research into housing density across the District in recent years shows that on average 60dph has been achieved on average compared to the Core Strategy target of 40dph. Therefore, it is envisaged that residential schemes coming forward will contain a greater number of smaller dwellings at a higher density, in line with the identified needs within the District, in place of schemes of unnecessarily large detached dwellings.

Determination of planning applications

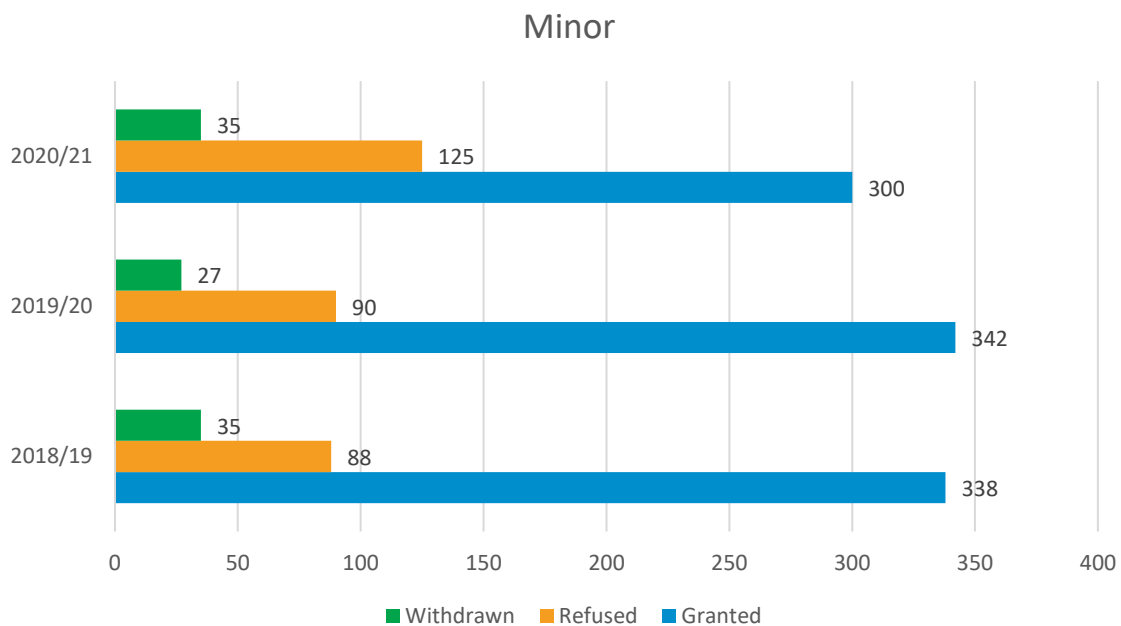
2.19 Sevenoaks is recognised as having one of the busiest planning departments in Kent. The table below sets out the Council's performance over the previous 3 years in relation to the number of planning applications determined within statutory time limits. The table shows that the Council has consistently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

	Majors	Minors
2018/19	85.71%	82.67%
2019/20	95.65%	76.83%
2020/21	88.89%	83.83%

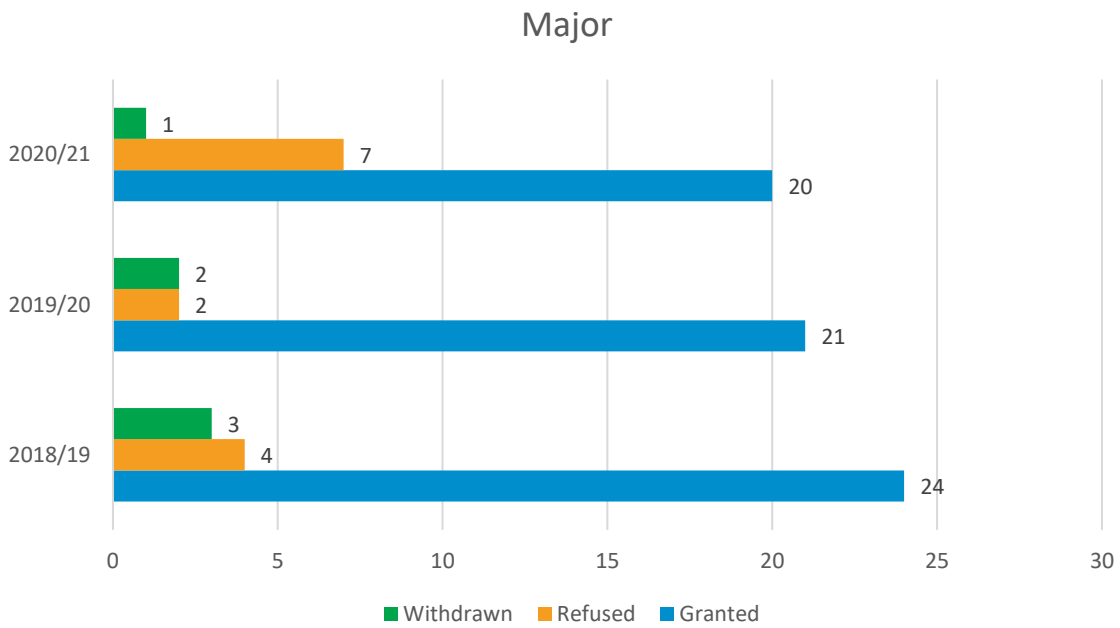
2.20 Therefore, in this respect the Council is working well towards increasing the delivery of suitable sites across the District. It is worth noting that despite impacts of Covid-19 the Council is consistently determining planning applications in a timely manner.

Proportion of planning applications approved

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



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

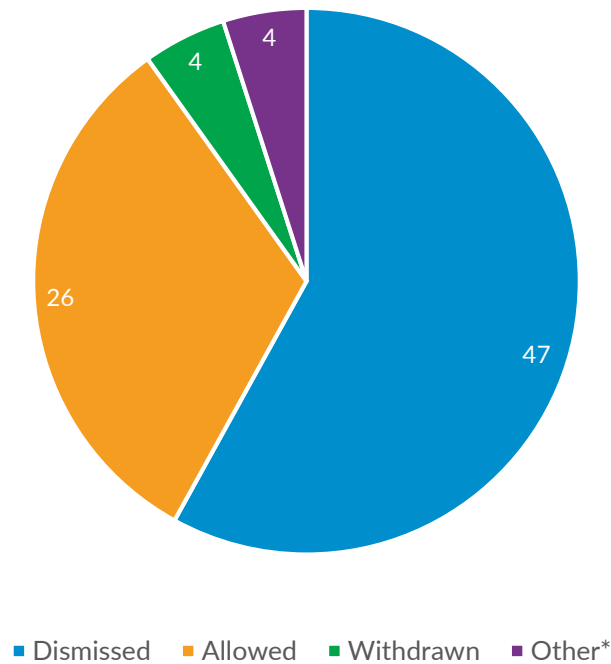


2.22 The majority of major and minor planning applications are granted planning permission. However, once planning permission is granted and conditions are discharged, the Council has little control over the build out of the approved dwellings. A process of contacting developers of larger sites is being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

Planning Appeals

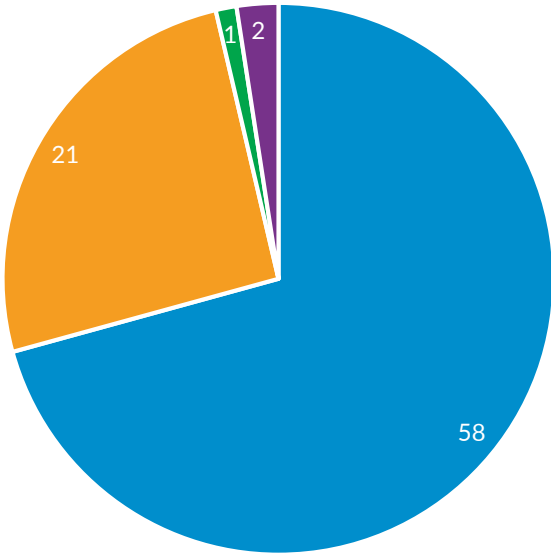
2.23 Overall, only a small proportion of planning applications go through to appeal every year. In each year most of these appeals are dismissed and a much smaller proportion of appeals are allowed. In the past year the total number of planning appeals has reduced by nearly 25% in comparison to the two previous years. The three pie charts below show the outcome of all appeals over the past three financial years.

2018/19 - Total Appeals = 81



**Other includes 4 turned away by PINS as invalid appeals*

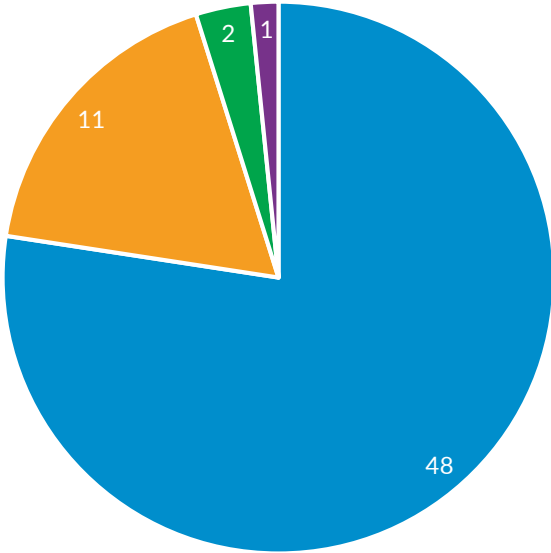
2019/20 - Total Appeals = 82



■ Dismissed ■ Allowed ■ Withdrawn ■ Other*

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

2020/21 - Total Appeals = 62



■ Dismissed ■ Allowed ■ Withdrawn ■ Split Decision

Planning Committee

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

	2018/19	2019/20	2020/21
Total number of applications that went to planning committee	31	35	49
Number of officer recommendations overturned	5	9	12

2.25 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

2.26 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.

2.27 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.

2.28 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

- 2.29 The Council are noted as impressive when it comes to CIL procedures and are included in the PAS pilot scheme for governance for developer contributions guidance notes. Going forward the Council is to be recognised as an example of good practice with particular note to our interactive map and transparent reporting. In addition, a recent review by Inner Circle scored the Council at the highest level when it came to assessment of the CIL process.
- 2.30 The Council does not currently have an instalments policy and therefore full payment is expected within 60 days of commencement of development. Whilst a small number of developers have asked whether we have an instalments policy, currently there has been no evidence submitted by them to show non-viability as a result of this approach to date. 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. Due to recent changes in Legislation, due to Covid 19, we will work with the current Government Guidance, which considers the impact of CIL on viability and allows small to medium firms to defer CIL payments. This provision is coming to an end shortly and we have only had one application for deferment, so it does not indicate that there is currently a need for an instalments or a deferral policy at the current time. However, it is considered that if the situation changes or the Governments changes are not sufficient, then an instalments policy is to be explored in the future to potentially ease financial burden on developers, particularly small and medium sized developers, due to the impacts of Covid-19.
- 2.31 A report was carried out for the Council (Local Plan and CIL Viability Study November 2018) this amongst other things considered the viability of CIL. The results of this report found that, the current level that CIL was charged at was still appropriate and therefore the current rate that CIL is charged at would not adversely impact on the viability of development. This still remains the case. It is considered that due to the changes proposed by the Government regarding introducing a single levy that we may reconsider the viability element at this stage when more information is provided as to how this is implemented.
- 2.32 The rate at which CIL is charged 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 receive. 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 and the amount we charge is regularly reviewed.

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

Housing Revenue Account, Joint Venture and Housing Company

- 2.35 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 9 affordable homes and are due to deliver 15 more since incorporation of the company in April 2018.
- 2.36 Quercus Housing and the Council's trading company Quercus 7 are both proactively looking to deliver sites for affordable housing to deliver affordable housing through joint ventures across the District.

Resourcing

- 2.37 It is an increasingly challenging environment to recruit and retain planners, in particular senior and principal planners. Sevenoaks District Council is a Platinum Award winning Investors in People employer since January 2016, the first council and public sector employer to be accredited with this award. The Council is proactive in its approach to recruiting for example, creation of specific recruitment video and supported internal movement. The Council also offers training opportunities, such as apprenticeships and university schemes.

Council owned land

2.38 The Council's adopted Housing Strategy (2017) sets out five priorities towards providing a good mix of decent and affordable housing across tenures including consideration of the Council's remaining surplus land for housing. The Council's Property team continue to consider whether there is any Council owned land that could be suitable for housing development in the future. Opportunities for Rural Exceptions sites are also put forward on Council Owned land in conjunction with the relevant Parish Council to deliver affordable local needs housing in the District.

Compulsory Purchase of sites

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

Developers and landowners forums

2.40 In previous years the Council has held an annual developers' forum. Currently, the Council meets with individual developers on a periodic basis and is considering new and innovative ways to re-introduce the developer's forum, to cover both planning policy and development management issues. Unfortunately, this work has been delayed due to issues around social distancing. 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.

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

Planning Performance Agreements (PPAs)

2.42 The Council currently has two PPAs in place with two large sites in the District where a planning application is expected to come forward following pre-application advice. The Council would consider the use of PPAs on other large sites which come forward, in particular those that are allocated in the new Local Plan.

2.43 It is envisaged that a procedure for using PPAs will be developed in order to make the process more accessible for larger sites and aid in the delivery of more homes in the District.

Covid-19

2.44 It is clear that the effects of Covid-19 will have 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 shares borders with Greater London and has good transport links with the city this is likely to have a significant impact, this is supported by anecdotal evidence from the local property market. Updated evidence bases will consider this aspect alongside changing work patterns in preparation of a new local plan.

Key Findings, Measures to Improve Delivery and Monitoring

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

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

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

4.3 Furthermore, the District is subject to areas and assets of particular importance including 93% Green Belt and 60% AONB as well as designated heritage assets, other heritage assets and areas of archaeological importance. Therefore, there are significant constraints which impact on the number of suitable sites for housing in the District. It is noted that adoption of a new local plan will significantly improve this situation.

Measures already in place

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

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

Monitoring

The following table sets out updates on the August 2020 Housing Delivery Test Action Plan measures:

Action	Update
Adoption of the new Local Plan	The local plan timetable is currently under review and will be published following meeting with Secretary of State.
Reintroduction of Developer Forums	This work has been put on hold and will be reconsidered following changing of work patterns after Covid-19.
Council owned companies to deliver sites and affordable housing	Quercus 7 and Quercus Housing are continuously considering available and suitable sites.
Incorporate housing delivery discussions in duty to co-operate meetings with neighbouring authorities	Housing delivery discussions are incorporated in all duty to co-operate meetings.
Review of conditions attached to planning permissions	Conditions attached to planning decisions are continuously being reviewed as necessary.
Follow up with landowners/developers/agents following grant of planning permission	This has been incorporated into new monitoring procedures to follow up with larger sites to understand any barriers to delivering on site and to assist where we can to overcome them.
Review sites on the Brownfield Register	The Brownfield Land Register is updated annually and intermittent updates are made if required.
Develop Design Guidance for sites on the Brownfield Register	Work has begun on this action with the production of a District wide characterisation study. The outcome of this will allow us to give design guidance to brownfield sites.
New call for sites, update SHELAA and produce interactive map	Work has begun on updating the SHELAA and a timescale will be established following an updated local development scheme.
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.
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	The CIL charging schedule continues to be considered as necessary.
Annual review of Section 106	Review of Section 106 continues on an annual basis.

Action Plan

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

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

following grant of planning permission			
Review sites on the Brownfield Register	Update and add sites. Consider moving sites onto Part 2	Planning Policy	Annually, December 2021
Develop Design Guidance for sites on the Brownfield Register	Assess appropriate sites for design guidance & publish on Council's website	Planning Policy, Conservation and Design	To be reviewed Spring/Summer 2022
New call for sites, update SHELAA 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.	Planning Policy, Development Management	Ongoing
Introduce PPA procedure	Develop and implement procedure for PPA's on strategic sites	Planning Policy, Development Management	Summer 2022
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
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4.5 Monitoring of this action plan will be ongoing by the relevant teams at the Council. The Council will continue to work with relevant stakeholders throughout the delivery of sites for housing in the District. This action plan will run until the next results of the Housing Delivery Test are published and will be updated as necessary to reflect future HDT result.

