

Tunbridge Wells Borough Council

Housing Delivery Test Action Plan 2019/20

September 2021



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1.0 Introduction

What is the Housing Delivery Test and Action Plan?

- 1.1 The Government has committed to the increased delivery of new homes nationally through committing to build an additional 300,000 new homes per annum by the mid-2020s. The latest figures on net additional dwellings in the UK has, since 2012/13 continued to increase year-on-year, with completions increasing from 222,280 in 2017/18, to 241,880 in 2018/19, to 243,770 in 2019/20 (see [Housing Supply: Net Additional Dwellings, England: 2019-20 \(MHCLG\)](#)). To facilitate this target of 300,000 per annum, the Government has introduced a number of new measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development (particularly within the past year due to the impact of Covid-19 on the construction industry). Local Planning Authorities (LPAs) are now challenged to be more proactive in increasing both the delivery and quantity of housing to meet the needs of their local area.
- 1.2 The Housing Delivery Test (HDT) has been introduced as a monitoring instrument to demonstrate whether LPAs are delivering sufficient homes to meet their housing need. The HDT, which was introduced in November 2018, compares the number of new homes delivered over the previous three years with the authority's housing requirement for those years. **Table 1** illustrates Tunbridge Wells Borough Council's (hereafter referred to as 'the Council') housing targets and where these have come from (an LPA's housing requirement is either the lower of the latest adopted housing requirement or the minimum annual local housing need figure based on the Standard Method; where the adopted housing requirement is more than five years old, the minimum annual housing need figure will apply). As per paragraph 73 of the National Planning Policy Framework (NPPF), the HDT will be used to determine the buffer that should be applied in local housing supply calculations and whether the presumption in favour of sustainable development should apply. The HDT dictates that:
- Where housing delivery over the previous three years has been less than 95% of the housing requirement, LPAs should prepare an action plan setting out the causes of under delivery and intended actions to increase delivery.
 - Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment.
 - Where delivery has been less than 75% of the housing requirement, the NPPF's presumption in favour of sustainable development will apply (a three-year transitional period operated from November 2018. In 2018 the threshold was delivery below 25% of the housing required over the previous three years, rising in November 2019 to 45% and then 75% in November 2020); and

- Where an Action Plan is required it should be prepared within six months of the test results being published (i.e., usually by the end of August of each year).

- 1.3 As above, an HDT Action Plan must be produced by an LPA where housing delivery is below 95% of their housing requirement. In addition, national guidance states that Action Plans can be produced as a matter of good practice or to identify processes to exceed housing requirements and support future housing delivery within an area.
- 1.4 The aim of the HDT Action Plan is threefold:
1. To identify the reasons for past under-delivery.
 2. To explore ways to reduce the risk of future under-delivery.
 3. Set out measures the LPA intends to take to improve levels of delivery.
- 1.5 It is anticipated that through addressing the three key aims above that an LPA can improve housing delivery rates and meet its requirement as set out in national policy and guidance.

Why Does the Council Have to Produce an Action Plan?

- 1.6 The HDT results for 2020 were published in January 2021 (see [Housing Delivery Test: 2020 Measurement](#)). **Tables 1 & 2** below detail the HDT requirements and performance for the Council. These results show that the Council delivered 86% against the requirement, which means that an Action Plan must be produced.

Table 1: Housing Delivery Test Targets (2020)

Year	HDT Target	Reason
2017/18	494	<p>The 2017/18 requirement of 494 is derived from calculating the average annual projected growth in households from 2017-2027 based on the 2014 household projections (the current methodology uses the 2014-based projections instead of the more recent 2016 or 2018 projections. The Government's reasoning for continuing to use these 2014 projections is to provide stability and certainty to the planning system in the short-term).</p> <p>Note: this figure of 494 differs from the Council's current Standard Method derived housing figure (which is used for the calculation of the Five-Year Housing Land Supply and Local Plan). This is because the Standard Method calculation uses a formula, with the household projections as a starting point, to identify the minimum number of homes expected to be planned</p>

Year	HDT Target	Reason
		for in a way which addresses historic under-supply via an affordability adjustment (capped). Details of the use of the Standard Method to calculate the minimum annual housing need figure are set out in the Housing and Economic Needs Assessment Planning Practice Guidance (PPG) , Paragraph ID 2a-004.
2018/19	688	The 2018/19 requirement is the first and only year of the HDT where it uses local housing need instead of annual average household growth. This requirement is based on the Standard Method which also uses the 2014-based household projections (from 2018 to 2028), an adjustment for affordability using the 2017 affordability ratio published 26 April 2018, and an appropriate cap based on the LPA's plan status at 01 April 2018. This cap equates to 40% above the LPA's annual average household growth. The Council's uncapped figure is above this 40% cap, meaning that the capped figure of 688 is used.
2019/20	624	Similarly to 2018/19, the housing target for the 2019/20 measurement is based on the local housing need determined by the Standard Method as at 01 April 2019. However, a reduction equivalent to 1 month on the target was applied to account for disruption to housing delivery and monitoring caused by Government restrictions announced on 23 March 2020 in response to the Covid-19 pandemic (see Housing Delivery Test: 2020 Measurement Technical Note). Without this 1-month discount, the housing target would have been 682.

Table 2: Housing Delivery Test Results 2020

Requirement				Delivered				HDT Measurement	HDT Consequence
17/18	18/19	19/20		17/18	18/19	19/20			
494	688	624	1,807	513	553	474	1,540	85%	Action Plan

- 1.7 The Council recognises that it did not deliver sufficient housing to meet its locally identified housing need during this period, although delivery has been significantly

higher than the annual requirement of 300 dwellings of the adopted Core Strategy (2010). The Council is responding to this challenge and has the ambition to increase both the quantum and the speed of new housing delivery within the borough. This Action Plan forms one of a suite of proposals (including a new Local Plan due to be submitted for examination in Autumn 2021) which aim to facilitate this.

2.0 Housing Delivery Analysis

- 2.1 The preparation of this Action Plan has been largely informed by the work that the Council has recently completed during its annual monitoring exercise of housing delivery and phasing. This work has been undertaken for a variety of reasons, including to affirm the Council's annual Five-Year Housing Land Supply position for 2020/2021. Annual monitoring has also informed the development of the housing trajectory in the emerging Local Plan (currently at Pre-Submission (Regulation 19) stage), which included the production of a Housing Delivery Phasing and Build-out Rate Methodology which can be found in the Council's latest [Housing Supply and Trajectory Topic Paper](#).

Tunbridge Wells Borough Geographical Context

- 2.2 The borough of Tunbridge Wells lies in the south west of Kent, bordering East Sussex. It covers an area of 326 square kilometres. The borough borders the authorities of Sevenoaks, Tonbridge & Malling, Maidstone, and Ashford in Kent, and Rother and Wealden in East Sussex. The borough is home to 5 key settlements, namely: Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook and Hawkhurst. In addition, there are a number of villages and hamlets located across the borough. **Figure 1** below displays the settlements within the borough and provides an overview of the relationship between them.

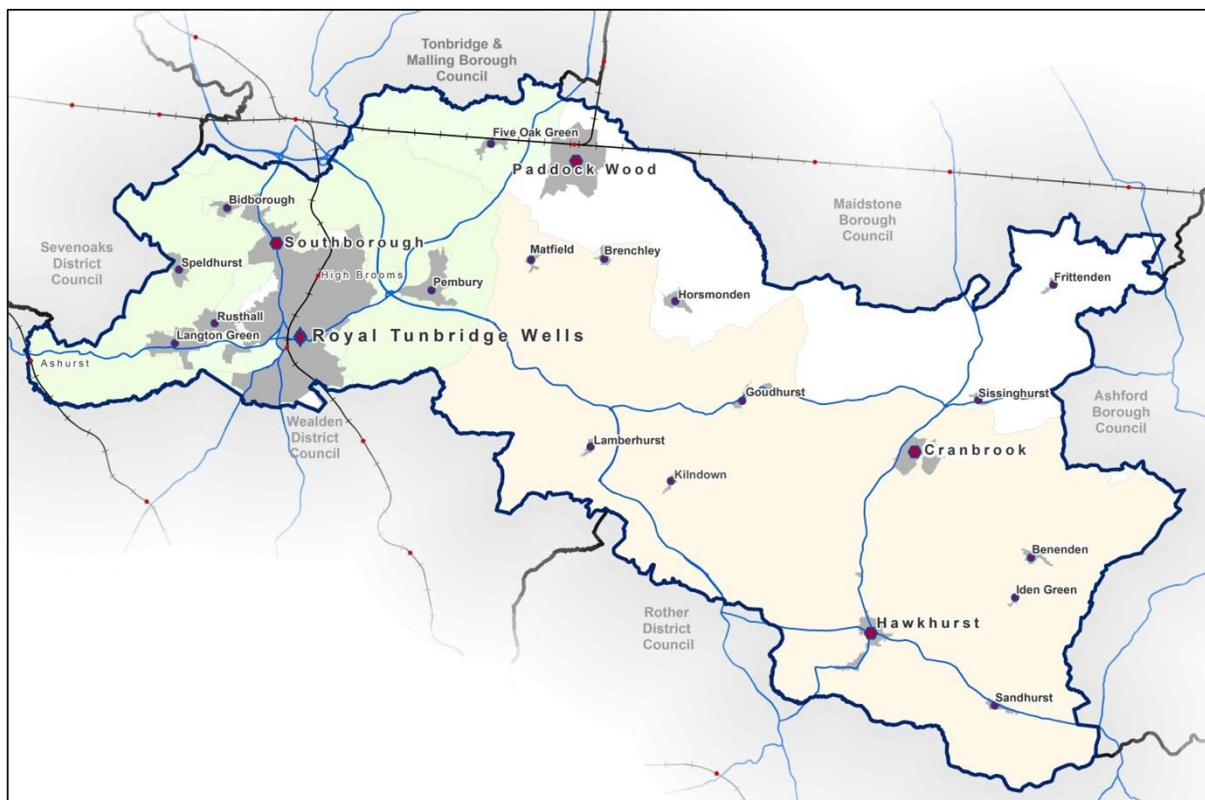


Figure 1: Borough Overview Map

Local Housing Market Context

- 2.3 Despite current economic uncertainties, the housing market within the borough has remained relatively stable in recent years with the average house price in Tunbridge Wells borough being £392,007 as at April 2020 (see [House Price Statistics \(Land Registry\)](#)). However, it has thus far become apparent that the Covid-19 pandemic and associated financial interventions – such as that around stamp duty - has caused a significant increase in average house prices in the local housing market, with the average house price increasing by around 6% in the year preceding April 2021. It is yet unclear whether the average house prices in the borough have peaked or will continue to rise further.
- 2.4 In addition, notwithstanding the pandemic's recent impact on house prices, drawing upon data prior to 2014, the Council's Strategic Housing Market Assessment (SHMA) showed that average house prices have been relatively similar to other surrounding areas close to London (see [Sevenoaks & Tunbridge Wells Strategic Housing Market Assessment 2015](#)). While house price increases between 2008 – 2013 had been modest, growth within the rental market had been above the rate of inflation (for example, Tunbridge Wells rental prices grew by 10% during September 2011 – September 2014, compared to the inflation rate of 6%).
- 2.5 Further evidence from the Council's SHMA, which was updated in 2017 (see [Tunbridge Wells Strategic Housing Market Assessment Update 2017](#)) indicated

notable affordability pressures for market house purchases, with 2013 lower-quartile (entry level) house prices 10 times earnings of households in the borough (comparing to a ratio of 6.5 nationally) increasing to 11.31 in 2015 (comparing to a ratio of 7 nationally). The most recent lower-quartile (entry) level data (for 2020; March 2021 release) indicates that the ratio in Tunbridge Wells borough has increased further to 12.80. In addition, the analysis contained within the SHMA suggests some real impacts arising from high housing costs. Over the 2001-11 period, home ownership fell (with increasing numbers of households renting privately). Levels of over-occupied households and those in shared housing increased, albeit at levels below the Kent and national averages.

- 2.6 The rising household numbers, coupled with an ageing population, mean that the Council will continue to need to provide a mix of housing types and sizes, including specialist forms of housing. This presents a challenge for the Council as it will need to facilitate the delivery of affordable housing and a range of housing types to meet identified needs, including those of older people, within both the market and affordable sectors.

Local Planning Context

- 2.7 The Council's most recently adopted development plan document (the [Site Allocations Local Plan](#) (adopted July 2016)) allocated sites across the borough based on the housing requirement of 300 dwellings per annum as set by the [Core Strategy](#) (adopted June 2010). Since then, there have been a number of new measures and reforms to the national planning system and policy, including the introduction of the Standard Method to set minimum local housing need. It should be noted, however, that the housing requirement increased to 648 in 2015/16 (as identified in the [SHMA \(2015\)](#)), before increasing to 694 in 2016/17 – 2017/18 based on the [SMHA Update \(2017\)](#).
- 2.8 The introduction of the Standard Method in July 2018 (based on the 2014 household projections), which involved an affordability adjustment, had further increased the Council's local housing need to 688 in 2018/19, before decreasing slightly to 682 in 2019/20. From 2020 onward, and as per the emerging Local Plan (which is based on an April 2020 base date), the Council will aim to meet the need of 678 dwellings per annum. As the Site Allocations Local Plan was prepared against the Core Strategy, the Site Allocations Local Plan does not allocate sufficient sites to meet this increased level of need. The identification and allocation of further sites is therefore necessary in order to meet the substantial increase of an additional 378 dwellings per annum.
- 2.9 Through the process by which the Council's new Local Plan is being produced, it is anticipated that sufficient sites will be identified to meet the new minimum housing need of 12,204 new dwellings over the Plan period (2020 – 2038). As detailed in Table 16 of the latest Housing Supply and Trajectory Topic Paper, through site allocations, extant planning permissions, and a windfall allowance, the Council expects to deliver approximately 13,257 dwellings against this need, thereby allowing a buffer of 8.6%.

- 2.10 Taking into account the expectation that the emerging Plan will be submitted in Autumn 2021 for examination, and given the latest results of the Housing Delivery Test, the Council therefore needs to take short-term action to boost housing delivery until the new Plan is adopted, especially as the Council is now partly through its emerging Plan's plan period. However, some sites, primarily smaller non-strategic sites, proposed for allocation in the emerging Plan have already started coming forward through planning applications, with early stage planning activity on others. It is likely that other sites being promoted through the emerging Local Plan will also come forward prior to adoption of the new Local Plan, primarily due to the early engagement activities having been, and currently being, undertaken by the Council.
- 2.11 In the long-term, while most of the strategic sites in the emerging Local Plan are under single ownership or under the control of individual developers, the Council will need to (continue to) work in partnership with landowners and developers to ensure that the delivery of these new homes promptly occurs once sites are allocated.

Housing Supply and Delivery

- 2.12 The following sections detail local evidence taken from the Council's own records on housing completions and extant planning permissions across the borough. These facts and figures are correct as of 31/04/2020. While the Council has obtained more up-to-date information through the 2020/2021 housing monitoring, the 2020 HDT (March 2021 release) assessed housing completions within the borough prior to 01/04/2020. As a result, primarily only evidence up to 31/03/2020 will be used within this section of the Action Plan and the results from monitoring in 2020/2021 will be used within next year's Action Plan, although regard will still be given to the most recent monitoring results from 2020/2021 as a measurement of success against actions set out in previous iterations of this Action Plan.
- 2.13 Historically, annual housing completions across the borough have been inconsistent; however, until the increase in local housing need from 2015/16 onward, the borough was on average meeting its housing requirement. **Figure 2** below displays net annual housing completions, housing requirements, and average completions across the period from 2000 to present.

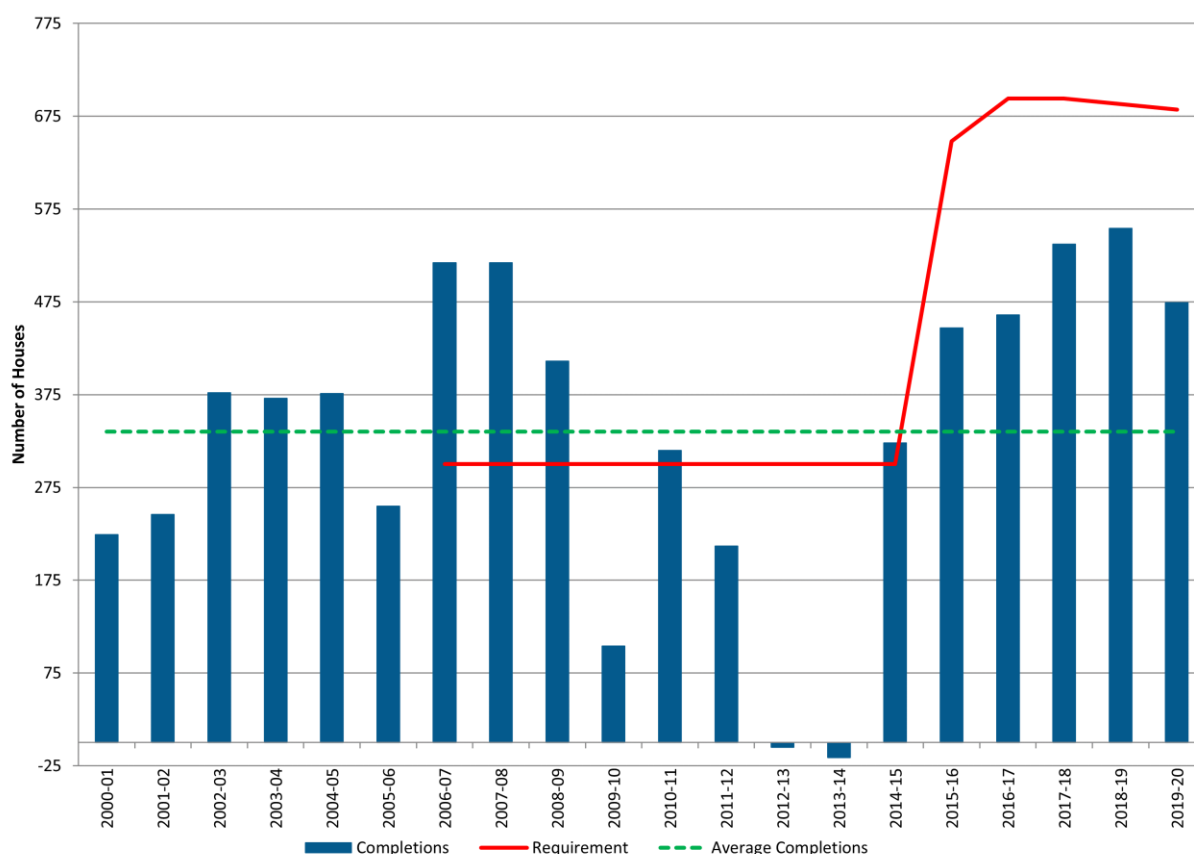


Figure 2: Annual Housing Completions Against Annual Housing Requirements

- 2.14 **Figure 2** shows that completions have been on average (335 dwellings per annum since 2000, or 347 dwellings per annum since 2006) greater than the housing requirement of the Core Strategy (300 dwellings per annum), and it is only since the increase in housing targets since 2015 that the borough has not met its targets. Despite this, the rate of delivery has generally increased since the housing targets were raised. This has largely been through an increase in dwellings committed to through planning permissions and allocations made through the Site Allocations Local Plan (2016).
- 2.15 Notably at no point within this 19-year period has the Council delivered 678 dwellings (with the highest delivery rate falling 124 dwellings short), suggesting that delivering this volume of housing will require a step change. That said, while there was a drop in delivery during the 2019/20 monitoring year (474 dwellings delivered, compared with 554 in the preceding year), it should be noted that the borough has seen a significant rise in housing completions during the most recent 2020/21 monitoring year (688), which is the highest annual delivery in the borough on record.
- 2.16 The general increase in recent housing delivery has partially occurred due to the significant increase in the number of new net dwellings approved over the last few years; however, further approvals and physical delivery of these dwellings (which the emerging Local Plan, supported by this Action Plan, aims to achieve) is required to meet the housing requirement.

2.17 **Figure 3** below shows annual housing completions and new planning permissions granted for housing.

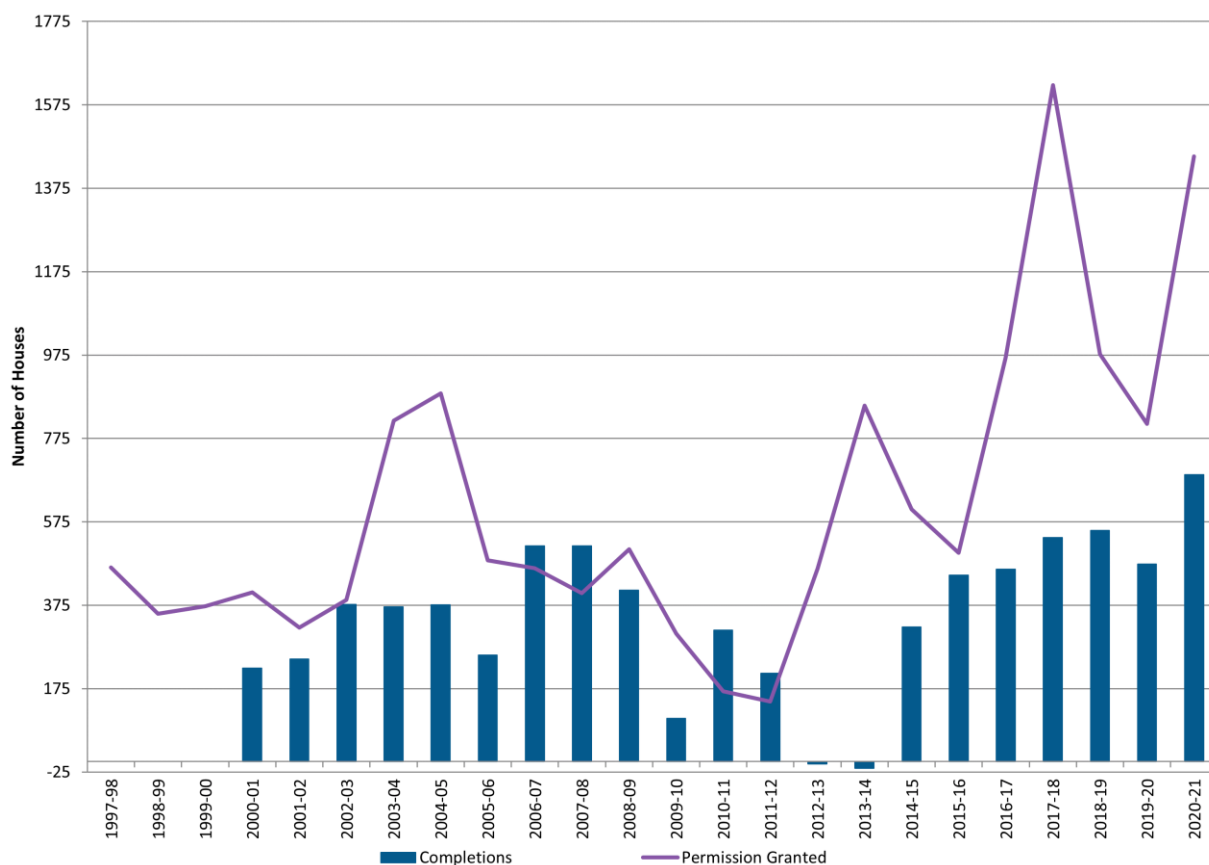


Figure 3: Annual Housing Completions and New Planning Permissions Granted for Housing

2.18 **Figure 3** shows that, since 2011/12, there has generally been a significant rise in the number of new dwellings committed through the granting of new planning permissions. The rise in planning applications granted permission will also require commitment from the development industry to deliver these new dwellings. The time taken for these dwellings to appear as physical completions (following the grant of planning permission) largely depends on the current build-out rates across the borough.

2.19 Using the historic completions data discussed above, it is possible to calculate the average length of time between planning permission being granted, completions starting on site, and completions finishing on site. To calculate these figures, a sample size of 1,090 planning applications across 11 years was used. To increase the statistical robustness of the dataset 42 outlying values were removed. This resulted in a final sample size of 1,048 planning applications across 11 years. **Figure 4** below displays information on the average amount of time (in years) between a planning permission (either Outline, Full or Hybrid) being granted and completions starting and finishing on site.

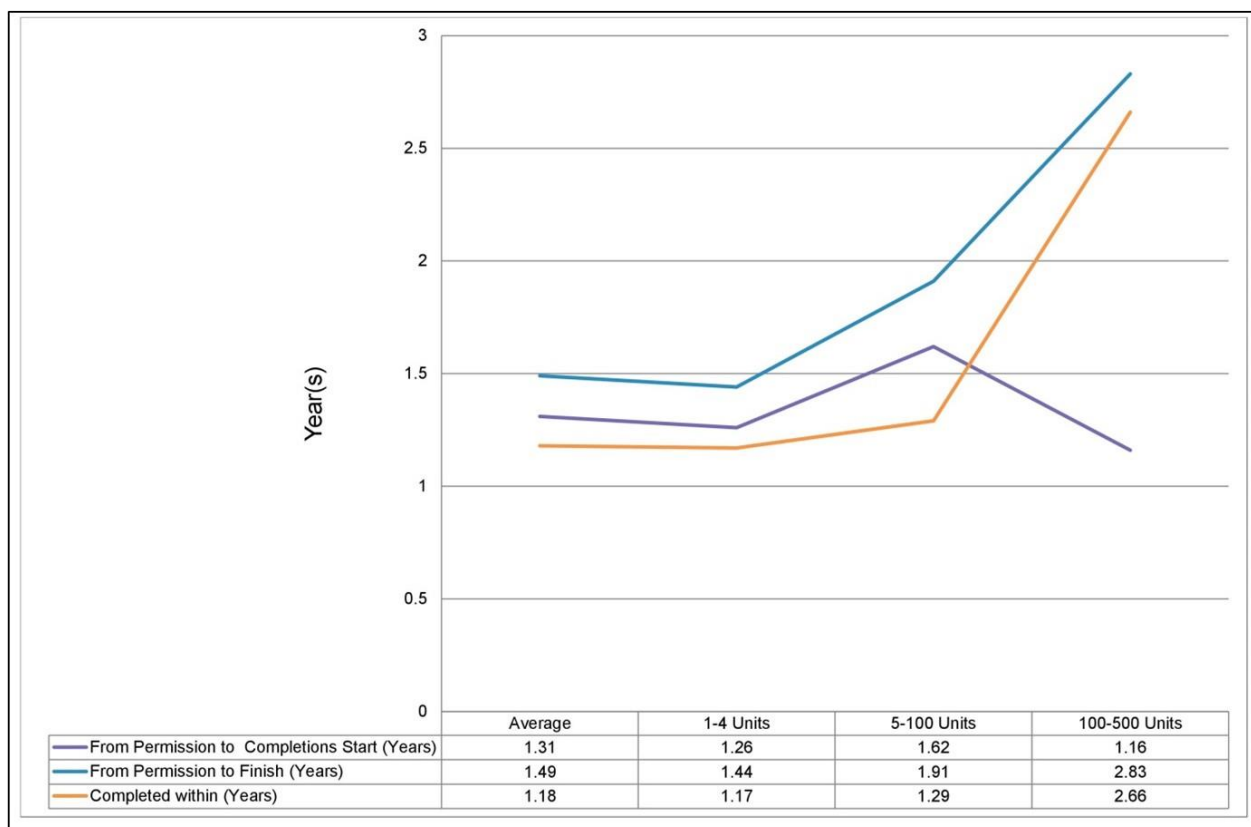


Figure 4: Average (Mean) Construction Rates Across the Borough

- 2.20 **Figure 4** displays some interesting trends in the time taken for construction across sites within the borough. The patterns are on the whole as national evidence would suggest, and the length of time taken for each stage increases as the size of the site gets larger. A notable anomaly is the length of time between permission being granted and the start of completions on site (the purple line in **Figure 4**) when sites of 5-100 dwellings are compared to sites of 100-500 dwellings, which indicates that the length of time spent at this stage appears to decrease once a site reaches a certain size. It is possible that by the time larger schemes are approved that developers have already invested significant resources into a site, have developed detailed construction designs further (including those to discharge conditions) and have entered into considerable dialogue with the Council. It is also plausible that developers/house builders involved in larger schemes have more resources and experience available to them and are therefore able to implement planning permissions swiftly.
- 2.21 Taking the above into consideration, **Figure 4**, as well as the Council's Housing Delivery Phasing and Build-out Rate Methodology, both suggest that planning permissions usually start to deliver from around year 2 following the decision date, and generally from around year 3 for larger sites. As such, a correlation can therefore be made between the highest-on-record number of dwellings granted through new planning permissions in 2017/18 and the highest-on-record number of new dwellings completed during 2020/2021.
- 2.22 The Council considers that, as an LPA, it promotes practices and procedures which help to facilitate shorter lead-in times. These measures include encouraging hybrid

applications, ensuring that there is consistency in the resource at the Council responsible for particular sites/developments, pro-actively engaging with consultees (responsible for advice on the discharging of planning conditions) and infrastructure providers, and ensuring there is clear and ongoing communication with developers. The pre-application process is well used by developers and seeks to resolve potential issues ahead of the submission of a planning application. For major developments in particular, this includes the LPA encouraging developers to engage with local residents, businesses and relevant organisations. The Council has also recently adjusted the way that it works with key consultees (including its housing department and Kent County Council) to speed up the receipt of consultation responses, and has employed two full time Section 106 and Conditions Officers to increase the rate of discharging conditions and make the process for the receipt and administration of section 106 contributions smoother, thereby enabling the necessary infrastructure to be provided in timely manner to better enable completions on site.

- 2.23 The findings above illustrate that lead-in times across the borough are not currently a cause for concern. However, while the most recent monitoring year (2020/21) saw the highest rate of delivery on record, including meeting the Standard Method need of 678 dwellings, the LPA is keen to continue supporting the development industry where possible to ensure that the rate of delivery across the borough continues to meet the current housing targets. Generally, the lead-in times illustrate that a few years may be required before an increase in permissions granted is reflected in an increased rate of housing delivery, and therefore there is also a need to continue to increase the numbers of units (on suitable sites, as part of suitable schemes) permitted so that a sufficient number of houses can consistently be delivered that meets the housing targets.

Housing Supply Breakdown

- 2.24 The following figures detail the breakdown of sites that had planning permission for new dwellings within the borough as at 01 April 2020. The analysis of these can provide a picture into the current housing supply of the borough.
- 2.25 **Figure 5** below details the construction status of sites across the borough. As noted, the evidence considered in this section is correct as of 01/04/2020 and includes 3,313 dwellings across 368 individual sites.

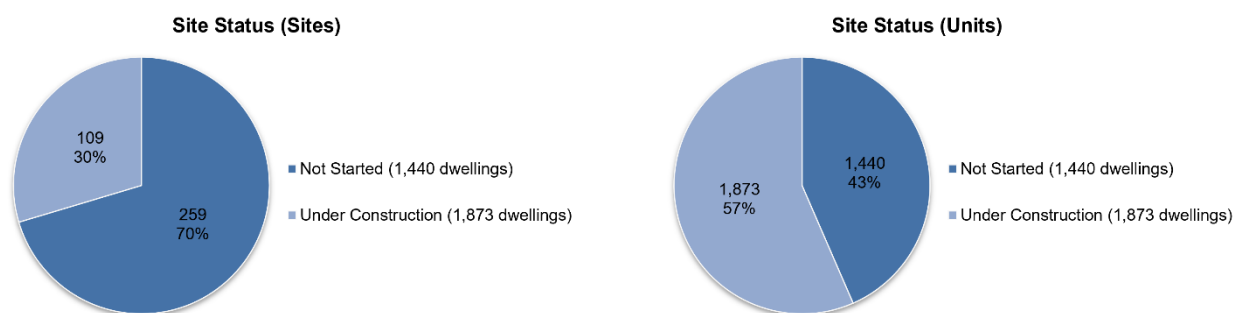


Figure 5: Construction Status of Sites Across the Borough as at 01 April 2020 (note: 1,873 dwellings are not under construction, but rather construction has started on sites that include a total of 1,873 extant dwellings)

2.26 **Figure 5** shows that there is currently a higher proportion of sites that have not started than those that are under construction. However, this proportional split between the sites is altered when considering the sites based on number of dwellings, with a higher number currently under construction. **Table 3** below provides further details on the breakdown of site status. This suggests that the sites which have not yet started are predominantly smaller sites.

Table 3: Site Status Breakdown as at 01 April 2020

Site Size	Not Started	Under Construction
Less than 5	203 (298 dwellings)	66 (95 dwellings)
5 to 99	53 (554 dwellings)	37 (716 dwellings)
100 to 500	3 (588 dwellings)	6 (1,062 dwellings)

2.27 **Table 3** illustrates that over half of the extant dwellings on sites which are currently under construction are found across six sites (of 100-500 units). It is evident from these figures that the careful management of sites of this size is required to ensure that housing delivery improves across the borough. The figures also show that small size sites (5 to 99 dwellings) form an important core of the housing supply with over a third (38%) of all extant dwellings falling within this category. Local and national evidence suggests that sites that fall within the small size category are likely to be delivered at a quicker rate than larger sites; therefore, the value in terms of contributing to the borough's housing supply should not be underestimated.

2.28 **Figure 6** below displays the Green Belt status of sites across the borough which at 01 April 2020 had planning permission.

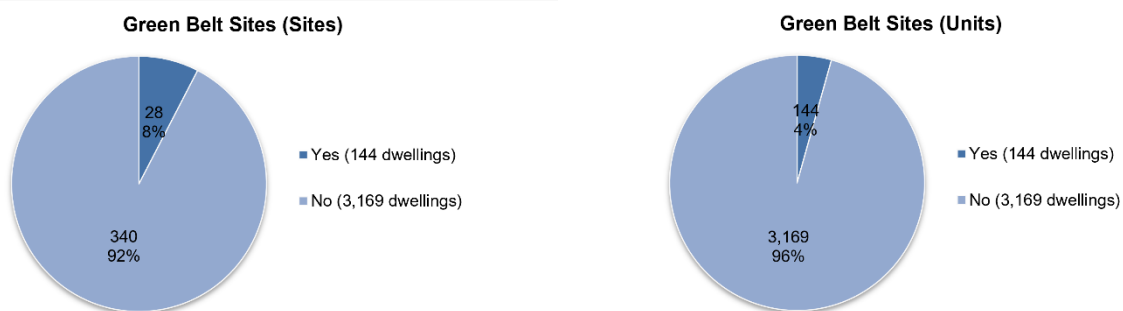


Figure 6: Extant Planning Permissions Within the Green Belt (as at 01 April 2020)

- 2.29 The NPPF attaches great importance to the Green Belt, stating that, once established, Green Belt boundaries should only be altered where exceptional circumstances are present, and inappropriate development in the Green Belt should only be granted where there are very special circumstances where any harm to openness (or other harm) is outweighed. **Figure 6** shows that there are relatively few new dwellings currently permitted within the Green Belt. Detailed analysis of the evidence indicates that those which have been permitted are primarily prior notifications and/or planning permissions for the conversion of agricultural barns/storage buildings to dwellings, conversion or intensification of existing dwellings, or the demolition of existing structures to be replaced with new dwellings. The Green Belt is located adjacent to urban areas making the fringes of it a potentially sustainable location for development and the Council has historically removed areas from the Green Belt to allow for strategic development within sustainable locations.
- 2.30 The Council will maintain its stance that only appropriate development within the Green Belt will be allowed, although it is noted that through the emerging Local Plan, subject to examination, the Council is proposing to remove areas from the Green Belt for strategic housing and/or employment allocations. The justifications and evidence base supporting proposed Green Belt release in the emerging Local Plan can be found through the Council's Pre-Submission Local Plan [supporting documents webpage](#).
- 2.31 **Figure 7** below displays the number of sites across the borough which at 01 April 2020 had planning permission within the High Weald Area of Outstanding Natural Beauty (AONB).

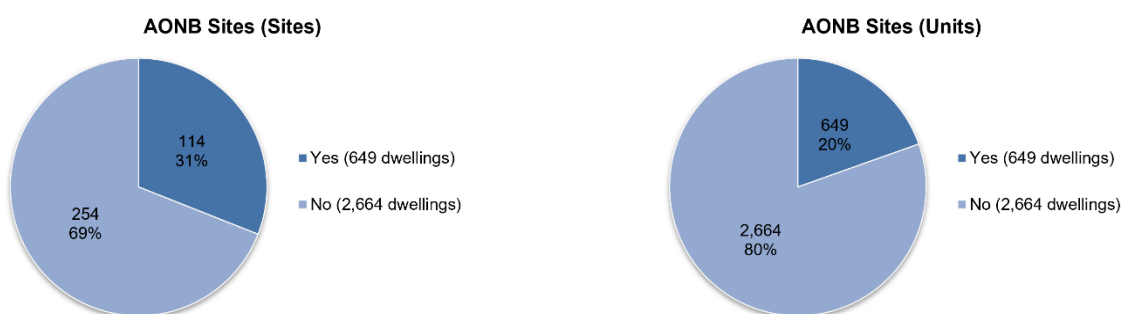


Figure 7: Extant Planning Permissions Within the AONB (as at 01 April 2020)

2.32 **Figure 7** shows that, despite 70% of the borough falling within the AONB, currently only 20% of extant dwellings fall within the AONB. The AONB is a material planning consideration within the NPPF which states that the scale and extent of development within these designated areas should be limited and that planning permission should be refused for major development other than in exceptional circumstances. It is noted, however, that in order for the Council to be able to meet its housing need in full, areas within the AONB (which have been subject to detailed assessment) have been proposed for allocation in the emerging Local Plan, albeit with proposals for major development within the AONB limited where possible. Likewise to proposed Green Belt releases, the justifications and evidence base supporting proposed development in the AONB in the emerging Local Plan can be found through the Council's Pre-Submission Local Plan [supporting documents webpage](#). In all cases, any planning proposals either on allocated sites or windfall developments should still fully consider their impact on the AONB and the AONB component parts.

2.33 **Figure 8** below details the number of extant sites and dwellings that are found on brownfield sites across the borough (at 01 April 2020). In the NPPF, brownfield sites are defined as ones which were, or are, occupied by a permanent structure, including the curtilage of developed land and any associated fixed surface infrastructure.

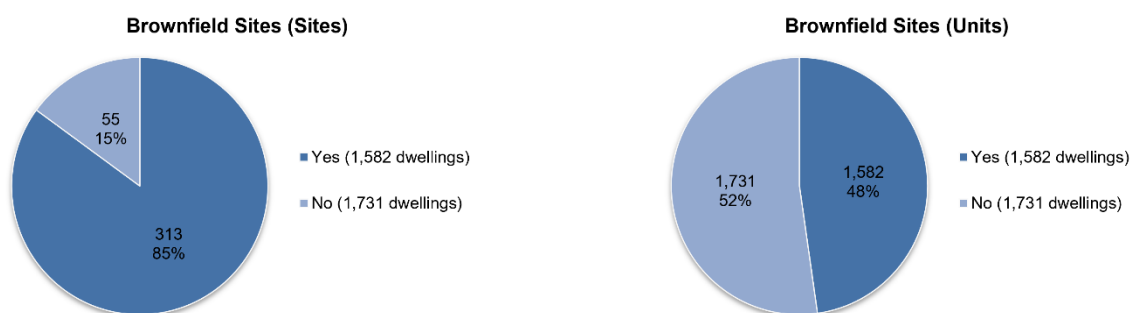


Figure 8: Extant Planning Permissions on Brownfield Sites (at 01 April 2020)

2.34 85% of all sites across the borough are on brownfield sites; however, this equates to only 48% of extant dwellings. Greenfield sites make up only 15% of the total number of sites but equate to 52% of extant dwellings. This is because, on the whole, development permitted on greenfield sites has generally been larger scale development primarily on allocated sites. The Council maintains a Brownfield Land Register but there have generally been very few submissions. In 2019/20, the majority of units, equating to 56% (down slightly from 64% in 2018/19), were completed on brownfield sites, while the remaining 44% were completed on greenfield sites. It is therefore evident that, while brownfield land within the borough currently contributes significantly to housing supply, it cannot be solely relied upon to increase housing delivery. This is evident from the lack of recent submissions to the Brownfield Land Register. It is acknowledged, however, that the majority of brownfield sites come forward through newly submitted planning applications, rather than first through the Register.

2.35 **Figure 9** below shows the number of extant sites that at 01 April 2020 had been approved through prior approval permissions.

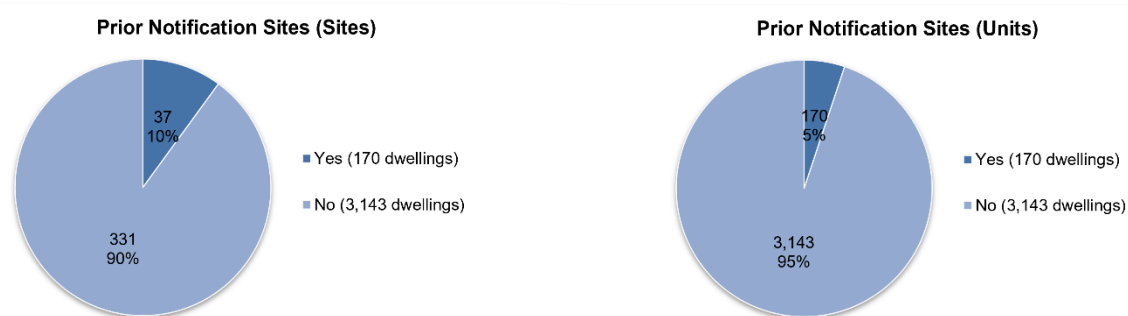


Figure 9: Extant Planning Permissions on Prior Approval Sites (at 01 April 2020)

2.36 **Figure 9** shows that consents granted through the prior approval procedure do not currently make up a large proportion of the extant housing supply within the borough. Historically, prior approval sites have contributed to the supply of housing through office/agricultural to residential conversions (41 units in 2019/20, 18 units in 2018/19, 82 units in 2017/18, 74 units in 2016/17, and 15 units in 2015/16). However, in 2018, the Council served 20 Article 4 directions on office premises across Royal Tunbridge Wells to ensure that any future proposals for conversion to residential at these sites would require planning permission via a full planning application, rather than via a prior approval. These have been continued through the service of Directions in 2021, with Directions also served on an additional two offices in the town centre. While the Article 4 directions served on offices within Royal Tunbridge Wells may reduce the number of office to residential conversions that come forward, it is likely that a modest supply of agricultural to residential prior approvals (and other forms of prior approvals) will come forward in the future, and as the figures presented above show, there are still 170 extant dwellings within the supply on prior approval sites. Article 4 Directions have also been served on a limited number of retail/café/restaurant premises in some villages in 2021 due to the impact of their loss on local communities, but these are not likely to significantly affect prior approval rates.

Issues Causing Current Delays On-Site (Covid-19)

2.37 On an annual basis, the Council contacts developers, agents, and/or applicants who have an extant permission to build new housing within the borough as part of the annual housing monitoring exercise. Site promoters are asked to provide comments on the status of their site, the expected phasing of delivery, and expected build-out rates of their development. This step is taken to ensure that accurate monitoring records can be used to inform the Five-Year Housing Land Supply calculations. The Council's latest Five-Year Housing Lands Supply Statement further details the robust methodology the Council uses when aiming to determine the latest status of sites in the borough (see [Monitoring Information](#)).

- 2.38 During the annual housing monitoring exercise that was undertaken during April-September 2020 for the monitoring year 01 April 2019 – 31 March 2020, it was clear that the Covid-19 pandemic had a significant (short-term) impact on the development industry. Through large-scale correspondence with all site promoters on extant planning permissions during this period, it was evident that, at the beginning of the Covid-19 Government-imposed lockdowns and associated restrictions, a large number of sites across the borough temporarily ceased operations which initially led either to a delay in the implementation of sites or a reduction in actual delivery rates on sites already under construction.
- 2.39 As mentioned previously, this impact on the development industry was taken into account in the 2019/2020 HDT target, whereby a discount of 1 month was applied, even though restrictions only came into effect in late March. It is unclear, through correspondence with MHCLG, whether further discounts will be applied to the 2020/2021 HDT target: it would be logical that they are given the first lockdown affected construction sites for several months within the first part of the 2020/2021 monitoring period. There has also been anecdotal correspondence that disruption to the supply chain and availability of materials and labour has also impacted construction.
- 2.40 Despite the above, it is known through correspondence with developers that some sites were able to continue and others to re-start fairly quickly, and as set out in para 2.3 above, that the housing market was strong. In combination this meant that the borough saw 688 net completions delivered during the April 2020 – March 2021 monitoring period. As previously mentioned, this is the highest rate of delivery in the borough on record. This has coincided with increased communication with site promoters (small and medium-sized housebuilders and national housebuilders) alongside the preparation of the emerging Local Plan as well as through the annual monitoring exercises. The Council aims to continue this frequent communication in order to gain a greater understanding of current market conditions in the borough, and more importantly whether there is scope/potential to speed up delivery on sites with extant planning permission and/or on allocated sites yet to benefit from planning permission as a means to ensure housing delivery meets the borough's local housing need.
- 2.41 The Council is also determined to continually support developers wherever possible in ensuring that consented sites are delivered. Indeed, throughout the pandemic, the Council has also maintained a fully-staffed development management department which has ensured that the Council has continued to offer a pre-application advice service to applicants and to continue to determine applications within short timescales to assist short-term delivery.
- 2.42 Moreover, the Council welcomed the government's decision to extend all Full and Listed Building planning consents which were due to expire between 23 March 2020 – 31 December 2020 to 01 May 2021 (see [Extension of Certain Planning Permissions: Guidance](#)) due to the Covid-19 restrictions and the impacts this has had on the development industry. It is considered that this has assisted site promoters by giving

them additional time to implement non-started schemes that were due to expire during this period but initially delayed due to the pandemic.

Potential Stalled Sites

- 2.43 **Table 4** sets out the criteria used to produce a “long list” of potentially stalled sites. This long list is then subject to detailed interrogation and further assessment of the latest progress, using information and knowledge of each site to determine whether a site is truly stalled (i.e., little prospect of development occurring on-site without more active intervention). As such, while some sites may meet the criteria below, they have been excluded from the list of stalled sites if, for example, a recent Submission of Details application has been submitted, and/or information has been received from the site promoter indicating the likely timescales for delivery and/or expected build-out rates, and/or initial groundworks have commenced without yet the delivery of units, among many other factors to be considered.
- 2.44 A commentary/update on those sites that were considered to be stalled in the last iteration of this Action Plan, and those that are considered to remain stalled, is provided beneath **Table 4**. As discussed, the Council considers that two of the three sites (the Former Gas Works site, and Triggs Farm) initially identified as stalled are now likely to be delivered within the next five-year period, with just one major site in the borough considered to remain stalled (the former ABC Cinema site). It should also be noted that, as above, while Covid-19 may have stalled some sites due to the pandemic’s impact on the development industry, this pause is considered to have only been temporary, particularly as earlier restrictions have now been lifted on the development industry and the subsequent significant increase in delivery across the borough over the 01 April 2020 – 31 March 2021 period.

Table 4: Criteria for Potentially Stalled Sites (for Initial Assessment)

Criteria No.	Criteria	Reason
1	The permission is for over nine units (i.e., is major development); AND	The majority (82%, 2,476 units) of total extant units (3,029) as at 01 April 2021 as per the Council’s latest Five-Year Housing Land Supply Statement are on sites of 10 units or over. Focus has therefore been given to sites of this size.
2	The permission was approved over 12 months ago (i.e. prior to 01 April 2020) and has not yet been implemented; OR	Site promoters require a reasonable amount of time to implement permissions (for example, to secure finance, have detailed construction drawings produced, gaining Building Regulations consent etc.), therefore it is not considered that

Criteria No.	Criteria	Reason
		applications approved within the last 12 months should be classified as stalled.
3	The site was implemented over 12 months ago (i.e. prior to 01 April 2020) but is yet to deliver any units; OR	If works on site have started but the site has not yet delivered any housing units then the cause should be investigated.
4	The site allocation has not progressed through the planning system. OR	If an allocation has not progressed through the planning system, then the cause needs to be investigated.
5	Recent communication with the applicant/developer or knowledge of the site has made it clear that the site has stalled.	If a site has evidently stalled through discussions with the site promoter or through knowledge of the site, then the cause needs to be investigated.

2.45 The following sites with extant planning permission were considered to be stalled during the last iteration of this Action Plan:

- Land at Triggs Farm Cranbrook Road Goudhurst Cranbrook Kent (17/02765/OUT) for 12 units (11 net). While this site was initially considered stalled, and there a reserved matters planning application is yet to be received, the Council contacted the planning agent during May 2021 and received a response indicating the expectation that all homes could be delivered in 2023/24. No issues were raised regarding the deliverability of the site. Furthermore, while representations made during the Council's Regulation 19 consultation on the Pre-Submission Local Plan sought to advance a case that the site could accommodate 20 homes, this does not challenge the potential for the site to deliver 11 homes as consented. Taken together, the Council considers there to be a clear intention from the landowner to bring the site forward for development, with the agent confirming the build-out rate. This is also a small scheme which could come forwards quickly. It is therefore considered that there is a realistic prospect that all homes will be built out within the next five-year period, and therefore is no longer considered to be a stalled site.
- Former ABC Cinema Site, Mount Pleasant Road, Royal Tunbridge Wells, Kent (19/01869/FULL) for 108 units. This site is considered to remain a stalled site. Since the last iteration of this Action Plan, however, the Council has taken a proactive approach in encouraging development on the site, including seeking advice from Homes England on best approaches that can be taken with regard to bringing forward the site, as well as maintained ongoing discussions with the landowner at corporate

and technical levels. While various initial groundworks and clearance works have recently occurred on site, there remains little evidence of imminent delivery and therefore the site is still considered to be stalled (hence has not been included in the latest five-year housing land supply statement 2020/2021). Despite this, the Council will continue to liaise with the developer of the site on how best to bring the consented scheme forward. An update on progress of this site will be provided in the next iteration of this Action Plan.

- 2.46 Additionally, the site known as the Former Gas Works, Sandhurst Road, Royal Tunbridge Wells was previously considered to be a stalled site. This is a site that was allocated under Policy AL/RTW10 in the Site Allocations Local Plan (2016) and is also proposed for allocation in the emerging Local Plan under policy AL/RTW 7. As written within the last iteration of this Action Plan, it was noted that the site does not have planning permission, and that there has been little planning activity on this site in recent years. However, the Council has increased communication with the site promoter and as a result of gained a greater understanding of progress made on site. It is noted that land contamination was previously a barrier to this site's delivery; however, the gas works were decommissioned a number of years ago with the site now lying largely vacant. The site has been cleared of all supporting equipment associated with its previous use and has been remediated from any land contamination.
- 2.47 Furthermore, on 28th May 2021, a demolition notice was served to the Council confirming that all services have been termination, a demolition and refurbishment asbestos survey has been undertaken with no Asbestos-containing materials identified and that demolition of the remaining structure on site down to ground slab level only is to commence. This demonstrates clear progress on the site.
- 2.48 In response to the Council's Pre-Submission Local Plan Consultation, a set of representations were submitted by the planning agent on behalf of Southern Gas Networks (SGN; current landowner) and J Murphy and Sons (JMS; a large international construction company). In supporting the proposed allocation, the representation made clear that the site was to be acquired and built out by JMS, explicitly stating:
- "It is anticipated that the acquisition of the site by JMS and SGN will be completed over summer 2021 with a planning application pursued shortly after. JMS hope to commence development in 2022".*
- 2.49 The Council has also separately sought clarification on the exchange and ascertained in May 2021 that the acquisition of the site by JMS from SGN is expected in October 2021. On the basis of this ongoing progress with the site with regards to site assessment work, site clearance, the sale of the site to a recognised construction firm who will build out the site, and clear timescales set out for the submission of an application, it can therefore be concluded that this site should no longer be considered a stalled site and is as such expected to start delivering within the next few years

(hence partly phased within year 5 (2025/26) of the latest five-year housing land supply statement 2020/2021).

Developer Consultation and Issues Identified (2019 Survey)

- 2.50 In addition to analysis of national and local evidence, in 2019 the Council had consulted with the development industry through asking local and national developers, housebuilders, and architects for feedback into a housing phasing and delivery document. Questions posed through the Council's "Developer & House Builder Questionnaire" included a list of assumptions about build-out rates, issues that impact planning application determination times, and housing phasing assumptions. Despite multiple attempts to consult with the development industry, only two responses to the Council's questionnaire were received (the response record from developers can be found in **Appendix A**, and the questions and responses received can be found in **Appendix B**).
- 2.51 **Table 5** below sets out key issues identified as affecting housing delivery within the borough. The variety of issues set out below make it clear that there is no definitive reason identified for not meeting the full delivery requirements at this time. It is likely that further work and engagement will assist in the further identification/refinement of issues that impact on housing delivery.

Table 5: Issues Affecting Housing Delivery (2019 Survey)

Issue No.	Description	Impact
1	A lack of site allocations to meet the new housing targets.	It is highly unlikely that the increased housing target will be fully met through windfall development alone, therefore additional major and strategic site allocations within the new Local Plan are required in order to meet the new housing targets.
2	Time taken to discharge conditions and determine planning applications.	Delays to both work starting on site and completions, thus impacting delivery rates.
3	High land values and difficulty obtaining land in the south-east of England.	Decreased profit, higher risk to developers, difficulty acquiring suitable sites all resulting in a slower delivery rate.
4	A delivery rate of 678 dwellings per annum has not been delivered at any point within the Council records.	As the higher housing target has not been met, this leaves questions over whether the development industry within the borough can

Issue No.	Description	Impact
		deliver houses at a rate to meet current targets.
5	In uncertain economic circumstances, difficulty in sourcing materials and/or labour for construction.	Inability to construct new dwellings through lack of materials/labour. The need to apply for variations in conditions/non-material amendments to reflect available building materials. A risk that developers may not be able to meet carefully designed schemes or design codes.
6	The borough is constrained in landscape terms; the AONB and other environmental factors are important features that must be taken into account when determining planning applications.	This results in longer determination periods as schemes have to be carefully designed, often resulting in smaller, more carefully designed schemes that take longer to deliver.
7	Delays associated with Section 106 Agreements.	Delays in planning application determination and start on site.

2.52 As previously mentioned, the factors above as well as those received and subsequently considered following the Regulation 18 consultation on the Draft Local Plan have fed into the Council's published Housing Delivery Phasing and Build-out Rate Methodology (which can be found in the Council's latest [Housing Supply and Trajectory Topic Paper](#)). This is the most up-to-date methodology which outlines and explains the key informed assumptions made on expected timescales for delivery for a range of sites of different sizes, as well as expected build-out rates.

3.0 Key Actions and Responses

- 3.1 Section 2 discussed historic housing delivery within the borough and identified the key causes of under-delivery within the borough (**Table 5**). This section identifies the actions that have already been taken and those that will be taken to increase housing delivery.
- 3.2 Guidance published by the [Planning Advisory Service](#) (PAS) details the actions that LPAs could take to boost the rate of housing delivery. The list of actions is not intended to be exhaustive but provides the Council with a starting point from which to build its Action Plan.

- 3.3 As discussed in Section 2 of this Action Plan, the Council is currently producing a new Local Plan. The processes and consultations that form part of the Local Plan have addressed many of PAS's suggested actions. Details of how the Council has addressed each of PAS's suggested actions, as well as further actions undertaken by the Council, to improve housing delivery across the borough are provided in **Table 6**.

Table 6: HDT Actions Addressed by the Council

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
PAS Suggested Action 1: Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development, including public sector land and brownfield land.	Y	Y	The Council has recently completed a Strategic Housing and Economic Land Availability Assessment (SHELAA) as part of its emerging Local Plan and has updated the document to inform the Regulation 19 Pre-Submission Local Plan. The SHELAA has identified a sufficient number of suitable sites to meet the borough's local housing need across the Plan period (2020-2038). If required at the Local Plan review stage, a further SHELAA will be undertaken to identify further land.	Throughout the new Local Plan plan period and future Local Plan reviews. (Longer-term - 18 months +)
PAS Suggested Action 2: Working with developers on the number of houses on site, including whether sites can be subdivided.	Y	Y	As part of the process of determining planning applications, meetings/discussions with developers are held to ensure that the potential of a site is unlocked while still ensuring that a scheme is sympathetic to local context. Planning Officers work with developers to ensure that new site allocations are programmed in realistically with the potential to bring forward or subdivide larger sites	The Council will continue to work with developers to ensure that the potential of a site is delivered. (Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			(including to facilitate multi-developer delivery) if appropriate.	
PAS Suggested Action 3: Offering more pre-application discussions to ensure issues are addressed early.	Y	Y	<p>Pre-application advice is currently promoted across the Planning Service. In addition, the Planning Policy and Strategic Sites & Delivery Teams have held confidential pre-application meetings with site promoters of site allocations and strategic sites proposed within the emerging Local Plan.</p> <p>Emerging Sustainable Design policy in the Local Plan proposes that <i>“applications that can demonstrate early, proactive, and effective engagement with the community will be looked on more favourably than those that cannot”</i>. This indicates the direction of travel. In the interim (i.e. ahead of the examination and adoption of the Plan) the Council will be increasing the extent to which all developers (including for minor proposals) are encouraged to engage early with the community. This should further resolve issues ahead of the submission of planning applications.</p>	<p>The Council will continue to promote its pre-application advice service.</p> <p>(Ongoing - longer-term; 18 months +)</p>

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			The masterplanning exercises which were held in 2020 and are being held in relation to the strategic sites (which are proposed for allocation in the emerging Local Plan) have and are hugely “frontloading” work on these sites, ensuring that key matters including the provision and funding of infrastructure are being addressed now, which will ultimately speed up the delivery of these sites (subject, of course, to the Local Plan’s examination).	
PAS Suggested Action 4: Using Planning Performance Agreements.	Y	Y	<p>Planning Performance Agreements will initially be sought by the Council on major development within the emerging Local Plan’s proposed Strategic Sites (land at Paddock Wood and east Capel, and Tudeley Village) and large and complex developments within Royal Tunbridge Wells of 100 dwellings/10,000 square metres floorspace or more.</p> <p>Since the last iteration of this Action Plan, the Council has created a new webpage on its website for Planning Performance Certificates (found here), which includes a Planning Performance</p>	<p>These will be sought from present going forward.</p> <p>(Ongoing - longer-term; 18 months +)</p>

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			Agreement Charter 2021 which all parties will be expected to adhere to. It has already signed a PPA in relation to part of one strategic site, which is progressing positively and again increasing the speed of pre-application discussions. Further PPAs are being prepared for other sites.	
PAS Suggested Action 5: Carrying out a new Call for Sites, as part of plan revision	Y	Y	Several Call for Sites exercises have been undertaken as part of the Local Plan preparation. Additionally, the Council has invited landowners identified through Land Registry searches to submit sites to be considered through the Local Plan.	Future Local Plan Reviews will consider if additional Call for Sites exercises are appropriate. (Longer-term; 18 months +)
PAS Suggested Action 6: Revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies.	Y	Y	To meet the high local housing need in the emerging Local Plan, new site allocation policies have been produced. Existing allocations (from the Site Allocations Local Plan (2016)) have also been reviewed to ascertain whether they are still deliverable. The emerging Local Plan has been produced as efficiently as possible to a high quality standard, based upon a robust and extensive evidence base.	Throughout the emerging Local Plan plan period and future Local Plan reviews (Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
PAS Suggested Action 7: Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use.	Y	Y	A number of Article 4 directions have been implemented to protect sites across the borough from inappropriate development. In 2018, the Council implemented 20 Immediate Article 4 directions on offices within Royal Tunbridge Wells (which removes permitted development rights). These were recently reviewed following evidence produced by Nexus Planning on Town Centre uses and need (see Tunbridge Wells Retail, Commercial Leisure and Town Centre Uses Study Update) which stated that the 20 existing Article 4 Directions were considered to remain suitable for continued protection. Given the changes to permitted development rights in April 2021, with the result that the 20 existing Article 4 Directions would cease to have effect on 31 July 2022, a further 20 non-Immediate Article 4 Directions were served on these properties to ensure that any proposal to change the use to residential would continue to require full planning permission, and be subject to assessment and consideration against	This will be continue to be a periodic review going forward. (Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			<p>relevant national and local planning policy.</p> <p>The Study undertaken by Nexus Planning also advised further Article 4 Directions on a number of buildings. Subsequently, the Council recently undertook a further assessment of existing office space and shops across the borough, and on 19 August 2021 served 11 additional Immediate Article 4 Directions.</p> <p>All served Article 4 Directions can be found on the Council's website (see Permitted Development).</p> <p>There are currently no plans to remove any of these Article 4 directions given the established loss of office space from the Town Centre (and the important employment and economic role which this plays) and the fact that an increased rate of housing delivery can be achieved through other means.</p>	
PAS Suggested Action 8: Engaging regularly with key stakeholders to obtain up-to-date information on build-out of current	Y	Y	Key stakeholders are contacted to provide phasing and build-out information for housing sites as part of the annual monitoring process.	Annually as part of the monitoring process.

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
sites, identify any barriers, and discuss how these can be addressed.			Additional questions on current/future barriers to delivery will be asked to give opportunity for further feedback from developers.	A developer's forum for Tunbridge Wells borough will be set up to provide future feedback on deliverability. Initial timetables for this have been delayed as a result of the Covid pandemic, but the forum will be instituted in late 2021/early 2022. Discussions will be held with neighbouring authorities who share a housing market area as to the potential for a joint forum. (Medium-term 6-18 months)
PAS Suggested Action 9: Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed.	N	N/A	The prioritisation of planning applications is not currently being considered as the Council are currently dealing with major applications efficiently and effectively. As above, the Council has also implemented the use of Planning Performance Agreements.	(Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
PAS Suggested Action 10: Ensuring evidence on a particular site is informed by an understanding of viability.	Y	Y	In the longer-term, the viability of future sites has been carefully considered through the production of site allocation policies in the emerging Local Plan. In the shorter-term (i.e. prior to the adoption of the emerging Local Plan, or for sites pursued outside of the Local Plan), sites will be assessed as per appropriate viability policies within the Local Plan.	Throughout the emerging Local Plan period and future Local Plan reviews. (Ongoing - longer-term; 18 months +)
PAS Suggested Action 11: Considering compulsory purchase powers to unlock suitable housing sites	Y	Y	The Council will consider the use of CPO powers if deemed appropriate in unlocking major and strategic sites identified in the Local Plan. The Council has also communicated this at relevant points to site promoters to assist in negotiations where relevant. In addition, Policy STR 4 (Ensuring Comprehensive Development) of the emerging Local Plan states that <i>“where necessary to achieve the Local Plan’s strategic objectives and development strategy, the Council will use its Compulsory Purchase Order powers (and/or work with other authorities to use their Compulsory Purchase Order powers) to</i>	Throughout the new Local Plan period and future Local Plan reviews. (Longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			<i>bring forward development in a timely and comprehensive way".</i>	
PAS Suggested Action 12: Using Brownfield Registers to grant permission in principle to previously developed land.	N	N/A	The Brownfield Land Register has not identified a surplus of brownfield land within the borough (and many sites identified already have planning permission); therefore, it would not be appropriate to pursue this action. However, further work has been undertaken alongside the production of the Pre-Submission Local Plan on the potential for allocations/windfall development on brownfield sites, and has included the production of a Brownfield and Urban Land Topic Paper .	The Brownfield Land Register is reviewed and updated annually; if action 12 becomes appropriate, then updates will be made to future iterations of this Action Plan.
PAS Suggested Action 13: Encouraging the development of small sites and higher site densities.	Y	Y	Site allocations and policies proposed in the emerging Local Plan encourage a mix of site sizes and site densities (as informed by consultation with local parishes and will be appropriate to the local setting).	Throughout the emerging Local Plan plan period and future Local Plan reviews. (Medium to Longer-term; 6-18 months to 18 months +)
Other Actions Taken by the Council				

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
(Additional Actions will be Identified as Appropriate)				
<i>Establish a Strategic Sites and Delivery Team</i>		Y	The Council has recently formed a Strategic Sites and Delivery Team, including a Strategic Sites and Delivery Team Leader, a Principal Planning Officer and two Senior Planning Officers, to co-ordinate the delivery of larger scale strategic sites within the borough as proposed within the emerging Local Plan. The aim of this team is to ensure that sites timely deliver both the appropriate number of houses and the appropriate infrastructure required.	Throughout the new Local Plan period and future Local Plan reviews. (Ongoing - longer-term; 18 months +)
<i>Work with statutory and internal consultees to increase speed of responses to planning applications, including funding additional resource for Kent County Council Highways</i>		Y	The Council has worked with various statutory and internal consultees to identify means by which consultation responses can be provided with greater speed and clarity, thereby reducing the length of time for planning applications to be determined, and ultimately speeding up delivery. As part of this, the Council has part funded a Principal Highways Planner at Kent County Council, meaning that there is additional resource available to focus on major	(Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			housing proposals, both at planning application and pre-application stage.	
<i>Section 106 Agreement Training, and outsourcing where necessary</i>		Y	<p>Key employees within Planning Services have undergone Section 106 Agreement training. The Council's Planning Services has also liaised with the Council's legal arm to establish that, in certain instances, work on S.106 agreement has been and will be outsourced to ensure that there are no delays to the production, signing and engrossment of S.106 legal agreements.</p> <p>A Section 106 template is also being produced, which will be placed on the Council's website.</p> <p>The Council during 2020 has also employed two S.106 and Conditions Officers. This is a dedicated resource set up with the specific aim of speeding up the consideration and determination of conditions attached to grants of planning permission for major development, including residential, and to reduce the time that Principal</p>	<p>Initial training undertaken and will be ongoing.</p> <p>Specialist guidance being developed.</p> <p>(Medium-term; 6-18 months)</p>

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			Planning Officers spend on requests for information regarding S.106s, so that they can better focus on the determination of planning applications.	
<i>Review of monitoring procedures</i>		Y	Ahead of the annual monitoring exercise, officers will continue to further review the monitoring procedures undertaken to ensure that the monitoring is carried out in the most efficient and effective way possible to speed up the process.	(Ongoing - longer-term; 18 months +)
<i>Review of Development Management Policies</i>		Y	As part of the preparation of the emerging Local Plan, Development Management Policies have been reviewed with the assistance of the Development Management Team. Policies have been carefully written to ensure that new policies work for both the Council and the development industry within the borough. The policies have also been further reviewed/refined following the representations received from the Regulation 18 Draft Local Plan consultation.	Upon adoption of the Local Plan, new Policies will come into force. (Medium-term; 6–18 months)
<i>Actively engage with Homes England</i>		Y	A list of the stalled sites was provided to Homes England in November 2020 alongside a meeting/discussion to	(Ongoing - longer-term; 18 months +)

Action	Appropriate	Actioned	How is the Council Addressing This Action?	Timescales
			<p>understand and action how Homes England and the Council, either together or separately, could intervene to bring about delivery of these sites. While Homes England carefully reviewed each site and ultimately confirmed they were unable to offer intervention, the discussions were particularly useful in ascertaining the existing issues and reasons for these sites to have stalled, and the best ways for the Council to further investigate and monitor these issues going forward, namely through increased correspondence with the site promoters.</p>	

4.0 Action Plan Monitoring Arrangements

- 4.1 The impact of the HDT Action Plan will be monitored annually; monitoring the success of the Plan will largely be based on the outcome of the HDT Results which are published annually in November. The HDT assesses housing delivery over the preceding three years so it may take up to three years for the impact of this year's Action Plan to be fully realised in the HDT results. As a matter of good practice, it is envisaged that the Council will update its HDT Action Plan on an annual basis. It is likely that this update will coincide with the annual housing monitoring carried out. **Table 7** details how the Action Plan will be monitored.

Table 7: HDT Action Plan Monitoring Timeline

Year	Month	Action
2021	Monthly (Jan-Dec)	Collation of planning applications approved for housing in the previous month
	January	2020 HDT results published
	February-August	Review of 2019 HDT Action Plan, including: <ul style="list-style-type: none"> Review of local and national evidence Comparison of 2018, 2019 and 2020 HDT Results
	April-July	<ul style="list-style-type: none"> Annual housing monitoring and publication of Five-Year Housing Land Supply Statement
	September	Publication of Action Plan
	September	Housing Return to Central Government
2022	Monthly (Jan-Dec)	Collation of planning applications approved for housing in the previous month
	January	2021 HDT results published
	February-August	Review of 2020 HDT Action Plan, including: <ul style="list-style-type: none"> Review of local and national evidence Comparison of 2019, 2020 and 2021 HDT Results
	April-July	Annual housing monitoring and publication of Five-Year Housing Land Supply Statement
	August	Publication of Action Plan
	September	Housing Return to Central Government

5.0 Conclusion

- 5.1 The Council recognises that delivering the increased local housing need, as per the Standard Method, will be a challenge given the difference to the previous Core Strategy (2010) requirement (678dpa rather than 300dpa). However, as mentioned previously, the borough saw the highest rate of delivery on record within the last

monitoring year (688 net completions), which indicates that actions undertaken by the Council to-date, such as increased frequent communication with site promoters, have had a positive impact. While most of the actions identified within this Action Plan are solely within the remit of the Council to resolve, to successfully maintain this high level of housing delivery, the Council will need the support of those involved in delivering homes (i.e. from landowners and housebuilders).

- 5.2 The Council has previously engaged with the development industry through the production of this HDT Action Plan and the Housing Delivery Phasing and Build-out Rate Methodology, published in the latest [Housing Supply and Trajectory Topic Paper](#). It is expected that continued engagement, in conjunction with the need for an increased number of grants of planning permission for new housing primarily on proposed site allocations in the emerging Local Plan, will result in a maintained higher rate of housing delivery across the borough.
- 5.3 As discussed in the monitoring section, it may take up to three years (and potentially longer) for the results of this Action Plan to be seen in the HDT results even if they lead to an increase in the delivery rate. If a maintained increased rate of delivery and an improvement in the HDT results is not realised within three years of the publication, then the actions raised within this Plan will be re-evaluated.

Appendices

Appendix A: Response Record from Developers

Table 6: Response Record from Developers

Organisation Consulted	Response Received
Kember Loudon Williams	
Pellings	
Bloomfields	
SJM Planning	
Chris Anderson Architects	
DHA Planning	
Coleman Anderson	
DGJP Architecture Ltd	
John Bullock Design	
Kent Design Studio	
Lambert and Foster	
Tad Planning	
DMP LLP	
Patrick Durr	
Vernacular Homes	
AHP Architects & Surveyors	
Broadlands Planning	
Douglas Moat Practice LLP	
Evisions	
Hazle McCormack Young LLP	
Iceni Projects	
JP Architect	
LT Drawing Services Ltd	
The Rural Planning Practice	
Batchellor Monkhouse	
Berkeley	Yes
Bracketts	
Dandara	
GL Hearn	
Parkerdann	
Crest Nicholson	
Persimmon	Yes
McCarthy & Stone	
Rydon	

Appendix B: Responses Received from Developers

Tunbridge Wells Borough Council Draft Housing Delivery Methodology

Developers and Housebuilders; Questionnaire

Developers Response Summary

June 2019

Developers and Housebuilders; Assumptions Made and Questions Asked

With recent changes made to the NPPF (2019) it has become increasingly important for councils to have a clear and robust evidence base to inform their Five Year Housing Land Supply. To ensure that it can exhibit a clear and robust evidence base the Council is currently in the process of preparing a housing delivery methodology to assist in the calculation of the housing land supply figures. The Council will on an annual basis contact planning applicants to seek an update on the position of their site but where a response is not received the Council will be required to conduct site visits and make assumptions on the future delivery rates of a site.

As developers, housebuilders and architects you form an important part of the local housing market and we would value your feedback and input into this document. The aim of this is to identify any barriers to housing delivery and to gain valuable first hand experience of lead-in times and delivery rates in the current housing market. We would be grateful if you could provide answers and feedback on our questions that follow by **29 March 2019**.

Please Note: while we will publish details on which developers and housebuilders we have consulted with, we will not attribute responses to individual organisations.

Generic Assumptions Made on Housing Delivery

- 1) Table 1 below shows some general assumptions on the housing market that TWBC has produced. Please complete the table and make any amendments as necessary.

Table 7: General assumptions made by TWBC

	TWBC Assumption	Assumption Valid (?)	Alternative Phrasing (if applicable)
1	Preparation and approval of both Outline and Reserved matters can take the same amount of time for planning approval – circa 1 year	1) Yes 2) No	1) There must be a more efficient system to deal with the granting of permissions. A S106 agreement should not take 12 months to finalise after committee resolution. 2) A combined outline and reserved matters application

	TWBC Assumption	Assumption Valid (?)	Alternative Phrasing (if applicable)
			would be a longer process. The work expected in an outline application can often be close to that of a full application
2	Full Council Committee agendas, elections and other political influences can impact on planning approval timescales	1) Yes 2) Yes	Elections can delay approval timescales
3	From permission to first completions on site takes on average 1.26 years for sites of between one and four units	1) No 2) N/A	1) No real experience of small schemes 2) N/A
4	From permission to first completions on site takes on average 1.62 years for sites of between five and 100 units	1) No 2) Yes	1) Usual timeframe is 9 months from a start on site 2) Subject to no abnormal works being required such as ecological mitigation
5	From permission to first completions on site takes on average 1.16 years for sites of between 100 and 500 units	1) No 2) No	1) Usual timeframe is 9 months from a start on site 2) As above or longer given the additional infrastructure being required up front
6	Approval periods (i.e. from submission of a valid application to issue of decision notice) can often be as short as 99 days (TWBC Evidence) on average for housing applications in Tunbridge Wells (Source; approvals between April 2006 – March 2018)	1) No 2) No	1) This may be correct based on TWBC experience but certainly not in the experience of [REDACTED]. [REDACTED] experience is far longer period to determine. 2) Achieving planning permission within 14 weeks is not typical
7	Discharge of conditions for housing permissions can affect starts on site and completions: timescales for discharge of conditions from receipt are likely to improve after the appointment of a Conditions Officer;	1) Yes 2) Yes	1) Providing that the Conditions Officer has the capacity to deal with the volume of information required to discharge pre commencement conditions. 2) Numerous conditions unnecessarily placed at a pre-commencement stage

	TWBC Assumption	Assumption Valid (?)	Alternative Phrasing (if applicable)
			inevitably impact start timescales
8	Judicial Reviews, Appeals and Call ins all add significantly to lead-in times	1) Yes 2) Yes	
9	Land assembly is a key stage in larger sites, potentially adding up to 6 months to lead-in times. Timescales are much shorter when the developer owns a site at outline stage	1) No 2) Yes	1) Land Assembly is usually completed before any planning application is submitted. Land Assembly doesn't usually add to lead in times for determination of a planning application
10	Site preparation works and discharging of conditions are likely to overlap on larger sites, reducing lead-in times	1) Yes 2) Yes	2) It is common practice for a housebuilder to seek to carve out such preliminary works from pre commencement conditions and obligations to enable start on site
11	Materials and labour availability can affect delivery rates once consent is granted	Yes	

Site-Specific Delivery Phasing Assumptions

The Council has also produced a list of site-specific assumptions which have been informed by local evidence and completion rates. These assumptions have been split into categories that match nationally produced evidence as follows:

Table 8: Assumptions split into categories (matching nationally produced evidence)

Site Size	Number of Units
Smallest Sites	Less than 5 dwellings
Small Sites	5-99 dwellings
Medium Sites	100-500 dwellings
Large Sites	501-2000 dwellings
Super Size Sites	2000+ dwellings

Tables 1-6 illustrate the phasing assumptions that the council proposes to make on a variety of different size sites.

2) Please mark whether you agree or disagree with our phasing estimations and if you disagree please make any necessary changes by moving the Xs.

Table 9: Smallest sites (less than five dwellings) phasing assumption (shading indicates construction start)

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5
Demolition Occurred	x				
Under Construction	x				
Demolition Not occurred (if applicable)		x			
Full Permission		x	x		
Outline Permission			x		
No Planning Activity				x	

Agree/Disagree (Y/N)

If disagree please mark amendments above

Table 10: Small sites (5-99 dwellings) phasing assumptions (shading indicates construction start)

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5
Demolition Occurred	x				
Under Construction	x				
Demolition Not occurred (if applicable)		x			
Full Permission	1)x				
Outline Permission		1)x			
Awaiting S106			1)x 2)x		
Planning Activity				x	
No Planning Activity					x

Disagree

If disagree please mark amendments above

Table 11: Medium sites (100-500 dwellings) phasing assumptions (shading indicates construction start)

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 +
Full planning permission - Under Construction	x					
Full planning permission – Construction Not Started		x				

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 +
Full planning permission – S106 Stage		1)x				
Outline Permission			x			
Outline – S106 Stage			1)x			
Planning Activity						x
No Planning Activity						x

Disagree

If disagree please mark amendments above

Table 12: Large sites (501-2000 dwellings) phasing assumptions (shading indicates construction start)

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5
Outline Permission		1)x			
Outline at S106 stage			1)x		
Outline under consideration				1)x 2)x	
Allocated site - Planning activity					x
Allocated site - No planning activity					

Disagree

If disagree please mark amendments above

Table 13: Super size sites (2000 plus) phasing assumptions (shading indicates constructed start)

Completions Within -	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Outline Permission			x				
Outline at S106 stage				1)x			
Outline under consideration					x		
Allocated site - Planning activity						x	
Allocated site - No planning activity							x

Disagree

If disagree please mark amendments above

Build out Rate and Developer Outlet Assumptions

The number of outlets involved in the delivery of a scheme can greatly influence the delivery rate of a scheme. The council has made the following assumptions regarding the number of outlets likely to be involved in the delivery of a scheme.

- 3) Please provide comments on the assumed number of outlets, if you agree with our assumptions please simply put agree

Table 14: Number of outlets

Site Size	TWBC Assumed No. Outlets	Developer Comments
<500 units	1	1) Seems fair 2) 1
>500 units	2-3	1) Seems fair 2) 1
>1000 units	3-4	1) Seems fair 2) 1

Please also provide your comments on TWBC's assumed delivery rate per outlet per year once construction has started.

Table 15: Delivery rate per outlet

Form of Housing	No. Units Delivered Per Year	Developer Comments
Affordable (@ 35% of market units)	18	1) A developer would normally try and deliver the relevant 35% of the total number of dwellings so [REDACTED] would be aiming for 24 HA dwellings per annum 2) 21
Market	52	1) A sales rate of 1 per week isn't unreasonable. 2) 39
Total	70	1) 76 2) 60

Table 9 below illustrates the average annual yield delivered on sites according to their size. The local evidence has come from historic delivery rates found across the borough and the NLP average annual yield has been taken from Nathaniel Lichfield & Partners 'Start to Finish' document (2016) ([view the Start to Finish document](#)).

- 4) Please provide feedback on what you feel would be appropriate build-out rates to apply within the borough

Table 16: Peak build-out rates (per annum)

Site Size	Local Evidence (TWBC Historic Records)	NLP Average Annual Potential Yield	Developers Comments
1-4 Units	Up to 4, Average 4	4	1) n/a 2) n/a

Site Size	Local Evidence (TWBC Historic Records)	NLP Average Annual Potential Yield	Developers Comments
5-99 Units	Up to 96, Average 44	27	1) 60 per annum 2) 60
100-500 Units	Up to 122, Average 77	60	1) 60 per annum 2) 60
500-2000 Units	No Data	103	1) 180 per annum 2) 60
2000+ Units	No Data	160	1) 240 per annum 2) n/a

5) As a final question we would appreciate any additional comments on what you think the main constraints on housing delivery within the borough are.

Please enter your comments here...

- 1) Speed of determination of planning applications and completion of S106 agreements.
- 2) No comment

**If you require this document in another format,
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