

Thanet District Council

Housing Delivery Test Action Plan

August 2019



1.0 Introduction

1.1 The Housing Delivery Test (HDT) was introduced by the Government as a monitoring tool in order to speed up the delivery of housing. The first set of results were due to be published in November 2018 but were finally published in February 2019. The HDT is an annual measurement of housing delivery in a local authority area and applies to non-metropolitan districts, metropolitan boroughs, London boroughs and development corporations with plan-making and decision-making powers.

2.0 The Housing Delivery Test

Methodology

2.1 The Housing Delivery Test Measurement Rule Book published in July 2018 updated February 2019, sets out the method for calculating the Housing Delivery Test result and confirms the publication of results in November each year. The Housing Delivery Test compares the net homes delivered over the previous three financial years, to the homes that should have been built over the same period as identified by the housing requirement for each authority.

2.2 The housing requirement is defined as follows: either that identified in a recently adopted Local Plan i.e. where the plan is less than 5 years old, or where the plan is older than 5 years old and has been reviewed and found not to require updating. For authorities with no adopted local plan or the plan is out of date, the standard methodology is applied, as set out in the HDT Technical Note (February 2019), namely, the annual average household growth plus net unmet need.

2.3 Adjustments for student and other communal accommodation is calculated by MHCLG and added into the Housing Delivery Test result and these are applied using two nationally set ratios, based on England Census data and informed by the Authority's Housing Flow Reconciliation (HFR) return.

Implications

2.4 The HDT will be used to determine the level of consequences applied to the authority where the delivery of the housing requirement has not been met. This is set out in paragraph 42 of the NPPG (updated July 2019):

“From the day following publication of the Housing Delivery Test measurement, where delivery of housing has fallen below the housing requirement, certain policies set out in the National Planning Policy Framework will apply. Depending on the level of delivery, these are:

- the authority should publish an action plan if housing delivery falls below 95%;
- a 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
- application of the presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements* set out in paragraph 215 of the Framework.

These consequences apply concurrently, for example those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published. The relevant consequence for any under-delivery will then be applied. Should delivery meet or exceed 95%, no consequences will apply.”

* Transitional arrangements in Annex 1 to NPPF set the following:

Paragraph 215. "The Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results in November 2018. For the purpose of footnote 4 in chapter 2 in this Framework, delivery of housing which was substantially below the housing requirement means where the Housing Delivery Test results published in:

(a) November 2018 indicate that delivery was below 25% of housing required over the previous 3 years;

(b) November 2019 indicate that delivery was below 45% of housing required over the previous 3 years;

(c) November 2020 and in subsequent years indicate that delivery was below 75% of housing required over the previous 3 years.”

2.5 Therefore the presumption in favour of sustainable development applies on a sliding scale under transitional arrangements. For this year November 2019, it will apply where the HDT falls below 45% and for November 2020, if this falls below 75%. The 75% threshold will apply to all subsequent years.

2.6 The District of Thanet is surrounded on 3 sides by international wildlife and habitat designations - Ramsar¹ sites, Special Protection Areas² (SPAs) and Special Areas of Conservation³ (SACs) - therefore the entire District is subject to the Habitats Regulations. This results in the entire District falling within the zone of influence where housing development is

¹ The Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat is an international treaty for the conservation and sustainable use of wetlands

² A Special Protection Area (SPA) is a designation under the European Union Directive on the Conservation of Wild Birds.

³ A Special Area of Conservation (SAC) is defined in the European Union's Habitats Directive (92/43/EEC)

likely to have a significant effect on the integrity of the designation. Therefore it is not possible to automatically apply the presumption in favour of sustainable development as a likely significant effect cannot be ruled out without the completion of an Appropriate Assessment. This is in line with paragraph 177 of the NPPF (2019) below:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

Housing Delivery Test Results November 2018 (published February 2019)

2.7 The November 2018 results for Thanet, published in February 2019, show that delivery was 44%. This is based on the standard methodology as the draft plan had been submitted for examination October 2018. Therefore the Council has to address the first two points of paragraph 42 of the NPPF, namely, to apply a 20% buffer to housing land supply and to produce an action plan.

	2015/ 16	2016/ 17	2017/ 18	Total	HDT 2018 Measurement	HDT 2018 Consequence
No. of homes required	703	709	793	2204	44%	20% Buffer Action Plan
No. of homes delivered	350	389	238	944		

3.0 How the Council is Responding: Initial Analysis

Local Plan Progression

3.1 Thanet is responding positively to this challenge - housing delivery is a corporate priority and is discussed in more detail in Section 4, setting out current initiatives. The draft Local Plan was submitted for examination in October 2018 and sets out a housing requirement of 17,140 which is more than adequately met when completions to date, permissions and allocations are taken into account. The plan is currently at examination and the hearings took place between April and July 2019. The consultation on proposed modifications is likely to be in September /October 2019 followed by consideration of comments by the Inspectors, publication of their report with formal adoption of the Plan in early 2020. The council is committed to the speedy adoption of the plan and an early review.

Past delivery rates

3.2 The Council is acutely aware that the market delivery of housing has not kept pace with an ever increasing housing requirement and is striving to bring about a step change in housing delivery. The purpose of this action plan is to set out the measures that are already in place and will continue together with future initiatives aimed at increasing housing delivery within a realistic timeframe. However, in order to identify appropriate initiatives it is vitally important to understand the nature of the local housing market and the barriers to delivery

3.3 The table below highlights the net completions on allocated and windfall sites compared with the housing requirement. Pre-HDT for years 2011/12 to 2014/15 - the adopted (2006) local and draft (2015) plans are used for the requirement. The figures below demonstrate that the Council has a positive approach to windfall sites and has a consistent record of high delivery on these sites. The table also demonstrates the step change needed in response to the increasing requirement.

Monitoring Year	Total Completions	Completions on Allocated sites	Completions on Windfall sites	Requirement at monitoring year
2011-12	307	30	277	375
2012-13	217	26	191	375
2013-14	322	73	249	375
2014-15	380	128	252	600
				HDT Requirement
2015-16	350	20	330	703
2016-17	389	79	310	709
2017-18	238	58	180	793

3.4 The above table also highlights that planning permissions are also granted in large numbers, on non-allocated (windfall) sites which demonstrates that the council is not adverse to development. Windfalls have been running at no less than 81% of all completions since 2015/16. Windfalls range from small sites of less than 10 to larger sites of 10+. In addition a variety of site sizes have been allocated in the draft plan. These range from large strategic allocations ranging from 2000 to 550 units to smaller sites ranging from 5 to 250 units. Out of the number of identified allocations 89% of site allocations are on small to medium size sites up to 250 units. Therefore a range of sites of varying capacities have been allocated which provides flexibility across the plan period.

3.5 Recent analysis indicates that the planning process is not a barrier or delay to housing delivery as for the last 3 years over 70% of applications for minor and major housing development have been determined in time - see table below. Figures from the most recent annual housing information audit show that between 2018-19 planning permission was granted for 1001 units (net).

2016/17 Major Housing Minor Housing	79% in time 79% approved 78% in time 75% approved
2017/18 Major housing Minor Housing	78% in time 78% approved 71% in time 77% approved
2018/19 Major Housing Minor Housing	77% in time 83% approved 73% in time 69% approved

Other factors contributing to the low levels of delivery

Perception

3.6 Thanet has for many years contained areas of deprivation has Thanet has 18 out of 84 Lower-layer Super Output Area (LSOAs) in the most deprived 10% with a score of 1. A further 48 score between 2 and 5 - source: DCLG English Indices of Deprivation 2015. Further analysis by Kent County Council highlights that Thanet is the most deprived local authority in Kent and ranking 21 out of 326 nationally, placing it within England's 10% most deprived authorities. However, this is an improvement on 2010 Indices of Multiple Deprivation (IMD) figures which ranked Thanet 49th. The highest ranking LSOA in Kent is Cliftonville West ward which was ranked 4th out of 32,844 LSOAs in England placing it within England's most deprived 1% of small areas. However, it also has pockets of least deprived LSOAs in England. The Council has worked hard over the years and has in place various initiatives to address this. However, it is probably fair to say that there appears to be a continued perception of deprivation which reduces market attractiveness for housebuilding, particularly amongst volume housebuilders.

3.7 Perception has a significant impact on how the development sector identifies growth areas and whether locations are viable. Thanet's historic weak economy and low Gross Development Value has been a barrier to large scale development (traditional commercial models are based on sales to cross subsidise planning obligations and affordable housing). This area needs further analysis and it may be appropriate to consider a more focussed marketing programmes for the area, building on current initiatives to help boost the attractiveness of the housing market and building on the positive thrust and substantial green-field opportunities provided by the new Local Plan.

Land trading market

3.8 Initial work on the types of developers that are present in the local market has revealed that there is a general absence of volume housebuilders with a preponderance of SMEs. Within the local market, there appears to be a high number of agents and land promoters acquiring land or applying for planning consent with the sole intention of adding value and selling the site on. This has presented a challenge for delivery as with no identified developers and with limited capacity or incentive to build out their consents, sites have been stalled. There are a number of sites which have achieved a technical start on site which have yet to be built out. Further research is required on this matter, and this is addressed later in relation to annual monitoring.

Land ownership issues

3.9 A key constraint faced by the Council is that the majority of sites/permissions are in third party ownership with relatively few in Council/public ownership. Therefore delivery is strongly predicated on landowners and developers' perception and confidence in the local sales market, which in turn, influences completion rates. However, this may change in the future as Homes England are now involved, at various levels, in a number of development sites in the District and have commenced a "Wave" funding programme where they establish strategic partnerships with large Housing Associations.

Land and Property Values

3.10 Linked to the previous issues, property values in Thanet are lower than in other East Kent authorities. For example in 2018, Thanet experienced the lowest average price paid per property with £260,030 which when compared to Sevenoaks is just over half the figure of £519,211. Also during 2018 Thanet had the lowest average price for a detached property at £400,252. The table below compares overall average price by house type for each Kent authority.

	Overall average price paid	Detached	Semi-detached	Terraced	Flat / Maisonette
England & Wales	£297,220	£404,718	£254,305	£241,056	£299,531
South East*	£379,717	£580,718	£366,912	£307,625	£231,841
Kent	£339,689	£522,967	£331,075	£276,284	£206,985
Ashford	£328,503	£470,326	£301,934	£237,231	£186,774
Canterbury	£335,028	£443,748	£307,230	£304,643	£203,572
Dartford	£330,196	£560,648	£368,981	£317,832	£227,085
Dover	£274,428	£424,064	£261,779	£223,635	£159,795
Gravesham	£318,419	£495,426	£344,502	£278,278	£172,852
Maidstone	£341,924	£515,412	£335,474	£262,313	£175,839
Sevenoaks	£519,211	£848,838	£447,754	£360,669	£297,268
Folkestone & Hythe	£283,199	£425,504	£289,090	£233,944	£184,099
Swale	£272,062	£402,177	£271,017	£230,357	£155,333
Thanet	£260,030	£400,252	£277,902	£229,694	£157,632
Tonbridge & Malling	£394,086	£592,354	£381,548	£308,422	£244,702
Tunbridge Wells	£473,905	£765,994	£448,547	£400,869	£285,153
Medway U.A.	£264,526	£436,273	£293,242	£232,693	£177,204

Source: HM Land Registry Open Data Standard Reports

Presented by Strategic Commissioning - Analytics, Kent County Council

*The Land Registry "South East" region consists of the GOR South East region plus Hertfordshire and Essex

3.11 However, between 2017 and 2018 Thanet has seen the highest annual increase in overall property prices in percentage terms between 2017 and 2018 with a rise of +7.3%. This equates to an actual rise of £17,675 (Source: Kent County Council House Price Annual Bulletin 2018). There has been a rise of 6.7% in the price paid for new build properties and a 4.9% rise in the price of older properties in Thanet. Furthermore, the District saw the highest number and proportion of older property sales with 2,306 sales, which account for 98.4% of all sales in Thanet during 2018.

3.12 Although this shows a slight improvement in local housing market values, further analysis by KCC shows that Thanet still has the lowest average price for both new and old properties with £281,528 and £259,676 respectively in the county. In comparison the adjacent neighbouring Districts of Dover and Canterbury are higher for both new and old properties, with £287,732 and £272,304 (Dover) and £372,589 and £332,789 (Canterbury) respectively.

3.13 Although market values may be increasing and this may benefit the market, it does not assist in addressing the affordability issue. Previous analysis by the housing team show that an average house price of £241,000, is 10 times the average work based earnings. Therefore to purchase an average lower quartile house in the cheapest postcode areas of Thanet, residents would need a weekly household income of £732 (£38,000p.a.), plus savings of around £25,000. Currently 19,471 households or 29% of the population are on a low income, which is defined as less than £15,988 per annum. Mean district earnings are £462.50 per week, £24,050 per annum and median district earnings are £479 per week which is £21,554 per annum. This is within the bottom 20% of the whole of England. Only 19.12% of households are in the lower managerial and professional occupations. This presents the

challenge that more than 80% of the population in Thanet, cannot afford an averagely priced terraced house.

Costs, capacity and skills

3.14 A major factor in sites not coming forward early, is the viability gap between costs and values. A developer's margin will be based on a residual land approach, which is essentially calculated by subtracting the costs of achieving that development from the revenue (sales income) generated by the completed scheme (gross development value). There are a number of factors impacting on the margins achievable by developers, which include land values, build costs, infrastructure costs and sales values.

3.15 In Thanet, average sales values are around £2,323 per sq m (ONS, 2017), compared to £3,114 per sqm in Canterbury. Build costs also vary with a range of £1,500 to £2,400 in Thanet (with higher costs on smaller sites of less than 10 units) and around £1,700 in Canterbury. This illustrates that the cost to value is low and the traditional commercial model of 20% on profit on sales or costs is not readily achievable in Thanet. Therefore, the likelihood of sites being built out and at a pace to match housing need may be dependent on developers taking a lower profit margin. The greater risk of negative gross development values, are considered too high risk to build out homes and land is often traded once planning has been granted. This together with a high number of land agents who also expect a share of the profit margins, create the risk that values are overinflated and this in turn could be a reason for sites stalling. The Viability Assessment for the local plan produced by Dixon Searle Partnership suggests that viability is variable across the District, particularly when strategic infrastructure costs are factored in, and can have an impact in some areas. As to be expected higher value areas are performing better which is a positive trend, however, more marginal areas may need some kind of intervention to activate the market.

3.16 Viability is further constrained as analysis of new build completions suggests that majority of delivery is being driven by small and medium sized house builders who generally are more likely to be risk averse (i.e. a smaller firm is at significant risk if market sales are not achieved).

3.17 Constraint in the local labour market also has an impact on build costs. As evidenced by both the average cost data provided above and cost data from the council's own tendered development programme. The availability of a suitably qualified and skilled workforce is likely to be a significant constraint to accelerating local delivery and will be reflected in costs. Recently officers have engaged with local developers and housing associations working in the area to identify barriers to delivery and the lack of a consistent and experienced supply chain was identified as a key risk to achieving increased delivery. The draft local plan is seeking to remedy the skills gap by applying which include a clause in various economic development policies expecting developments to contribute towards the Local Employment and Training Fund (Policies SP03, E01 and SP07).

4.0 Key Actions and Initiatives

4.1 As previously set out, the Council is acutely aware that historically, housing delivery has been slow and a step-change is needed to meet increasing requirements. A number of actions and initiatives have already been put in place and are set out in tables later in this section. A number of key actions are set out in detail below.

Adoption of the Local Plan

4.2 The draft Local Plan identifies sufficient land to meet the full objectively assessed need for the Plan period to 2031. The Council has provided ample opportunity to enable housing delivery through land allocations and the granting of planning permission on suitable non-allocated sites (windfalls). The previous LP strategy (the 2006 Plan) relied predominantly on development on previously-developed land. The new Plan sets a strikingly different strategic approach that identifies a series of strategic greenfield sites; provides a greater mix of development site, and engages and promotes substantial transport infrastructure and the new Parkway station.

4.3 As previously mentioned the Plan is still at Examination although hearings have now been completed. The timetable is for consultation on modifications in autumn 2019, receipt of Inspectors' report in early 2020 with adoption early 2020. This should give confidence to the development industry through confirmation of land allocations.

Infrastructure funding

4.4 ***Parkway Station:*** The creation of a Parkway station (expected to open in 2022) which will reduce journey time to London to just over an hour, should improve market conditions and boost local delivery. As part of the Local Plan process, the Council commissioned Wessex Economics⁴ to consider the impact of the Thanet Parkway Station on housing delivery. Early indications show that, currently Thanet has the weakest new homes market in Kent and Medway as based on the sales value of new homes, relative to the prevailing values of existing residential properties. It is suggested that as most of the major new strategic allocations will be easily accessible to the new Thanet Parkway Station together with the shorter journey times which can be used in the marketing of these new developments, this should improve housing delivery.

4.5 The Council itself has committed £2M of its budget towards its construction. Further funding for the Parkway Station (£14m) has recently been confirmed by the South East LEP. KCC has also recently confirmed that the project is now fully funded, and that they are about to submit a revised planning application for the scheme.

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<https://www.thanet.gov.uk/wp-content/uploads/2019/03/CD4.7-TPW-Station-The-Impact-on-Housing-Delivery-Final-Report-190325.pdf>

4.6 **Inner circuit / A28:** Viability work for the Local Plan indicates that the Inner Circuit can be delivered through development contributions. However, to accelerate the delivery of infrastructure and housing, the Council (with KCC) is seeking to attract Government funding to bring infrastructure forward at an earlier stage.

4.7 Transport for the South East recently submitted a Major Road Network Fund bid to Government for key road schemes in the South East. This bid identifies the top ten priority schemes in the South East, which includes a relief road for the A28 between Birchington and Margate (which is part of the Inner circuit scheme proposed in the draft Local Plan).

Housing Company

4.8 The Council recently decided (July 2019) to establish a wholly owned housing company. The aims of this venture are to:

- enable the delivery of new homes, that would otherwise not be delivered, with the ability to directly acquire land and construct homes;
- acquire homes with the aim of improving conditions, management standards and affordability for the benefit of residents;
- supplement existing housing programmes and funding within the Council's HRA;
- offer a wider range of housing tenures and costs, in addition to existing provision; and
- create a financially viable and sustainable vehicle for the acquisition, development and management of housing.

4.9 The provision of new homes to meet the needs of local people was a key priority. Pressures on both social and affordable rented housing and on the private rented sector were increasing and new solutions were required. The Council had already committed resources from the Housing Revenue Account (HRA) to new build and acquisition programmes and will have provided over 150 new homes through this work by 2020/21.

4.10 The housing company provides an opportunity to supplement and expand the Council's current work to provide new homes with additional housing development or acquisition programmes providing greater flexibility.

Empty Homes

4.11 The council has a strong track record of bringing empty homes back into use. Work is focused on long-term empty homes, defined as having been empty for more than 6 months. In June 2018, there were 2,868 empty homes of which 1,319 were second homes. A range of enforcement powers, alongside loan funding for landlords and owner occupiers are used. Negotiation with owners and enforced sale procedures have proved to be the most consistently effective interventions. The Council has a dedicated page on the website (see link below), which explains the initiative and encourages the reporting of empty homes either by the public or property owner along with advice and ways in which the Council can help.

4.12 The table below shows the total number of empty properties brought back into use by monitoring year.

Monitoring year	Total number of units brought back into use
2011/12	117
2012/13	113
2013/14	118
2014/15	119
2015/16	127
2016/17	126
2017/18	248

4.13 This demonstrates the Council's commitment to bringing forward housing from a range of sources. As well as contributing to overall housing supply, work to return empty homes to use makes a positive impact on neighbourhoods, helps reduce anti-social behaviour and improves the street scene. The Council will continue to invest in work to return empty homes to use and set out its ambition in a detailed empty homes plan. Further information on this initiative is available at <https://www.thanet.gov.uk/info-pages/report-an-empty-property/>

Detailed Annual Monitoring

4.14 The Council has for the last three years carried out a more in-depth survey, with developers and agents of sites of 10 or more units, of projected delivery rates for housing sites together with a request for information on any known constraints or problems hindering the delivery of housing.

4.15 Furthermore, the annual survey of all sites, has for the last 2 years, refined the under construction category into 7 stages as set out below.

- 1 = no visible progress - site has stalled
- 2 = site cleared
- 3 = footings
- 4 = walls
- 5 = roof/building shell
- 6 = internal works
- 7 = nearing completion

4.16 This has allowed greater accuracy in predicting completions on site and help inform future phasing and completions rates. The Council intends to carry out further analysis on this to build up a picture of completion rates by site typology. This work is intended to

supplement further root cause analysis utilising the PAS (Planning Advisory Service) recommended guidance and methodology. The Council has taken part in the PAS workshops on the Housing Delivery Test and Action Plans to ensure that it is adopting best practice in this area.

Other initiatives suggested in NPPG

4.17 The table below sets out the Government's suggestions for informing housing delivery and potential actions, many of these have already or are in the process of being addressed by the Council.

Para 50 NPPG - What could local planning authorities review as part of the action plan?	TDC action	Timescale SHORT (1-2 yrs)/ MEDIUM (3-5 yrs)/ LONG (6+) term / ONGOING
Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales	Undertaken as part of annual housing monitoring.	Ongoing analysis
Barriers to delivery on sites identified as part of the 5 year land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)	Include in annual phasing/ delivery survey with developers of consented and allocated sites	Ongoing and further analysis required
Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits	This is regularly monitored (see Table on p6)	Ongoing
Whether the mix of sites identified is proving effective in delivering at the anticipated rate	The Local Plan contains a mix of sites - urban/urban edge/villages; brownfield/ greenfield; large/small	Short term - to be confirmed on adoption of the Local Plan
Whether proactive pre-planning application discussions are taking place to speed up determination periods	Pre-application advice is available to developers and is frequently used by applicants	Ongoing

The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery	Dialogue with statutory authorities, developers and landowners is undertaken as and when required.	Ongoing Could be improved through establishment of more regular meeting of a developers' / delivery forum
Whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable	Being addressed through the Local Plan process - Inner Circuit, in particular. Joint Transport Strategy with KCC; LEP, KCC, TDC funding for Parkway Station	Ongoing through Local Plan process and application through funding schemes where applicable. Application to suitable funding streams to continue as and when available.

4.18 In addition, para 51 of the NPPG sets out the actions that local planning authorities could consider as part of the Action Plan. Again a number of these are already being addressed by the Council.

Suggested Actions (Planning Practice Guidance Paragraph 51)	TDC position	Timescale SHORT (1-2 yrs)/ MEDIUM (3-5 yrs)/ LONG (6+) term / ONGOING
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	Has been addressed through Local Plan process. Will be revisited as part of Local Plan review	Medium
Working with developers on the phasing of sites, including whether sites can be subdivided	Being addressed through Local Plan process.	Ongoing

Offering more pre-application discussions to ensure issues are addressed early	Council’s Planning Applications Team already undertakes pre-application discussions on housing proposals. The Team also has regular meetings with local agents to discuss service issues	Ongoing
Consider the use of Planning Performance Agreements (PPAs)	TDC’s Planning Applications Team already use PPAs for strategic allocations, non-strategic sites of 100 or more units and for non-strategic allocations that have significant public interest. Examples to date have included non residential developments such as Dreamland and a new hotel development on Margate seafront.	Ongoing
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites	There have been 3 “Calls for Sites” and 3 consultation stages when sites have been proposed through Local Plan process. The next opportunity for a call for sites will be through any review and update of the Local Plan.	Medium
Revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies	Addressed through Local Plan process. Will be re-evaluated through local plan review	Ongoing and medium
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use	N/A	N/A

Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed	Addressed through Local Plan process; annual Housing Information Audit; AMR; post-application discussions. This could be improved - see future actions table	Ongoing
Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed	An internal review of conditions, including pre-commencement conditions, was undertaken in 2018. The Council already has a dedicated Conditions Officer whose role is to discharge conditions within the shortest timescale possible.	Completed
Ensuring evidence on a particular site is informed by an understanding of viability	Undertaken at both Local Plan stage and where appropriate, through the planning application process. The council retains consultants to advise on viability assessment in connection with planning applications.	Ongoing
Considering compulsory purchase powers to unlock suitable housing sites	Council is currently developing a more pro-active approach to the CPO of stalled sites (see additional actions below).	Ongoing
Using Brownfield Registers to grant permission in principle to previously developed land	Unable to apply PIP because of Habitats Regulations requirements which apply to the whole District due to the presence of SPA, SAC and Ramsar designations.	Brownfield land register is reviewed annually
Encouraging the development of small sites and medium-sized sites	Local Plan already does this. Historically good level of “windfalls” on small sites. No objection to higher density as long as that does not compromise other key policy objectives (eg: housing mix as identified in the SHMA; and	Short term To be confirmed by the adoption of the local plan and monitored annually through the Housing Information Audit.

	other requirements such as open space provision)	
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Other initiatives the Council is involved in to help increase housing delivery in the District

Other Initiatives/ Actions	Timescale	Team Lead
Adopt the Local Plan following receipt of the Inspectors' report.	Short term / ongoing Early 2020	Strategic Planning Manager Members
Refining the annual monitoring process to provide additional clarity on "stalled sites", by introducing "under construction" stages to monitor progress more closely. This will inform how long particular sites take to deliver completions and the likely build out rates.	Ongoing	Strategic Planning Team
Combining Housing and Planning Teams in single Service to promote closer working	2018	Completed
Corporate accreditation to the Housing & Finance Institute's Housing Business Ready Programme	2017	Completed
Working with Homes England in district to assist with the delivery of some key sites and release of publicly owned land	Ongoing	Planning Team Housing Team Strategic Planning Team
Delivery of the Council's 150-home Housing Revenue Account development programme	Ongoing since 2012 This includes 2 strands - Intervention which involves the purchasing of existing properties and new builds on	Housing Team

	Council land.	
Council officers (and KCC officers) involved in various grant funding applications to support the delivery of new infrastructure (Housing Infrastructure Fund; Local Growth Fund)	Ongoing (for example): <ul style="list-style-type: none"> • HIF Funding for infrastructure related to the Manston Green site • “Pinch-point” funding for Westwood Cross • LGF for Parkway Station 	Strategic Planning Team HoS Housing & Planning KCC KCC Highways
“Kent Deal” - a Kent and Medway-wide proposal, with East Kent defined as the growth area within Kent and Medway”. In return for significant new infrastructure investment and planning flexibilities, this would deliver an acceleration in housing delivery. Being developed with MHCLG and Homes England.	Ongoing - submission to Government anticipated Autumn 2019	Leader of the Council/Chief Executive/Strategic Partnerships Manager
More recently, the Council has met both Homes England, and different Departments from MHCLG, to develop these ideas, with a view to accelerating housing delivery in the district.	Ongoing	Strategic Planning Team HoS Housing and Planning Housing Strategy & Projects Manager MHCLG Homes England
The Council has also, over the last few years, granted planning permission on a number of non-allocated sites to boost housing supply, where those proposals were considered suitable and acceptable. Hence the Council has a high windfall rate	Ongoing	Planning Team Housing Team Strategic Planning Team
Working with PAS on the Council’s Action Plan and participating in the Action plan workshops	Completed	Strategic Planning Team PAS

Empty Homes programme - bringing empty homes back into use	Ongoing Regular monitoring as part of the AMR since 2016	Housing team Strategic Planning Team
Establish a housing company Short / Medium term	Target to start trading by April 2020	Housing Strategy & Projects Manager
Appoint a Development Implementation Officer	Short term	Housing Strategy & Projects Manager

Potential Future Initiatives

Potential Action	Timescale	Team Lead
Undertake a more detailed root cause analysis on sites using PAS template and guidance, building on work already undertaken by Housing Strategy & Projects Manager	Ongoing	Strategic Planning Team Planning Team Housing Team
Set up a developers/ delivery forum/board	Short/Medium term	Strategic Planning Manager Development Management Manager Housing Strategy & Projects Manager
Engage with developers (possibly through a workshop) on <ul style="list-style-type: none"> ● standard approach to delivery and lead in times ● barriers to housing delivery and attractiveness of Thanet housing market ● greater analysis of build out rates on current sites and factors affecting this 	Short / Medium term	Strategic Planning Team Planning Team Housing Strategy & Projects Manager
Undertake housing market and land value analysis	Short term	Housing Strategy & Projects Manager Housing team

Investigate District marketing campaign - to attract more national developers and improve perception of District	Short term	Strategic Planning Team Housing Strategy & Projects Manager Communications team
Analysis of type of developers engaged in District	Short / Medium term	Strategic Planning Team Housing Strategy & Projects Manager
Member and officer training on 5 YS and HDT as part of general planning training.	Short term	Head of Housing and Planning

5.0 Consultation

5.1 As the Council has been involved in the Local Plan examination this summer and given the given timescales it has not been possible this year to consult fully on Action Plan, it is intended to do this in the future. However, there has been consultation with stakeholders on delivery of major sites in the lead up to and during the examination with a full and robust discussion on site delivery on Hearing Days 4 to 7 on 9 - 11 April, and Hearing Day 7 on 12 April.

5.2 Further consultation on housing land supply and delivery will take place during the autumn as part of the examination process together with the statutory consultation on the proposed modifications.

6.0 Project Management and Monitoring Arrangements

6.1 The Council already has existing monitoring processes in place, such as the annual land use surveys for example, for housing and delivery. These existing surveys will be enhanced to provide the data necessary to inform any future action plans as they will use the same basic datasets. Much of this data already exists in the Annual Monitoring Report (AMR) which is published in December each year and it is intended to review the Action Plan through the AMR process.

7.0 Conclusion

7.1 This Housing Delivery Test Action Plan will establish a baseline of data for this year. It will evolve and be reviewed as more data and analysis becomes available. It is seeking to understand and build up a more detailed analysis of the local housing market. This will build on initial evidence to establish whether perceived barriers to delivery do indeed exist in the local market and if they can be overcome. It will identify where further analysis is needed and identify other initiatives that could be considered in order to accelerate housing delivery.

7.2 It is anticipated that once the local plan is adopted the HDT will improve as housing requirements will have been established through the local plan process. The Council is hopeful that the market will improve once the necessary infrastructure such as the Parkway station and new “inner circuit” highways improvements have a definitive programme and planning permission. This will allow for these aspects to be used in the marketing of sites as set out in the Wessex Economics study which will help to improve the attractiveness of the local housing market to developers.