

Thanet District Council

Housing Delivery Test Action Plan

Update December 2020



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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 finally published in February 2019 with the second set for November 2019, published in February 2020. 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 For authorities with no adopted local plan or the plan is out of date, the standard methodology is applied, as set out in the HDT Technical Note (February 2019), namely, the annual average household growth plus net unmet need.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 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:

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)

“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

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		

November 2019

2.8 Following the adoption of the Thanet Local Plan in July 2020, the Council requested that the 2019 HDT be recalculated in line with national Planning Policy Guidance. MHCLG have issued the updated position below.

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence
2016-17	2017-18	2018-19		2016-17	2017-18	2018-19			
600	600	600	1800	389	238	296	923	51%	Buffer

2020 Covid-19 Pandemic

2.9 On 23rd March 2020 the UK went into its first national lockdown in response to the Covid-19 pandemic which initially lasted until 4th July. Following the lockdown, various procedures, restrictions and guidance were issued to help prevent the spread of Covid. As a result work on construction sites halted. It is estimated that a possible delay of 3-6 months for the delivery of housing completions on those sites which were under construction prior to March.

2.10 The pandemic also meant that the annual survey of housing completions were significantly delayed and have had to be scaled back and alternative monitoring methods were employed. This included the use of Council tax records, building control records, google maps and developer websites. In addition the Council wrote to agents and developers of sites with planning permission or allocations to gauge the delivery of sites and also how the pandemic was affecting this delivery. In most cases it was thought that a 3-6 month delay on delivery was likely however, once the lockdown was lifted, developers were keen to get back on site and construction has continued on most sites. Subsequently, through various levels of lockdown, development has continued on a range of sites around the district.

2.11 The Council produced a [Recovery Plan](#) "Supporting our Communities: Thanet District Council's Plan for Recovery" which sets out the Council's commitment to "working with developers and builders to recover/accelerate housing delivery" following the lockdown.

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 Council formally adopted the Plan on 9 July 2020. The Council is now committed to a speedy early [update](#) of the adopted Plan.

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
Monitoring Year	Total Completions	Completions on Allocated sites	Completions on Windfall sites	Requirement at monitoring year
				HDT Requirement
2015-16	350	20	330	703
2016-17	389	79	310	709
2017-18	238	58	180	793
2018-19	296	7	289	1114

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 76% 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).

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
2019/20 Major Housing Minor Housing	76% in time 88% approved 73% in time 66% approved

Other factors contributing to the low levels of delivery

Perception

3.6 Thanet has for many years contained areas of deprivation. In 2015 and 2019, Thanet had 18 out of 84 Lower-layer Super Output Area (LSOAs) in the most deprived 10% with a score of 1. Further analysis⁴ of the IoD 2019 by Kent County Council highlights that Thanet remains ranked as the most deprived local authority in Kent in all of the summary measures for local authorities. Nationally in 2019, Thanet ranked 34 out of a total of 317 local authorities. 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 sites identified 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

⁴ https://www.kent.gov.uk/__data/assets/pdf_file/0006/7953/Indices-of-Deprivation-headline-findings.pdf

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 2019, Thanet experienced the lowest average price paid per property with £268,614 which when compared to Sevenoaks is just over half the figure of £510,555. The table below compares the overall average price by house type for each Kent authority.

Table 1: Overall average price paid per property by type: 2019

	Overall average price paid	Detached	Semi-detached	Terraced	Flat / Maisonette
England & Wales	£300,054	£408,750	£257,272	£243,955	£298,662
South East*	£383,324	£578,531	£365,716	£306,642	£231,907
Kent	£342,070	£520,314	£331,140	£276,958	£206,495
Ashford	£327,238	£480,877	£296,446	£245,322	£181,073
Canterbury	£345,434	£472,875	£314,226	£291,148	£201,823
Dartford	£336,375	£529,483	£374,349	£320,845	£217,602
Dover	£276,493	£410,367	£266,487	£230,536	£165,257
Folkestone & Hythe	£289,418	£434,434	£296,913	£233,297	£176,653
Gravesham	£320,817	£522,286	£336,155	£275,216	£174,289
Maidstone	£336,426	£499,026	£329,016	£263,209	£175,313
Sevenoaks	£510,555	£846,589	£436,830	£350,240	£294,033
Swale	£280,413	£408,237	£278,535	£231,162	£167,442
Thanet	£268,614	£410,475	£277,944	£236,469	£167,786
Tonbridge & Malling	£390,988	£571,261	£376,831	£319,279	£236,022
Tunbridge Wells	£471,801	£733,500	£440,827	£388,191	£300,002
Medway U.A.	£271,745	£436,977	£291,649	£233,151	£188,719

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 Property prices in Kent have risen 0.7% compared to one year ago. The average price rise across the county varied from 3.3% in Thanet to 0.8% in Dover and Gravesham. Thanet has seen the highest annual increase in overall property prices in percentage terms between 2018 and 2019 with a rise of +3.3%, which equates to an actual rise of £8,584(Source:

Strategic Commissioning Statistical Bulletin August 2020 - Property prices & sales in Kent: 2019).

3.12 Within Kent's local authorities, Thanet has seen the highest increase in absolute and percentage terms in price for new properties between 2018 and 2019 with a rise of +£51,324 (+18.2%). However, Thanet saw the smallest number of new property sales with 33 sales accounting for 1.1% of all sales in Thanet during 2019. In contrast, Thanet saw the highest number and proportion of older property sales with 2,126 sales, which account for 98.5% of all sales in Thanet during 2019. Thanet saw the highest number of sales of flats / maisonettes during 2019 with 507 sales of this type.

Table 8: Number of sales of *NEW and OLDER properties: 2019

	Total Sales	**New Properties		Older Properties	
		Number	% of total	Number	% of total
England & Wales	814,644	104,981	12.9%	709,663	87.1%
South East**	184,589	24,750	13.4%	159,839	86.6%
Kent	22,767	2,722	12.0%	20,045	88.0%
Ashford	1,950	240	12.3%	1,710	87.7%
Canterbury	2,217	210	9.5%	2,007	90.5%
Dartford	1,907	495	26.0%	1,412	74.0%
Dover	1,837	217	11.8%	1,620	88.2%
Folkestone & Hythe	1,792	167	9.3%	1,625	90.7%
Gravesham	1,157	61	5.3%	1,096	94.7%
Maidstone	2,331	337	14.5%	1,994	85.5%
Sevenoaks	1,512	154	10.2%	1,358	89.8%
Swale	2,175	246	11.3%	1,929	88.7%
Thanet	2,159	33	1.5%	2,126	98.5%
Tonbridge & Malling	1,993	330	16.6%	1,663	83.4%
Tunbridge Wells	1,737	232	13.4%	1,505	86.6%
Medway U.A.	3,829	437	11.4%	3,392	88.6%

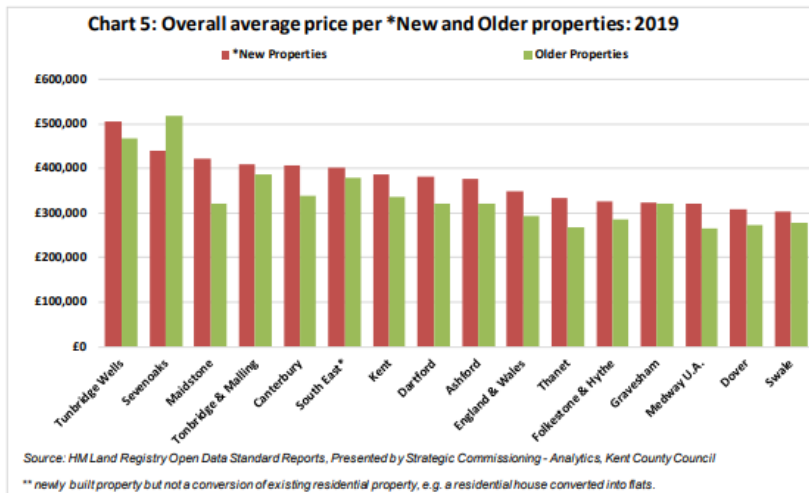
Source: HM Land Registry Open Data Standard Reports

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

** newly built property but not a conversion of existing residential property, e.g. a residential house converted into flats.

3.13 Although this shows a slight improvement in local housing market values, further analysis by KCC shows that Thanet still has the lowest average price of older properties - £267,616 in the county. Across Kent, Thanet has the highest percentage difference between the average price paid for new build and older properties at 19.1% (Source: Strategic Commissioning Statistical Bulletin August 2020 - extract: Overall average price paid per *New and Older properties: 2019). Across Kent, new build stock in Thanet attracts the second highest premium in comparison to resale stock.



3.14 Although market values may be increasing and this may benefit the market, it does not assist in addressing the affordability issue. Analysis by the Housing Team shows that in 2019 median house prices in Thanet were £234,500 this was almost the same as the median for England (£235,000). However, this is below the equivalent figures for Kent (£290,000) and much lower than that for the South East (£320,000). Since 2002 house prices have increased by 174% compared to 126% nationally, 132% across the South East and 146% in Kent. Median house price⁵ to workplace-based earnings ratio for 2019 shows that the median gross annual workplace-based earnings was the lowest in Kent at £25,019 and the median house price was £240,000. This means that the ratio of median house price to median gross annual workplace-based earning is 9.59 highlighting the affordability issue. However, as those working in the borough earn less than those living in the borough the residence based ratio is 9.29. Although in the last year workplace based earnings have increased substantially (Workplace based £25,019 Vs Residence Based – £25,821). However, house prices by either measure are still unaffordable and would require those purchasing a house to have considerable equity in order to support a mortgage (Sourced: Housing Needs Update Thanet District council July 2020).

Costs, capacity and skills

3.15 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.

3.16 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

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<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

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.

3.17 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).

3.18 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 SP05 and E01).

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 Thanet Local Plan was adopted on the 9th July 2020 and identifies sufficient land to meet the full objectively assessed need for the Plan period to 2031. The adoption of the plan should give confidence to the development industry by confirming the strategic and other allocations. 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.

Infrastructure funding

4.3 ***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 Economics⁶ 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.

4.4 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. The Government recently announced funding of £12 million under the Getting Building Fund. KCC has recently granted planning permission for the proposed station.

4.5 ***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.

4.6 KCC have submitted a funding bid for a relief road for the A28 between Birchington and Margate (part of the Inner Circuit scheme in the Local Plan) under the Government's Main Road Network Fund, for key road schemes in the South East. Transport for the South East have identified the proposed scheme as one of the top ten priority schemes in the South East.

The Council's Development Programme

4.7 The Council is committed to the direct delivery of new affordable homes. It has already committed over £33m to the delivery and acquisition of new affordable homes, providing 191 homes between 2015 and 2020. The council aims to continue this work and to explore new ways to bring homes forward. These homes have been funded and delivered with the council's Housing Revenue Account and have been supported with grant funding from Homes England, Coastal Communities funding from the South East LEP and from the use of right-to-buy 1-4-1 receipts.

4.8 The council has some limited funding from commuted sums from section 106 agreements for the delivery of affordable homes and these resources are available to support new innovative approaches or to support sites that might otherwise be unviable. We are

⁶ <https://www.thanet.gov.uk/wp-content/uploads/2019/03/CD4.7-TPW-Station-The-Impact-on-Housing-Delivery-Final-Report-190325.pdf>

further considering the potential to borrow additional funding within the council's HRA, for the acquisition of section 106 affordable homes from developers without the need for subsidy.

4.9 The council has acquired a commercial building for conversion to residential units within its general fund, for use as temporary accommodation for homeless households. Further opportunities to extend supply within the HRA, general fund or through an arms length housing company will continue to be explored.

Empty Homes

4.10 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. This had risen to 2,976 empty homes of which 1,610 were second homes, by April 2020. 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.

4.11 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
2018/19	322
2019/20	159

4.12 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

4.13 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.

4.14 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

4.15 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

4.16 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	Update 2020
Barriers to early commencement after planning permission is	Undertaken as part of annual housing monitoring.	Ongoing analysis	Ongoing as part of survey work.

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	Update 2020
granted and whether such sites are delivered within permitted timescales			
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	Ongoing as part of survey work.
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	Ongoing as part of survey work.
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	Local Plan adopted in July 2020	Local Plan adopted in July 2020
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	Ongoing

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	Update 2020
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 on a regular basis. Housing Forums take place to encourage development, and address barriers. Regular meetings take place with Registered Social Landlords active in the area and developers and SME's	Ongoing Could be improved through establishment of more regular meeting of a developers' / delivery forum	Ongoing as part of the review of the local plan
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.

4.17 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	<p>Has been addressed through Local Plan process.</p> <p>Will be revisited as part of Local Plan review.</p> <p>Update 2020: A new call for sites will be launched in 2021. The Council's intention is to take a rigorous approach to assessing the delivery potential of proposed sites.</p>	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, including multiple meetings for strategic housing allocations. 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 strategic residential allocations at Birchington and Westgate.	Ongoing

Suggested Actions (Planning Practice Guidance Paragraph 51)	TDC position	Timescale SHORT (1-2 yrs)/ MEDIUM (3-5 yrs)/ LONG (6+) term / 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, likely to be early 2021.	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

Suggested Actions (Planning Practice Guidance Paragraph 51)	TDC position	Timescale SHORT (1-2 yrs)/ MEDIUM (3-5 yrs)/ LONG (6+) term / ONGOING
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 other requirements such as open space provision)	Short term To be confirmed by the adoption of the local plan and monitored annually through the Housing Information Audit.

Other initiatives the Council is involved in to help increase housing delivery in the District

Other Initiatives/ Actions	Timescale	Team Lead	Progress review 2020
Adopt the Local Plan following receipt of the Inspectors' report.	Short term / ongoing Early 2020	Strategic Planning Manager Members	Plan adopted July 2020
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	Introduced - now part of annual monitoring process
Combining Housing and Planning Teams in single Service to promote closer working	2018	Completed	N/A.
Corporate accreditation to the Housing & Finance Institute's Housing Business Ready Programme	2017	Completed	N/A.
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 Strategy & Projects Team Strategic Planning Team	Ongoing

Other Initiatives/ Actions	Timescale	Team Lead	Progress review 2020
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 Council land. Acquisitions programme ongoing - purchasing of new units and existing empty units.	Housing Strategy & Projects Team	The 2020 Housing Strategy commits to deliver an additional 40 units of accommodation until 2023.
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"> ● "Pinch-point" funding for Westwood Cross ● LGF and other funds for Parkway Station ● Main Road Network Fund for A28 relief 	Strategic Planning Team HoS Housing & Planning KCC KCC Highways	
The Kent & Medway Infrastructure Proposition "Infrastructure First" (known as the "Kent Deal"). In return for significant new infrastructure investment and planning flexibilities, this would deliver an acceleration in housing delivery. Being developed with	Ongoing	Leader of the Council/Chief Executive/Strategic Partnerships Manager	Submitted to Government for consideration. This work also feeds into the current Thames Estuary Project, being overseen by the Thames Estuary Growth Board and Homes England, which is looking at infrastructure and investment to support

Other Initiatives/ Actions	Timescale	Team Lead	Progress review 2020
MHCLG and Homes England.			"good growth".
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	No further meetings
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	Ongoing
Working with PAS on the Council's Action Plan and participating in the Action plan workshops	Completed	Strategic Planning Team PAS	Thanet identified as a good case study in PAS guidance 2020
Empty Homes programme - bringing empty homes back into use	Ongoing Regular monitoring as part of the AMR since 2016	Private Sector Housing team Strategic Planning Team	
Establish a housing company Short / Medium term	Target to start trading by April 2020	Housing Strategy & Projects Manager	

Potential Future Initiatives

Potential Action	Timescale	Team Lead
Appoint a Development Implementation Officer	Short term	Housing Strategy & Projects Manager
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
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 adoption of the Local Plan this summer 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 the development industry on specific sites in connection with the annual Housing Information Audit. However, the situation has been difficult this year with the lockdown imposed due to the Covid-19 pandemic.

5.2 Further consultation on housing delivery and market perception will be undertaken by GL Hearn on behalf of the Council in early 2021 to inform the Local Plan Review.

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.