

ASHFORD
BOROUGH COUNCIL

Housing Delivery Action Plan

June 2021

1) INTRODUCTION

The National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) set out the need to complete a Housing Delivery Test (HDT). This test measures the number of homes required (as prescribed by Government) over a three-year period against the number of homes delivered and calculates the result as a percentage.

This updated HDT covers the monitoring years for Ashford borough from 2017/18 to 2019/20 and the results were published in January 2021.

Ashford scored an HDT result of **90%**

Delivery performance of less than 95% requires a Housing Delivery Action Plan (HDAP) to be prepared and the application of a 5% buffer to our 5-year housing land supply figure.

The HDAP explores the reasons for under-delivery and establishes actions to reduce the risk of under-delivery getting worse and sets out the measures the Council intends to take to rectify the position.

This HDAP is intended to be a practical document, focussed on effective measures aimed at improving delivery within an area underpinned by local evidence and research of key issues. This HDAP updates the Council's first HDAP, which was published in June 2020.

2) HOUSING DELIVERY IN ASHFORD

The Council have long recognised the importance of housing delivery in terms of the social and economic benefits it brings. This delivery has been consistently shaped by a range of Local Plans that have provided a clear plan-led approach to help steer and shape the market.

This focus continues. The Council's Local Plan 2030 was adopted as recently as 2019. It provides a comprehensive planning policy framework to deliver sustainable housing growth in the borough.

However, it is not about delivering housing above all else. The Council have always placed great importance on the quality of the places that are to be delivered, including how communities will grow and flourish and ensuring that they are supported by infrastructure.

That said, the Council also recognise that it is the development industry and housebuilders who directly impact how many houses are built. This needs to be understood when looking at housing delivery.

The housing market is sensitive to market forces and fluctuations, such as the local and national economic situation and other influences. The ongoing COVID-19 pandemic highlights this fact. As does the previous 2008 market crash and national recession. This clearly restricted public spending on projects and the market's ability to deliver houses, for several years, on a national scale.

Therefore, it is accepted that the rate of housing delivery in the borough will fluctuate over various cycles, despite the Council providing a robust, sound and positively prepared policy framework to help shape its delivery and this framework being up to date.

The most recent Housing Delivery Test result of 90% demonstrates how the market can fluctuate and we welcome the opportunity to revisit this Action Plan.

3) TAKING STOCK

This section of the Action Plan provides a snapshot of various issues that relate to the local housing market and its ability to deliver housing.

It should be noted however, that Government guidance suggests that engagement with stakeholders is required to understand the nature of the housing market and identify any barriers to housing delivery. However, due to the ongoing COVID-19 pandemic, some of this engagement has had to be curtailed. It will be undertaken when circumstances permit.

This is countered somewhat by the fact that the Council recently undertook extensive preparation to support the Local Plan 2030 which was adopted in Feb 2019. This process involved significant engagement with the local housing market, including developers and land agents.

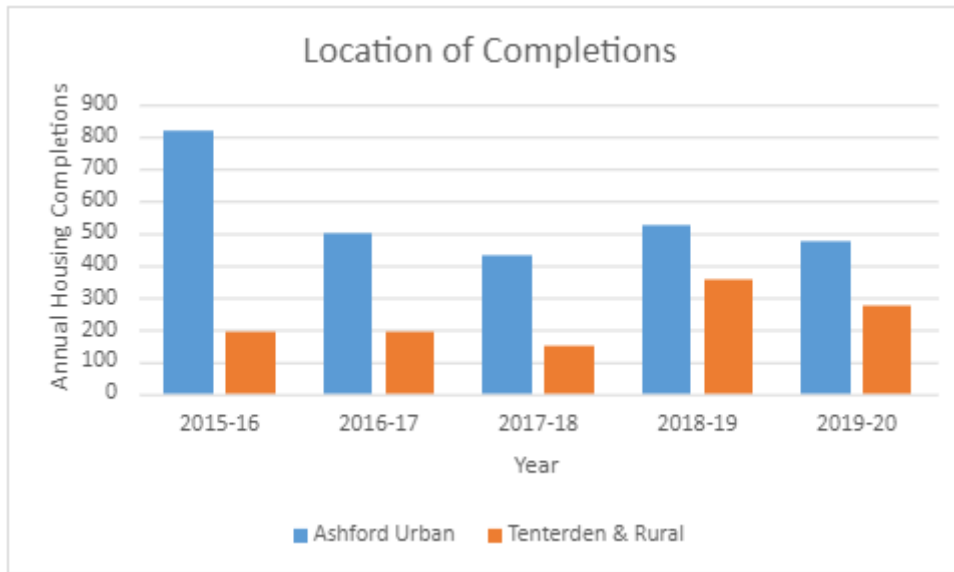
1) HOUSING DELIVERY AND PLANNING DATA

Housing completions: In the past 10 years 5,935 dwellings have been completed in the borough.

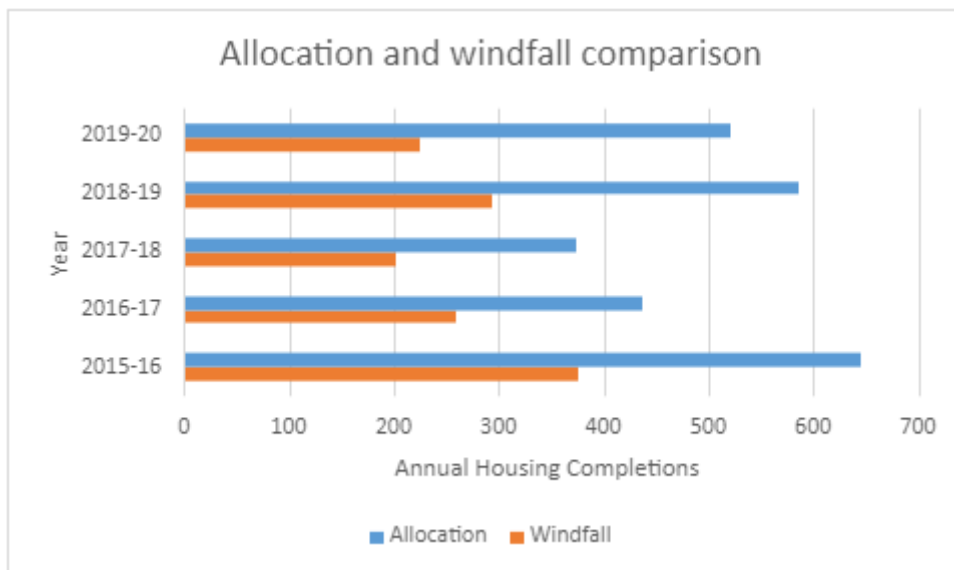
Year	Housing completions
2009/2010	501
2010/2011	555
2011/2012	633
2012/2013	284
2013/2014	137
2014/2015	405
2015/2016	1022
2016/2017	696
2017/2018	577
2018/2019	880
2019/2020	746



Location of completions



Allocation vs Windfall comparison



Number of dwellings granted over the last 5 years



(Note: this does not include the 12/00400/AS Chilmington Green application for 5,750 homes granted permission in 2016-2017)

Five year housing land supply: The Housing Land Supply Calculation set out in the update for 2020-2025, as of 31 July 2020, shows that the Council is able to demonstrate a housing land supply of 4.80 years, including a 5% buffer. Further details can be found in the Council's AMR¹ and the [Five Year Housing Land Supply Update Report](#)².

2) THE NATURE OF THE LOCAL HOUSING MARKET

Active operators: There are a range of operators active in the housing market within the borough, ranging from national house builders to smaller more local ones. This mix brings diversity to the local housing market and makes it more resilient.

Mix of housing sites: The housing strategy adopted in the Local Plan 2030 recognised the demand from the market for a variety of housing products in the borough. This responds to people's various needs, but also the desire to make the local housing market as diverse as possible – again with resilience in mind.

In doing so, the Local Plan 2030 allocated sites that provided a range of choice and competition to the market, thus providing the greatest chance that housing will be consistently delivered over the whole plan period. Some key examples are as follows:

¹ Ashford Borough Council's 2019/2020 AMR available at: <https://www.ashford.gov.uk/authority-monitoring-reports/>

² Five Year Housing Land Supply Update 2020-2025

- ***Flatted development in the traditional Town Centre:*** Over recent years there has been clear market demand to deliver flatted accommodation in the traditional town centre area, utilising HS1 with its excellent and frequent connections to London.

Many of these flats are now under construction. However, as this has been a new housing product for the Town it has taken longer than perhaps anticipated for the market to deliver them. This is to be expected, and market confidence remains sensitive.

However, a balanced view needs to be taken. These sites are now coming forward and they have the ability to deliver large numbers of new housing in the short to medium term, in what are highly sustainable brownfield locations within the urban area – an area which is well supported by existing infrastructure and infrastructure that is planned to be delivered.

- ***Chilmington Green and the South of Ashford Garden Community:*** Chilmington Green is another type of housing product within the borough. It is planned to be a sustainable urban community that will deliver 5,750 homes, over 1,000 jobs, five schools and associated infrastructure. The scheme is underpinned by many of the Garden City principles. The emerging developments being planned at Court Lodge and Kingsnorth Green will further extend this sustainable urban community.

However, delivering such a large development has taken time. This experience is not limited to Chilmington Green – many large-scale developments across the country face similar problems when moving from the planning phase to the delivery phase.

Issues such as securing financial agreements, establishing robust cash flow models, land assembly and getting certainty over the delivery of needed infrastructure has all resulted in significant lead in times and subsequently delayed housing delivery from what was originally planned.

Housing completions are now coming forward at Chilmington Green. There is little doubt that this scheme can deliver substantial levels of new houses in the short, medium and longer term in a sustainable location which has a robust policy framework supporting delivery.

- ***Sites in the rural areas:*** The Borough has an extensive rural area. Most of this area is countryside, including two internationally protected sites, two nature reserves, 13 SSSIs and 68 Local Wildlife sites. A significant proportion of the countryside falls within two Areas of Outstanding Natural Beauty.
- This context was recognised in the recent Local Plan 2030 in terms of housing sites. The strategy is to target appropriate levels of housing growth to different rural settlements based on their relative sustainability whilst

also protecting the attractive characteristics of the countryside and existing rural settlements.

- As such, a broad and varied range of rural residential site allocations were identified in the Local Plan 2030 to provide the local housing market with choice. Most of these rural site allocations were phased to be delivered early in the plan process, to assist housing supply in the short to medium term.
- The approach to housing in the rural area remains a balanced one – a scale of development is proposed which can be sustainably accommodated. This reflects the local circumstances and remains appropriate. This position has recently been supported by two independently appointed Planning Inspectors, as part of the Local Plan 2030.

3) INFRASTRUCTURE ISSUES

The Council has a strong record of working with public stakeholders and partners, as well as developers, to ensure that new development is served by new or existing infrastructure that is needed to support the additional demands created by new housing developments.

Recent successes include improvements of Junction 9 and Junction 10 of the M20. In addition, a new Junction 10a has recently opened which provides greater capacity. Also, upgrades have been recently delivered at Bybrook Wastewater Treatment works to increase its capacity.

However, infrastructure issues remain. These include issues associated with the wider A28 corridor to the south west of Ashford. Discussions on this are progressing.

The Council continue to engage in discussions with key stakeholders through various channels, including:

- ***South East Local Enterprise Partnership (SELEP):*** The SELEP is the key body determining strategic economic priorities and investments for the area which includes East Sussex, Essex, Kent, Medway, Southend and Thurrock. The Borough has already benefitted from significant funding for projects through the SELEP Growth Plan and Local Growth Fund, including major contributions towards M20 Junction 10a, Chart Road and Ashford College.
- ***Ashford Strategic Delivery Board:*** The Board comprises Ashford Borough Council and other key public sector partners including Kent County Council, Homes England, Skills Funding Agency, Arts Council England, the Highways Agency and Ashford College. The local Member of Parliament is also a Board member and the Board has a good track record in helping to get projects delivered and funded.

- ***Kent County Council:*** The Borough and County Councils have already achieved a lot by working together on projects over recent years. This approach is reflected in the ‘District Deal’ signed by both Councils - a formally agreed statement of the Councils’ shared commitment to work together in key areas. This is the first such agreement in Kent. A District Deal board oversees delivery of the agreed projects.
- ***Chilmington Green Delivery and Implementation Board:*** The “Chilmington Together Delivery and Implementation Board” is a public / private partnership made up of representatives from nine organisations to facilitate, nurture and sustain long-term value-creating relationships through the delivery of the Chilmington Green development. Reporting on a quarterly basis to the Ashford Strategic Delivery Board (ASDB), the DIB sets out actions on a rolling 12-month delivery plan, identifies and secures public / private sector investment to the project, and champions a placemaking approach to the new community of Chilmington Green. The Board monitors risks and milestones to delivery to support collaborative resolution to issues.

4) **STODMARSH LAKES**

In July 2020, Natural England issued advice to Local Planning Authorities in the Stour Catchment regarding the deteriorating water quality in the Stodmarsh Lakes. As a result of their advice, which was updated in November 2020, all development proposals resulting in a net gain of population through the provision of overnight accommodation are required to demonstrate nutrient neutrality. More information about this process is available at: <https://www.ashford.gov.uk/habitat-regulations-assessment>

This issue may impact housing delivery on sites located within the Stour catchment within the borough. Work is currently ongoing to resolve this issue through the preparation of a Mitigation Strategy.

4) THE ACTION PLAN

<u>Theme 1 – Understanding the Barriers to Delivery</u>				
Action	Purpose	Timing	Priority	2021 Update
Assess relevant planning data	Assess the available data to determine whether some planning consents aren't being implemented and whether any trends arise – are certain site typologies or locations presenting issues more than others, and if so, map a way forward.	Short term	High	Sample of extant planning permissions to be probed with a view to undertaking qualitative analysis of reasons why some planning consents remain unimplemented.
Market feedback	Pro-actively contact landowners/site owners where applications have been granted for a time, and not yet commenced. And, pro-actively contact landowners/site owners where applications have not been submitted on sites allocated in either the Local Plan 2030 or adopted Neighbourhood Plans. On sites currently under construction, pro-actively contact landowners/site owners to gather data on the anticipated build-out rates.	Short term	High	<p>Linked to above.</p> <p>Cross reference extant planning permissions with Building Regulations data to clarify whether schemes have commenced.</p> <p>Audit recently submitted applications on allocated sites, for example S8 and S62. Contact Planning Officers (and landowners as necessary) for updates.</p> <p>List allocated sites where applications have not been submitted, and contact sample of owners / agents to understand reasons for lack of progress.</p>
Developer/ Land Agent workshop	Set up a general stakeholder working group to include developers and land agents as a means of discussing emerging issues to delivery with local stakeholders (ideally every six months)	Short term	High	Second (virtual) workshop imminent (end of April) - Stodmarsh focussed.
Establish better working practices	Progress a more collaborative approach with all delivery partners to understand what barriers might exist and what is needed to unlock delivery	Medium / Longer term	Medium	Ongoing.

Theme 2 – The Planning Process

Action	Purpose	Timing	Priority	
S106 process	To review the S106 process to see whether it is fit for purpose and as efficient as possible. To include liaison with key partners.	Short term	High	Commenced and ongoing. Review commenced of current (2001) Supplementary Planning Guidance on Developer Contributions / Planning Obligations.
Review Planning Committee data	Review planning committee data to see if any trends emerge.	Medium term	Medium	Reasons for planning application deferral and / or refusal against officer recommendation to be reviewed and summarised, with a view to identifying any trends. In light of this review, opportunities to be identified to improve processes with the objective of improving outcomes. Possible focus on engagement with members prior to committee.
PAS review implementation	To implement the PAS review where it relates to improving planning performance.	Short term	High	Ongoing.
Planning Performance Agreements	To review the use of Planning Performance Agreements when staffing levels return to a suitable level.	Medium term	Medium	Resources have not yet allowed for this, but it remains under review.
To review planning application process.	To review the wider planning application process, ranging from pre-commencement conditions, the role of pre-app advice, on-going case management and the service we provide to customers.	Short term	High	Staff resources and the reorganisation have not yet allowed for this to be progressed, but it remains under review.
Planning application prioritisation	To review whether certain types of planning applications need to be prioritised above others.	Medium term	Medium	Under ongoing review where cases are being actively managed to ensure that a decision is reached as soon as possible or that the application has been progressed as far as it can be and subsequently held in relation to Stodmarsh.

<u>Theme 3 – Infrastructure Delivery</u>				
Action	Purpose	Timing	Priority	
Engagement with key partners	Continue to work proactively with key partners and stakeholders in relation to the delivery of key infrastructure.	Ongoing	High	Review commenced of current (2001) Supplementary Planning Guidance on Developer Contributions / Planning Obligations. Parallel review of Infrastructure Delivery Plan commenced.
Funding opportunities	Continue to actively review and pursue relevant funding from Government in order to unlock key developments and support our partners' aspirations.	Ongoing	High	Ongoing.
<u>Theme 4 – Maintain a Plan Led Approach</u>				
Action	Purpose	Timing	Priority	
Local Plan	Continue to adopt a comprehensive plan led system through assisting in the implementation of the recent Local Plan 2030.	Ongoing	High	Local Plan 2030 subject to impending review.
Neighbourhood Plans	Continue to provide appropriate levels of support and advice to bodies engaged in Neighbourhood Plans and ensure that their objectives are clear regarding housing delivery.	Ongoing	Medium	Ongoing.
Monitoring data	Establish better practices for the monitoring of housing data, including housing completions so that we are more aware of the issues in a timely way so we can map a response quicker.	Medium	High	Ongoing, and closely related to the above referenced review of the S106 process. Next regular housing completions monitoring cycle due to commence May / June 2021
Brownfield Register	Use the brownfield register to grant permission in principle.	Medium	Medium	Under ongoing review. Twenty nine sites are currently identified in Part 1 of Ashford's Brownfield Register. No sites have yet been included in Part 2, meaning that they are considered to be suitable for a grant of Permission in Principle for residential-led development.
Local Plan Review	Trigger a Local Plan review if needed and if considered to be a suitable response to emerging issues. Work to include a 'call for sites exercise', reviewing housing and economic land availability assessments and potential revisions to existing policies/ introduction of new ones.	Longer term	Low to Medium (at this point)	Local Plan 2030 subject to impending review but cannot progress significantly until Stodmarsh issue substantially addressed and direction emerging from Planning White Paper is clearer. Potential Stodmarsh implications need to be kept under ongoing review.

5) MONITORING AND REVIEW

The actions from the HDAP will be implemented in due course and then monitored. This will allow the Council to better understand any root causes of under delivery. If considered to be useful, the Action Plan will updated again next year, highlighting if further actions (including new actions) are needed.