



Royal Borough of Kensington and Chelsea Housing Delivery Test - Action Plan

November 2018



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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1. Introduction

Why housing delivery is important

- 1.1 The Government's Housing White Paper makes it clear that the housing market in the UK is broken. The cause, it concludes, is very simple: for too long, we haven't built enough homes. Tackling the housing crisis means planning for the right homes in the right places. It requires a significant boost in the number of homes built and an increase in the speed at which they come forward.
- 1.2 Although the Royal Borough of Kensington and Chelsea (the Council) has granted permission for enough houses to meet our housing targets, the number of homes that actually get built in Kensington and Chelsea has fallen short of the housing targets set for the Council. This Action Plan has been prepared to set out how the Council is responding to the challenge of building more homes faster. It sets out the challenges we face and the actions we propose to take to address housing delivery.
- 1.3 The Action Plan works in conjunction with the Local Plan Partial Review (LPPR), which has been the subject of examination. The Inspector's Report on the 'soundness' of the LPPRI is due imminently. Assuming the LPPR is found to be 'sound' it can be adopted by the Council in the winter of 2018. The LPPR sets out a strategy for boosting housing delivery and it allocated new sites to bring forward new residential development.

What are the consequences if developers in Kensington and Chelsea do not build enough homes?

- 1.4 The National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG) introduces the 'Housing Delivery Test' (HDT) in a phased approach over three years. Once fully implemented the HDT will have the following consequences:
 - The publication of an action plan if housing delivery falls below 95% of a local planning authority's adopted housing requirement over the previous three years;
 - A 20% buffer on a local planning authority's five-year land supply if housing delivery falls below 85% of the adopted housing requirement (this in effect would require the Council to find additional sites for an additional 20% of the housing requirement); and
 - The 'presumption in favour of sustainable development' in the NPPF would apply automatically if housing delivery falls below 75% of the adopted housing requirement, once transitional arrangements have ended in November 2020. (It should also be noted that the presumption will apply if

housing delivery falls below 25% of the housing requirement in November 2018 and 45% of the housing requirement in November 2019).

- 1.5 The ultimate sanction of the presumption in favour of sustainable development introduces a test, which has become known in legal cases as ‘the tilted balance,’ in favour of granting permission for housing development. This test states that permission should be granted unless: (i) policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or (ii) where any adverse impacts of approving the development proposed would significantly and demonstrably outweigh the benefits.
- 1.6 In this scenario, it is likely that the Council will come under pressure to approve inappropriate development (i.e. development conflicting with adopted policies of the Development Plan) as developers seek to rely on the titled balance arguments in favour of housing delivery. This may lead to an increase in planning appeals as adopted policies of the Development Plan are tested against the presumption in favour of sustainable development. The worst case scenario for the Council would be the loss of vitally important lower value uses such as offices, shops, hotels, pubs, restaurants and community uses to residential development.
- 1.7 The more general and obvious consequence of a failure to build in Kensington and Chelsea is fewer homes are built to meet demand and need, which exacerbates the unaffordability of homes. Fewer new market homes also mean fewer new affordable homes. This is because building new market housing funds the construction of affordable homes for those on lower and middle incomes.

What is the purpose of this Document?

- 1.8 There is no requirement to produce an action plan at this stage. Whilst the HDT will be published this month, the Government allows for a further six months for local authorities to produce an action plan where it is required. Given the transitional arrangements, Kensington and Chelsea are likely to perform well against the HDT initially. We therefore do not need to produce an action plan at this stage. In doing so we are seeking proactively to address housing delivery and boost the number of homes built in the borough.
- 1.9 This Action Plan is the Council’s response to the challenge set out in the Government’s National Planning Policy Framework to boost significantly the supply of homes and has five goals:
 - To set out the historic performance on housing delivery in Kensington and Chelsea.

- To explain what the Council has been doing so far to boost housing delivery.
- To gather evidence on sites with planning permission (and sites allocated for housing development) to understand what barriers are preventing homes being built on these sites.
- To build relationships with developers, landowners and agents responsible for building homes on sites that have planning permission, allowing the Council to adopt the role of an enabler of much needed residential development ensuring it is built out as quickly as possible.
- To set out what actions the Council can take to increase the rate and number of homes built in Kensington and Chelsea.

2. Past Performance on Housing Delivery

How many homes have been built in Kensington and Chelsea?

- 2.1 The number of homes built in Kensington and Chelsea over the last decade has fallen short of the Borough's adopted housing targets. The Council's housing targets are set by the London Plan and are derived from an assessment of the Council's capacity to deliver additional housing (i.e the developable land available).
- 2.2 Since the production of the Council's Core Strategy in 2010, the Council has granted permission to build 5,193 homes against a target of 4,216 homes. However, the number of homes that have actually been built in that time is 2,119 or 54% of the Council's target.
- 2.3 This shortfall means that since 2010 there have been 2000 fewer homes built in the Borough than required by our housing targets and approximately 3000 fewer homes than have been granted. The issue is therefore less about the permissiveness of the planning system and more about issues that occur after planning permission is granted or, to a lesser extent, issues that prevent sites ever coming forward in the first place.

Table 1: Housing Approvals and Completions Vs Housing Targets RBKC 2010-2017350

	10/11	11/12	12/13	13/14	14/15	15/16	16/17	Total
Housing supply target	350	600	600	600	600	733	733	4216

New residential approvals**	783	860	244	1292	1303	252	459	5193
Net residential completions	175	102	65	264	982	341	190	2119

What have we done so far to ensure more homes are built?

2.4 The Council has already taken a number of steps to boost the delivery of homes, summarised as:

Progressing a Local Plan Partial Review with additional site allocations and new planning policies that will boost housing delivery and ensure the right sizes, types and tenure of homes are built.

2.5 Policies boosting housing delivery include:

- New site allocations in the Local Plan. The Council has identified sites capable of delivering a minimum of 150 new homes on land suitable for housing development. These sites are land at Lots Road, Harrington Road and Chelsea Farmers' Market.
- New affordable housing policies, which incentivise the delivery of a minimum of 35% affordable homes by reducing the need to submit a viability assessment for developments meeting this target, in line with the Mayor of London's 'Threshold Approach'. This policy seeks to boost the amount of affordable housing built in Kensington and Chelsea and helps speed up decision making while reducing the cost and burden of evidence required from developers providing 35% affordable housing.
- Amendments to the Employment Zone policy allowing some residential uses in certain circumstances.
- A new stricter policy to limit the loss of homes through the amalgamation of properties.
- Amending the housing policies to ensure that sites optimise the number of homes delivered.

Setting up a Planning Implementation Team

- This team has been set up partly to identify issues and barriers to housing delivery. The team addresses these issues by working closely with developers, landowners, the GLA and other departments in the Council to improve housing delivery and work to bring sites forward for development.

Efficient Decision Taking

- The data on deciding planning applications shows that the Council functions efficiently. This has been confirmed by the general feedback from agents and developers. Last year, 98% of applications were registered, validated and public consultation commenced within five days. We decided 97% of major applications within 13 weeks, and 86% of minors and 84% of “others” were decided within 8 weeks. The speed of decision making is therefore very good and delays in the system are minimal.

Reducing uncertainty and minimising risk for developers

- The Planning Department enters proactively into pre-planning application discussions with developers on almost all large sites within Kensington and Chelsea. This significantly reduces uncertainty for developers and lowers the initial cost of exploring development options.
- Where the Council believes there is a good prospect of development proposals gaining planning permission, we will enter into a Planning Performance Agreement (PPA) with the developer on large schemes to provide bespoke services to guide the proposed development through all stages of the planning system. This process sets out a timetable for decision making and ensures sufficient resources are allocated. Both PPAs and advice processes significantly reduce risk and support the delivery of housing development in the borough.
- The Council has also produces site specific Supplementary Planning Documents and planning briefs that help to guide developers towards proposals that would be granted planning permission. This further reduces the uncertainty for developers in bring forward proposals for housing development.

Good Communication with Landowners, Developers and Agents

- The Council has set up an Agents’ and Developers’ Forum, which meets regularly to share important information and to get feedback from those building homes in the Borough. This provides a forum for the identification of problems affecting housing delivery.

Lowering burdens for developers

- The Planning Department has set in place a review mechanism to scrutinise the conditions applied to planning permissions before they are granted by the Council. This review ensures that unnecessary burdens are not placed on development proposals.
- The conditions review has also considered the trigger points for discharging these conditions. This has led to a particular focus on reducing the number of conditions that must be dealt with prior to development commencing.

- The wording of the standard conditions that are applied to permissions has also been reviewed to ensure that the conditions are necessary, relevant, enforceable, precise and reasonable in all cases.

3. Sites Monitoring

How we have gathered information on sites and engaged with stakeholders?

- 3.1 The Council has undertaken the following actions to gather evidence on housing delivery.
- Conducted a housing completions survey (in May – June 2018).
 - Written letters to agents on sites delivering 5+ net dwellings in the pipeline of sites with planning permission. (see Appendix 1).
 - Set up meetings with agents representing numerous sites in Kensington and Chelsea.
 - Presented to the Agents' and Developers' Forum.
 - Gathered evidence from Development Management Team Leaders.
 - Reviewed s106 payments and trigger points.

Which sites have we contacted?

- 3.2 The assessment of future housing delivery has focussed on the larger sites with permission for five or more additional homes. This has meant concentrating on roughly the 50 largest sites in our permissioned pipeline capable of delivering the majority of the homes granted. This approach spreads the net wide enough to capture any issues that are affecting delivery on smaller sites as well as site allocations. The pipeline of sites was taken from last year's sites list and therefore sites that have been granted planning permission in the last six months are not included.
- 3.3 Another subsection of sites which have been assessed are those that have been allocated for housing within the Council's Development Plan (either through the Local Plan or an adopted Neighbourhood Plan). Some of these sites have planning permission whilst others do not. If these sites were to come forward quicker this may help to address the shortfall in housing delivery.

Assessing future development sites

- 3.4 The pipeline sites fall into three categories using a traffic light system green, amber and red

Green Sites

- 3.5 The first group of 'green' sites are those sites that are currently progressing towards completions with little or no delays or barriers identified. Green sites have cleared post-application conditions and have begun (or are due to begin) construction with no obvious barriers to completion.

Amber Sites

- 3.6 A second group of 'amber' sites are those where there is some evidence of potential delays / barriers that could inhibit delivery in the immediate or short term. Sites where the Council has not been able to collect enough evidence to make a judgement on delivery have also been categorised as amber. Issues that may push a site into an amber categorisation might include;
- where it is likely that an applicant wishes to amend their scheme.
 - where the owner wishes to sell the site.
 - where further finance is required to deliver the site.
 - where the site is dependent on other developments coming forward.
- 3.7 The amber sites have a clear delivery path with developers committed to bringing forward housing at their sites in negotiation with Development Management colleagues.

Red Sites / Stalled Sites

- 3.8 A red site is one which has planning permission for housing but there is no prospect of development occurring without more active intervention. These sites have essentially stalled.
- 3.9 These sites have stubbornly failed to progress despite promotion by the Council through an allocation in the Local Plan or have ground to a halt after planning permission has been granted and/or implemented.
- 3.10 Such sites are materially different from other sites in the pipeline facing obstacles or delays. Large sites with long lead in times and complex constraints may take time to deliver. However, there is a will amongst the landowners, developers and the Council to seek solutions to eventually bring these sites forward. Site promoters actively engaging with the Council to bring forward sites do not fall under the definition of a stalled site.

4. Barriers to Housing Delivery

Barriers / Issues Identified

Commercial Factors

- 4.1 The strength of the local housing market in Kensington and Chelsea impacts on a developer's decision to invest in property and bring forward new housing. There are a number of factors that have impacted prices at the prime end of the London Housing Market. These include:
- Uncertainty around Brexit
 - Increases in stamp duty
- 4.2 The relative value of different land uses clearly has a bearing on the attractiveness of residential development. The fluctuations between land uses and their values change over time. For example, office values in Kensington and Chelsea in the 1980s exceeded residential values and the pressure at that time was towards commercial uses.
- 4.3 The high residential values in the Borough in recent years has led to powerful financial incentives to seek conversions to residential use from lower value uses such as hotels, shops, offices and community uses.
- 4.4 Anecdotal evidence collected from planning agents as part of the site survey suggests that economic trends may be shifting towards a scenario where commercial uses are competing with residential uses in terms of profitability.
- 4.5 Such anecdotal evidence is backed up by evidence from the Council's pipeline sites and pre-application discussions. For example, the developers of the Saga Centre gained permission for a mixed use scheme of office and residential but later sought a revised commercial only scheme. There are other examples of schemes in early stages of discussions with the Council that show similar trends. It is unclear at this moment whether this trend is limited to particular areas of the borough or particular types of scheme.

Lack of available land / sites

- 4.6 We have a shortage of available development land in Kensington and Chelsea. There are only a small number of sites capable of delivering significant amounts of additional housing and we must make sure that where opportunities exist to deliver housing, we take them. There is little scope to alter the mix of sites allocated or increase the amount of land earmarked for development where delivery falls below our targets without defeating other objectives of the Local Plan, such as supporting the local economy. The Council's housing

targets are derived from the amount of land that can be developed (i.e. the capacity for new homes) rather than from an assessment of the need.

- 4.7 The lack of available land means we must work hard to bring forward housing development on the few sites we do have. This means taking difficult decisions to get difficult sites moving and being proactive in searching for additional windfall opportunities including options for more mixed use development. Delivery of the Opportunity Areas, namely Earl's Court and Kensal Canalside Opportunity Area, are very important to our future housing delivery and these sites should be prioritised and resources brought to bear to unblock any identified barriers. The Council can also bring forward our own sites with public consultation and engagement with a greater certainty of delivery.

Preserving the historic built environment and Kensington and Chelsea's sense of place

- 4.8 Kensington and Chelsea is characterised by a finely grained historic street pattern with an outstanding building stock of Georgian and Victorian town houses and Edwardian mansions blocks. Over 70 per cent of the borough is designated a conservation area and there are over 4000 listed buildings. With the exception of a few clusters of tall buildings, the majority of the borough has a relatively homogenous and level roofscape. The primary character of the borough is residential with some well-defined town centres and supporting offices uses.
- 4.9 There are relatively consistent building heights ranging from 2-3 storey terraces in North Kensington and Lots Road to 5 storey Georgian and Victorian terraces and townhouses with pockets of up to 8 storey Victorian and Edwardian and 1930s mansion blocks. Opportunities for significant intensification of existing sites are therefore limited.

Site Specific Issues

- 4.10 There are a variety of issues which effect specific sites causing slower rates of homebuilding. These include:
- High infrastructure costs
 - Complex landownership with multiple land parcels
 - Viability and planning obligations
 - Infrastructure safeguarding (e.g. Crossrail 2)
 - Site relies on other developments to come forward
 - Heritage constraints (conservation areas, listed buildings and registered parks and gardens)
 - Land contamination
 - Access to/from the site
 - Legal issues (e.g. lease arrangements, covenants, rights to light)

Landowner / Developers' Circumstances

4.11 Individual circumstances of the landowners and developers impact the speed at which sites get built out. Issues that create barriers to homes being built are:

- Business model of the landowner – whether or not they intend to build themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission.
- Access to finance and cost of interest payments.
- Land value expectations.
- Extent of the freeholder / leaseholder motivation to develop the site.

S106 Contributions and Viability Concerns

4.12 The delivery of expensive infrastructure and affordable housing contributions impact upon the viability and deliverability of schemes within the borough. The previous adopted policies in the Local Plan sought 50% affordable housing by floorspace. Very few schemes met this threshold and therefore most applications relied upon demonstrating that the “maximum reasonable amount” of affordable housing was being provided. This is done by the submission of viability assessments, which are then scrutinised by independent experts on behalf of the Council.

4.13 The scrutiny of viability assessments is a vital aspect of the development management process as it has such important implications for the delivery of affordable housing and other public benefits.

4.14 The evidence gathered suggests that the Council’s approach in seeking to address viability at the pre-application stage is welcomed and beneficial in speeding up of the formal consideration of the application later on. The following suggestions were made to improve the speed of consideration:

- The Council should emphasise speed as well as quality in procuring viability consultancy services.
- Allow experts from developers and those representing the Council to meet and agree inputs, which will in turn speed up the negotiation time.

5. Future Actions

5.1 The Council is looking at a range of actions to boost housing delivery in Kensington and Chelsea. The following actions can help to stimulate the delivery of housing in the Borough.

1. Explore options to build more affordable homes on land in Council ownership, whilst minimising impact on existing communities

5.2 The Council is a significant land owner in the borough. Developing our own land holdings provides an opportunity to bring forward more affordable homes without the need to rely on third party developers.

5.3 Exploration of how the Council might build more homes, especially affordable homes, on Council land is at a very early stage of development. The Council published a discussion paper, *Kensington and Chelsea Homes: Solving the challenge together*¹ to initiate a conversation with residents, local stakeholders and other interested parties on the Council's role in housing delivery as part of a wider housing strategy for the Borough.

5.4 The Council was clear in its stated commitment to stopping the estate regeneration schemes, which were moving forward when the Grenfell tragedy happened. The discussion paper sets out options for infill sites with the potential to deliver new homes without the loss of existing homes. Such an approach would require securing funding to build the homes. Therefore, the Council would have to work closely with possible funding partners such as Greater London Authority and Homes England. The proposals would include market housing that would help to fund the delivery of additional affordable housing at these sites.

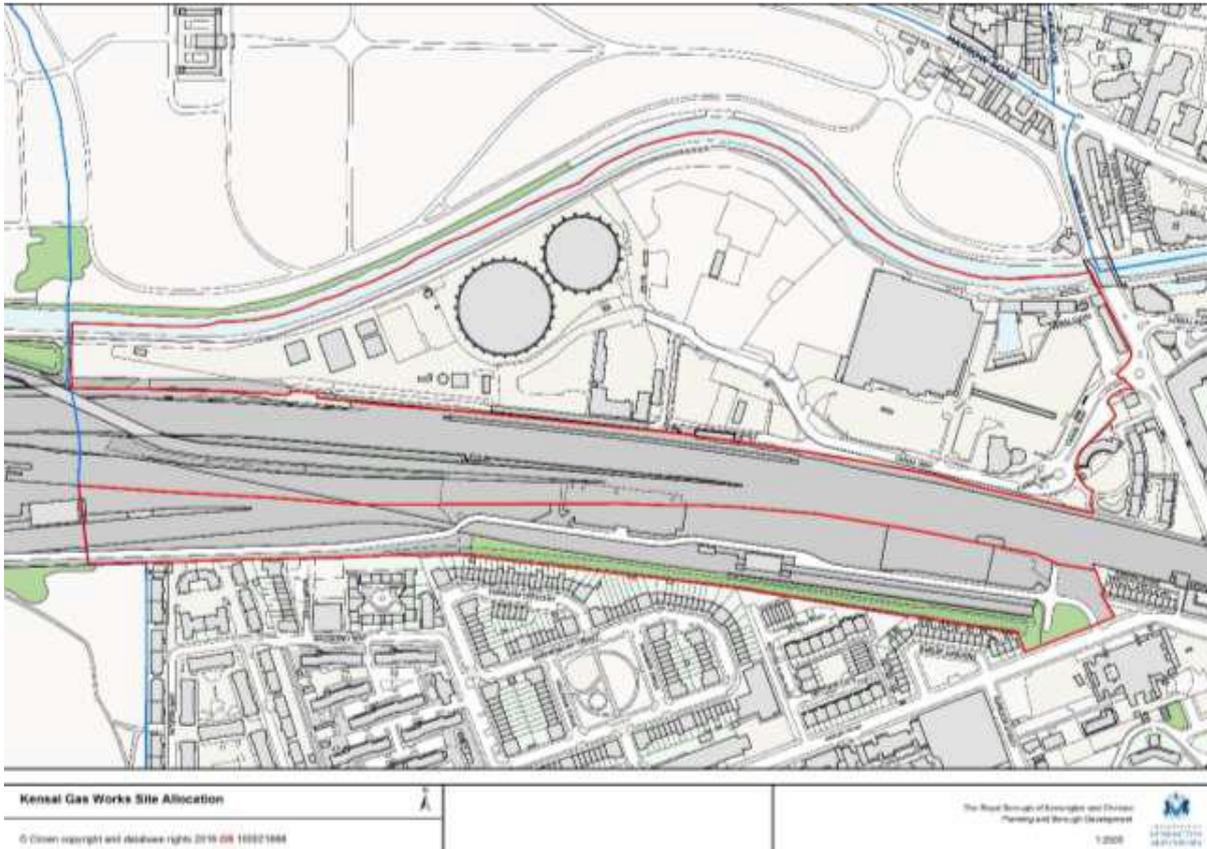
5.5 Any approach would be geared to minimise the potential impact on existing communities and will be subject to extensive public consultation and engagement before any strategy is agreed and pursued.

Actions

- **Identify scope for building more affordable homes on Council land while minimising impact to existing communities.**
- **Identify funding options for delivering more affordable homes.**
- **Widely consult residents, local stakeholders and other interested parties on any possible options.**

¹ RBKC, [Kensington and Chelsea Homes: Solving the challenge together](#), (18 October 2018)

2. Prioritise the delivery of key sites such as Kensal Canalside Opportunity Area (OA)



- 5.6 Kensal Canalside OA is the last remaining undeveloped site in the borough. The site has been allocated for a minimum of 3500 homes, which represents nearly five years of future supply in the borough. The site will make by far the largest contribution to future housing supply in Kensington and Chelsea. The site does not have an existing planning permission.
- 5.7 The Council consulted on an Issues and Options paper in 2012 and progress has been made since in addressing some historic barriers, including the revocation of a Hazardous Substances Consent, which acted as an effective inhibitor of any development coming forward on much of the site.
- 5.8 The Council is proactively driving forward this project and pushing an ambitious timetable to reduce the time taken to begin to get homes built on site. To this end a Kensal Delivery Team who have design and planning skills has been set up to manage the project. Speeding up delivery at Kensal Canalside can go a long way in closing the gap between the number of houses built and the nominal housing target for the borough.

Barriers to delivery

5.9 However, there are a number of barriers to bringing this site forward for homes. These include:

- Uncertainty over whether the site will have a Crossrail Station.
- Multiple landowners with differing interests
- High cost of required infrastructure and need to fund this upfront
- Large site with long lead in times
- Land contamination
- Poor accessibility of the site

Actions

- **Set up a Kensal Delivery Team (4 officers) to progress the delivery of the site (completed).**
- **Produce an SPD to set out the what, where, when and how. This will reduce uncertainty for landowners and speed up development at the site.**
- **Enter into a PPA agreement with the landowners**
- **Set up a steering group**
- **Set out a timetable for pre-application discussions.**

3. Tackle the Borough's stalled housing sites

5.10 In keeping the development pipeline under review the Council will identify any sites that are 'stalled' as red. These sites will be considered and reported to members as necessary. Where the Council considers they have the power to influence the delivery of these sites, we will work proactively with developers, landowners and agents to bring forward development to deliver the homes we need.

Actions

- **Development Management Area Teams and the Planning Implementation Teams to seek to address any issues/barriers raised by agents. Future actions to be included in an update to this Action Plan.**
- **Where appropriate produce Options papers to unblock identified stalled sites in Kensington and Chelsea to be presented to the Leadership Group or Planning Committee.**

4. Conduct a Borough wide survey of possible development sites and actively promote any suitable for housing

- 5.11 The identification of potential development sites is addressed through a number of processes already undertaken within the Council. When the Council started the process for the Local Plan Partial Review (LPPR) a 'Call for Sites' was undertaken where landowners and developers were invited to submit land or buildings with development potential. A small number of sites were submitted to the Council and considered as part of the LPPR.
- 5.12 The Greater London Authority (GLA) also undertakes a Strategic Housing Land Availability Assessment (SHLAA) process in conjunction with London boroughs to identify possible development sites. As part of this work a further 'call for sites' was undertaken by the GLA. This study of land capacity assesses possible development sites across London and forms the basis of the housing targets set out in the London Plan. The latest SHLAA was undertaken last year.
- 5.13 The market is efficient at identifying potential development sites in the borough due to the extremely high land values. The scope for unidentified windfall sites is therefore fairly limited. However, small sites do come forward from time to time.
- 5.14 There is scope for the Council to be more proactive in identifying potential windfall sites. Rather than waiting for the market to promote potential development sites, the Planning Department could proactively survey the borough to identify sites where optimisation may be acceptable to bring forward housing. This might be through mixed use development.

Actions

- **Conduct a survey of the borough to identify potential development sites.**
- **Proactively promote any identified sites (either through allocation, discussions with landowners or the production of planning briefs).**

5. *Promote intensification and mixed use development in the Borough's Employment Zones*

- 5.15 The LPPR relaxes restrictions in Employment Zones to allow additional residential development to come forward as part of a mix of uses where previously this was unacceptable. It is possible that some landowners are unaware of this recent change.
- 5.16 The adoption of a more permissive policy which allows some residential uses in the Employment Zone, providing a significant uplift in business floorspace is also delivered, provides an opportunity to promote sites capable of delivering additional homes.

Actions

- **Identify and promote sites in Employment Zones capable of delivering additional business floorspace and new homes via a capacity study.**
- **Provide design guidance to promote best practice on mixed office and residential schemes.**

6. *Work with Neighbourhood Forums and local landowners to deliver housing sites allocated in adopted Neighbourhood Plans*

5.17 The Localism Act 2011 bestowed new powers on local communities to allow them to bring forward their own Development Plans for their neighbourhoods. These Neighbourhood Plans must pass an independent examination to ensure that the document meets certain legal requirements. If successful, the Neighbourhood Plan is put to a vote of the residents in the neighbourhood area, with a majority vote in favour leading to the Neighbourhood Plan being formally adopted by the Council as another tier of the Council's Development Plan.

5.18 The St Quintin and Woodlands Neighbourhood Plan is the second Neighbourhood Plan to pass a referendum successfully. One of the key policies in the Plan was to allow more residential floorspace in the Latimer Road Employment Zone. The Plan promotes mixed use development on low rise commercial units in Latimer Road. Redevelopment of these buildings provides an opportunity to improve the townscape, retain the commercial businesses at ground floor level and create additional residential units.

5.19 The redevelopment at this site has been approved through a majority vote in the neighbourhood area and therefore enjoys local support as part of the neighbourhood plan process. It is also an example of the type of windfall site that might come forward as part of the sites survey action.

5.20 One of the actions of the Neighbourhood Plan seeks joint working between the Council and the St Quinton and Woodlands Neighbourhood Forum to provide a design code on how to successfully deliver mixed business uses (B1/B2/B8) and Residential (C3) in Kensington. If successful, this project could provide a case study of best practice.

Actions

- **Work with the St Quintin and Woodlands Neighbourhood Forum to bring forward the housing allocation at Units 1-14 Latimer Road.**
- **Produce a design code with the Forum to produce better design on mixed use office and residential uses.**

7. Improve communication with agents and developers to ensure effective identification of issues preventing permissions being translated into people's homes

- 5.21 The production of this Action Plan involved writing to the agents of development sites in the borough to identify if there are any barriers for housing. This has helped to improve the Council's understanding of the issues affecting housing delivery.
- 5.22 However, more could be done to improve communication between agents, developers and the Council to ensure that issues affecting housing delivery are well understood. Improved communication will lead to further actions to ensure that the planning permissions granted by the Council deliver the homes that people need in Kensington and Chelsea.

Actions

- **Continue to monitor closely the development pipeline. Include a standing item on delivery at major site Senior Management Team meetings or the Development Issues Group in the Planning Department.**
- **Write annually to agents representing sites in the development pipeline to identify issues causing delays on housing sites as part of the annual update to this Action Plan.**
- **Build up relationships with agents and developers. Set up formal quarterly meetings between senior planning officers and key agents for the largest sites discussing any issues affecting housing delivery.**

8. Further Review of Planning Conditions

- 5.23 The imposition of particular conditions, the stage of development they are imposed and the time it takes to sign off conditions were issues raised by planning agents as a factor causing some delays to development commencing on particular sites.
- 5.24 Although not a fundamental barrier to housing delivery the Planning Department can review their approach to planning conditions including:
- The necessity of land contamination conditions and delays in getting these signed off.
 - Consider whether detailed materials and landscaping conditions need to be discharged prior to commencement.
 - Consider ways of reducing the time it takes to sign off pre-commencement conditions including any resource bottlenecks.

6. Summary of Key Actions

1. Explore options to build more affordable homes on land in Council ownership, whilst minimising impact on existing communities
2. Prioritise the delivery of key sites such as Kensal Canalside OA
3. Tackle the Borough's stalled housing sites
4. Conduct a Borough wide survey of possible development sites and actively promote any suitable for housing
5. Promote intensification and mixed use development in the Borough's Employment Zones
6. Work with Neighbourhood Forums and local landowners to deliver housing sites allocated in adopted Neighbourhood Plans
7. Improve communication with agents and developers to ensure effective identification of issues preventing permissions being translated into people's homes
8. Further Review of Planning Conditions

Appendix 1: Example of the Letter to Agents

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

17 April 2018

Planning App Reference: [REDACTED]
Please ask for: James Preece

Dear Sir/Madam,

Planning permission at [REDACTED]

The Council is committed to increasing the supply of homes in the Borough across all tenures. However, I am increasingly concerned about the slow pace of constructing homes in the Borough compared to the permissions granted.

I now have staff dedicated to this who I have asked to work with consultants, developers and landowners to understand this better and see how we might help speed up the construction of permitted homes. You will of course already be aware of Government's focus on this issue, and the increased emphasis in the draft National Planning Practice Guidance.

For this site, please provide the following information:

- **The current stage of development;**
- **A brief summary of your project delivery plan and timescales;**
- **The reasons for any delays or particular obstacles holding up progress;**
- **Any actions the Council could take to help you speed up the delivery of housing.**

I would be grateful for an email reply to [REDACTED] by 2 May 2018. One of the Planning Officers in my Planning Implementation Team will then be in touch to discuss matters further.

If you have any initial queries regarding the above please contact James Preece, Senior Planning Policy Officer.

Yours faithfully,

Graham Stallwood
Executive Director, Planning and Borough Development