



Tonbridge & Malling Borough Council

Housing Delivery Test

Action Plan

July 2021

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Tonbridge & Malling Borough Council

Housing Delivery Test – Action Plan

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1. Introduction

- 1.1 The purposes of this Housing Delivery Test Action Plan are twofold:
- i. To understand the issues affecting housing supply in Tonbridge & Malling Borough; and
 - ii. Identify actions to help boost the delivery of new homes.

2. Background – Why is an Action Plan needed?

- 2.1 The Government has an objective of significantly boosting the supply of homes¹.

Housing Delivery Test

- 2.2 To measure how local planning authorities are performing on housing delivery, the Government has established the Housing Delivery Test (HDT)². The HDT is an annual measurement of housing delivery within the area of a plan-making authority, such as Tonbridge & Malling. The latest set of results (2020) provide a measure based on the preceding three financial years, i.e., 2017/18, 2018/19 and 2019/20.
- 2.3 For Tonbridge & Malling, the measure for 2017/18 was the annual average household growth over ten years based on the household projections available at that time, whilst the measure for years 2018/19 and 2019/20 was the Government's standard method for calculating housing need³.
- 2.4 The outcome for Tonbridge & Malling was a HDT 2020 measurement of **91%**. During the three years that were monitored, 2,036 homes were delivered, which compares to the HDT requirement of 2,240 homes. Whilst this is an impressive performance, particularly when you consider the high-level constraints in the borough of the Green Belt and two Areas of Outstanding Natural Beauty, it marginally falls below the threshold the Government has set for the preparation of an Action Plan (95%). As a result, the Council has prepared this Action Plan to identify and understand the

¹ National Planning Policy Framework (2021), para.60: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

² <https://www.gov.uk/government/collections/housing-delivery-test>

³ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

issues that are having a bearing on housing delivery with the objective of finding actions to help boost supply.

- 2.5 It is important to recognise that this is the first time that housing delivery in Tonbridge & Malling Borough has triggered the need for an Action Plan. The figure of 91% follows measurements of 155% and 117% in 2018 and 2019 respectively⁴, when housing delivery exceeded expectations.

3. Local context – What is the profile of Tonbridge & Malling Borough?

- 3.1 Before focussing on specific issues, it is important to take stock of the local context, including a profile of the borough and the position of the Council's Development Plan. The local context can help our understanding of the issues affecting housing supply and highlight possible actions that need to be taken to help boost the delivery of new homes.

Profile of the borough

- 3.2 A spatial portrait is summarised in table 1 (below).

Table 1: Spatial Portrait

Area:	24, 013 ha
Strategic Location:	West Kent. Bordered by: Sevenoaks District (to the west); Tunbridge Wells Borough (south); Maidstone Borough (east); Medway (north); Gravesham Borough (north-west).
Transportation links:	Three motorways (M20, M26 and M2) cross the borough in the north. The A21 trunk road passes by the south and west of Tonbridge. Three train lines providing links to London and the north Kent line. Channel Tunnel Rail Link (channelled under the Kent Downs, no stations). High Speed 1 services stop at Snodland station
Population:	Total: 132,153 (mid-2019 estimate) Aged 0-15: 20.5% Aged 16-64: 60.7% Aged 65+: 18.8%

⁴ [Housing Delivery Test - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test)

Urban/Rural Split:	<p>Most of the borough is rural in character.</p> <p>Largest rural settlements are West Malling, Borough Green, Hadlow, Hildenborough and East Peckham.</p> <p>Principal town: Tonbridge, located in the south-west of the borough.</p> <p>Other built-up urban areas: Kings Hill, Snodland, Aylesford/Ditton/Larkfield/Leybourne (known as the Medway Gap) and Walderslade (part) located in the north-east of the borough.</p>
Assets & Constraints:	<p>Special Areas of Conservation: North Downs Woodland; Peter's Pit (3.54% of the borough)</p> <p>Sites of Special Scientific Interest (SSSIs): 28 (1.32% of the borough)</p> <p>Areas of Outstanding Natural Beauty: Kent Downs and High Weald (26.84% of the borough)</p> <p>Ancient Woodland: 2,621 ha (11% of the borough)</p> <p>Conservation Areas: 60</p> <p>Scheduled Ancient Monuments: 25</p> <p>Listed Buildings: Approx. 1,400 listed buildings or structures</p> <p>Green Belt: Approx. 70% coverage of the borough</p>
Dwelling Stock:	<p>Total: 55,184 (as at 1 April 2019)</p> <p>Private sector: 46,389</p> <p>Private registered provider: 8,437</p> <p>Other public sector: 352</p> <p>Local Authority: 0</p>

- 3.3 As highlighted by this spatial portrait, Tonbridge & Malling is predominantly rural in character with significant high-level constraints, including the Metropolitan Green Belt and two Areas of Outstanding Natural Beauty washing across the majority of the borough.

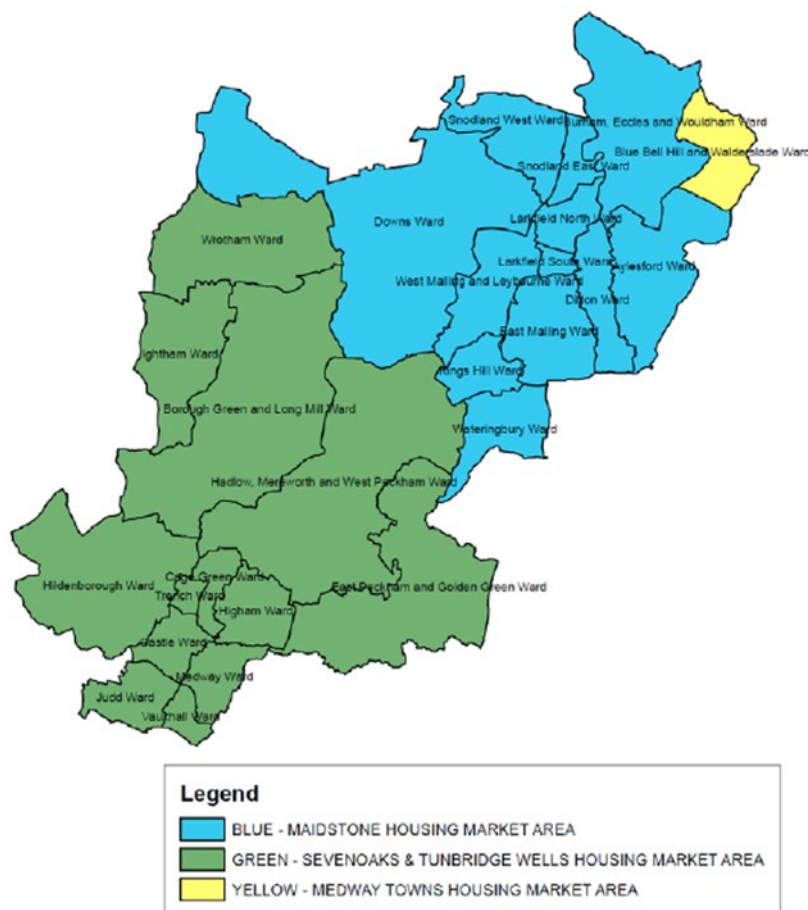
Housing Market Areas

- 3.4 A Housing Market Area (HMA) defines a geographical area within which there is a significant amount of self-containment in terms of the movement of people and activity, e.g., commuting to and from work, travelling to services and shops and buying and selling homes. Within Tonbridge & Malling there are principally two Housing Market Areas (HMAs) that exert an influence across the borough: the

Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA. The HMA boundaries are illustrated in Figure 1 (see below).

- 3.5 According to the Strategic Housing Market Area (SHMA) report published in September 2016, the household split across the two HMAs is broadly even: 51% in the Maidstone HMA; 49% in the Sevenoaks, Tonbridge, Tunbridge Wells HMA⁵.

Figure 1: Housing Market Areas



Housing Affordability

- 3.6 The ratio of house prices to workplace earnings is a good indicator of housing affordability and housing pressures. The larger the number, the bigger the gap between house prices and workplace earnings.

⁵ See Table 13 in SHMA Update (September 2016), Examination Library Document HO4: [Local Plan - Housing SLAA – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](#)

- 3.7 For Tonbridge & Malling, the median housing affordability ratio in 2020 was **11.79**⁶. This means that median house prices were 11.79 time more than median workplace earnings.
- 3.8 To put this into context, the median housing affordability ratio for England in 2020 was 7.84 and for the South East region it was 9.92. This is an indicator that Tonbridge and Malling is a desirable place to live with a strong housing market.

Development Plan – Local Development Framework

- 3.9 The Council has an adopted suite of Development Plan Documents (DPDs) that make up the Local Development Framework (LDF)⁷. These comprise:
- Core Strategy (2007)
 - Development Land Allocations DPD (2008)
 - Tonbridge Central Area Action Plan (2008)
 - Managing Development and the Environment DPD (2010)
- 3.10 In addition, the Council has some saved policies from the Tonbridge and Malling Borough Local Plan.
- 3.11 The base date of the LDF is 2006 and the time horizon is 2021. Given that the Development Plan is more than five years old, the housing requirement contained within the Plan is no longer considered up-to-date. Current assessments of housing supply performance are based upon the housing need generated by the Government's standard method.

Development Plan – Local Plan (emerging)

- 3.12 The Council has prepared a Local Plan to replace the LDF. This has a base date of 2011 and a time horizon of 2031. This makes sufficient provision to address the assessed needs for housing plus some flexibility to adapt to rapid change.
- 3.13 The Local Plan was submitted for Examination in January 2019⁸. This was within the transitional arrangements for the updated National Planning Policy Framework, which meant the assessment of housing need was based upon the Household Projections.
- 3.14 The Inspectors, in their final report, have concluded that the Council has failed to meet the Duty to Cooperate in respect of addressing unmet need arising from plan-making in Sevenoaks District Council. The Council has taken the decision to withdraw the Local Plan and begin a process of review, refresh and resubmission.

⁶ Office for National Statistics:

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

⁷ Council's Development Plan: [Development plan – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk)

⁸ Submitted Local Plan documents are available from the Examination Library: www.tmbc.gov.uk/lpexamlibrary. Details of the Examination: www.tmbc.gov.uk/lpexamnews

Housing Land Supply

- 3.15 The latest published position has a base date of 31 March 2020⁹. As of that date, the Council can demonstrate **2.93 years** of housing land supply, as measured against the housing need generated by the standard method (**843 dwellings per annum** (dpa)). This position does not factor in any of the allocations in the submitted Local Plan because these have yet to be examined.

4. Housing delivery in Tonbridge & Malling – What are the characteristics of supply?

- 4.1 To understand the issues affecting housing delivery and help identify possible actions to boost supply, it is important to drill down and understand how housing is, and will be, delivered locally.
- 4.2 This part of the Action Plan analyses recent completions (2019/20) and extant permissions (as at 31 March 2020), focussing on the distribution of new homes across the borough and the size and nature of sites coming forward.
- 4.3 In terms of distribution, the analysis examines the distribution of housing across the wards in broad geographical areas. These broad geographical areas are:
- i. **North-East** (Aylesford South, Aylesford North & Walderslade, Ditton, Larkfield South, Larkfield North, East Malling, King Hill, West Malling & Leybourne, Snodland East and Ham Hill, Snodland West & Holborough Lakes and Burham & Wouldham)
 - ii. **North-West** (Borough Green & Long Mill and Wrotham, Ightham and Stansted)
 - iii. **Central** (Downs & Mereworth)
 - iv. **South-West** (Cage Green, Trench, Higham, Castle, Medway, Judd, Vauxhall and Hildenborough)
 - v. **South-East** (Hadlow & East Peckham)
 - vi. **East** (Wateringbury)
- 4.4 It should be noted that those wards located in the North-East are beyond the outer edge of the Metropolitan Green Belt designation. Some have the outer edge abutting a western or southern boundary, e.g., West Malling & Leybourne. This part of the borough includes the urban areas of the Medway Gap, Kings Hill, Snodland and Walderslade as well as the rural service centre of West Malling.
- 4.5 The remaining geographical areas lie within that part of the borough covered by the Metropolitan Green Belt. They include the urban area of Tonbridge and the rural service centres of Borough Green, Hadlow, East Peckham and Hildenborough. None

⁹ See Housing Land Supply Position as at 31 March 2020: [LDF - housing land supply position – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk/LDF-housing-land-supply-position-Tonbridge-and-Malling-Borough-Council)

of these settlements are washed over by the Green Belt; they have clearly defined boundaries beyond which lies the designation.

Completions (2019/20)

- 4.6 The distribution of completions across the borough is highlighted in Chart 1 (below). The numerical values are set out in Table 2.

Chart 1: Housing Completions (net) 2019/20

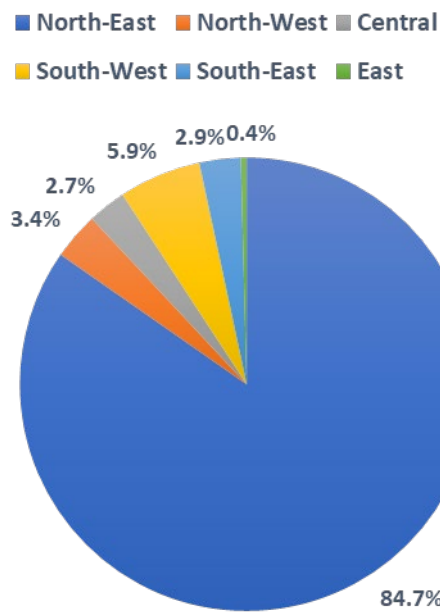
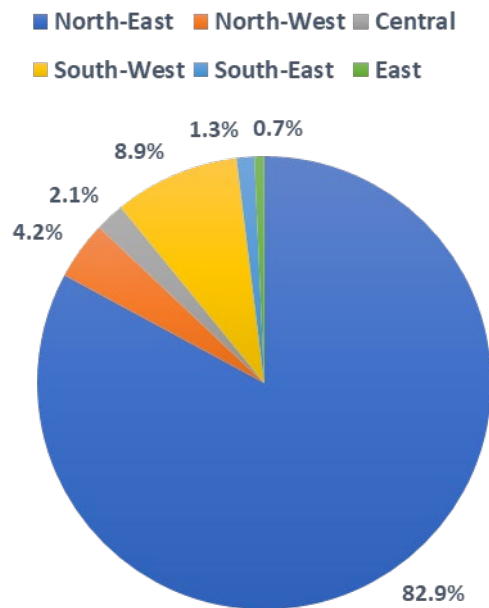


Table 2: Housing Completions (net) by Area 2019/20

Area	Completions (units)
North-East	404
North-West	16
Central	13
South-West	28
South-East	14
East	2

Extant Housing Permissions as at 31 March 2020

- 4.7 As at 31 March 2020, there were **2,454 units** with extant planning permission.
- 4.8 The distribution of extant permissions across the borough is highlighted in Chart 2 (below). The numerical values are set out in Table 3.

Chart 2: Extant Housing Permissions (net) as at 31 March 2020**Table 3: Extant Housing Permissions (net) by Area as at 31 March 2020**

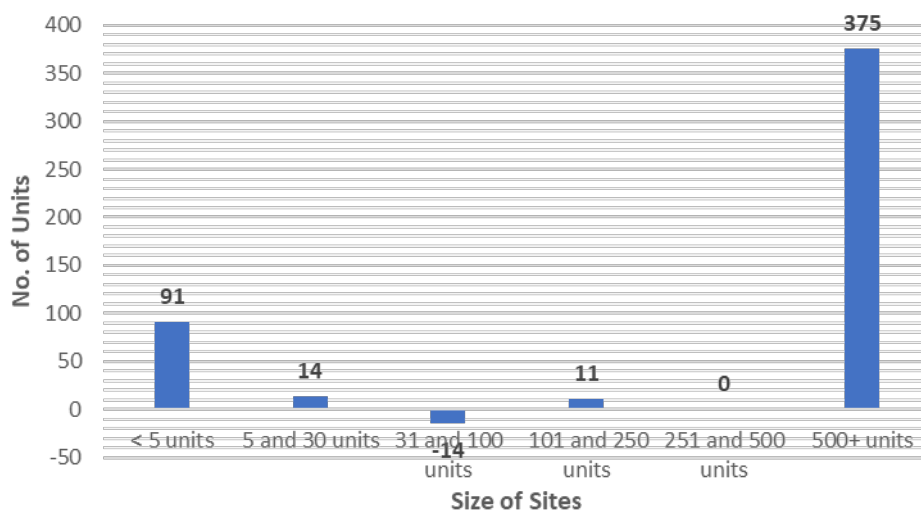
Area	Permissions (units)
North-East	2,034
North-West	102
Central	51
South-West	219
South-East	31
East	17

- 4.9 It is evident that the majority of new homes (over 80%) are being delivered within the North-East part of the borough. This is unsurprising, in the absence of an up-to-date development plan, given that this part of the borough lies beyond the significant constraint of the Green Belt.

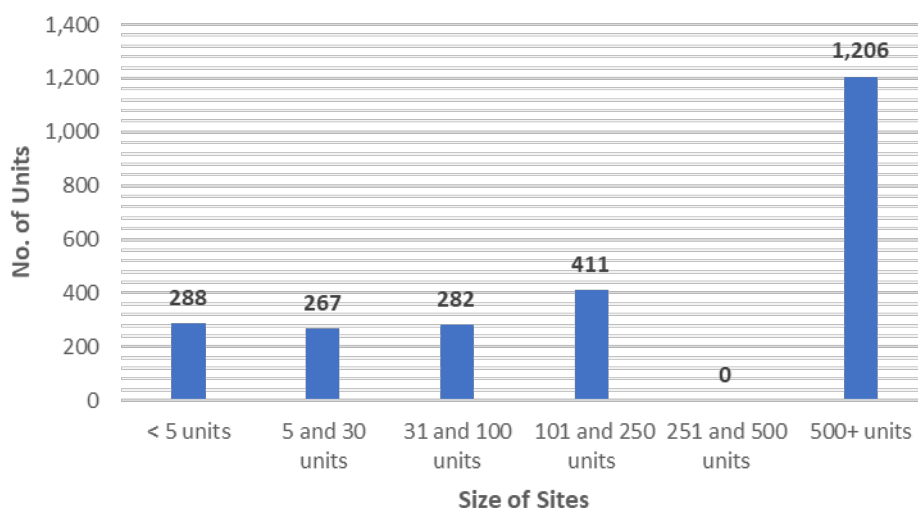
Size of developments

- 4.10 It is also helpful to understand the size of sites that are coming forward for housing development. This is an important consideration for identifying appropriate actions to facilitate participation in the local housing markets by a range of builders, big and small.
- 4.11 Charts 3 and 4 (below) illustrate the distribution of housing supply across the following groups of sites:
- Sites of fewer than 5 units
 - Sites of between 5 and 30 units
 - Sites of between 31 and 100 units
 - Sites of between 101 and 250 units
 - Sites of between 250 and 500 units
 - Sites of more than 500 units.
- 4.12 The yield for each site reflects either the number in the outline planning permission (for larger sites) or the number in the full planning permission (for smaller sites).

Chart 3: Housing Completions (net) by Size of Site 2019/20



- 4.13 Over three-quarters (78.6%) of housing completions during 2019/20 took place on sites of 500+ units, including Peters Village and Kings Hill (Phase 3). Approximately 3% of the additional housing was delivered on sites of between 5 and 30 units.

Chart 4: Extant Housing Permissions (net) by Size of Site as at 31 March 2020

4.14 Approximately a half (49.1%) of new homes that are in the pipeline are expected to come forward on sites of 500+ units in total. Just over one-fifth (22.4%) are expected to come forward on sites of between 5 and 100 units.

Previously-Developed Land

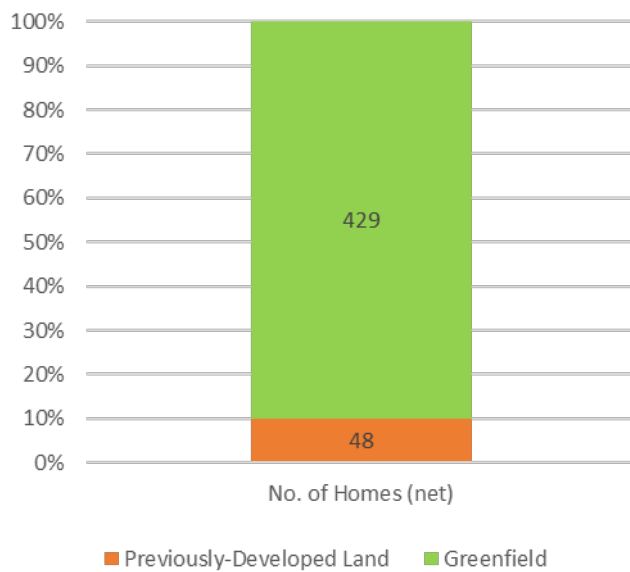
4.15 As well as distribution and size, the nature of sites coming forward for development for housing is an important element of profiling. In particular, the proportion of housing coming forward on previously-developed and greenfield land. This can help inform decisions on whether further actions exploring additional opportunities to make the most of previously-developed land within existing settlements is needed.

4.16 For the purposes of this analysis, the Council has applied the Government's definition of previously-developed land set out in the NPPF, Annex 2¹⁰:

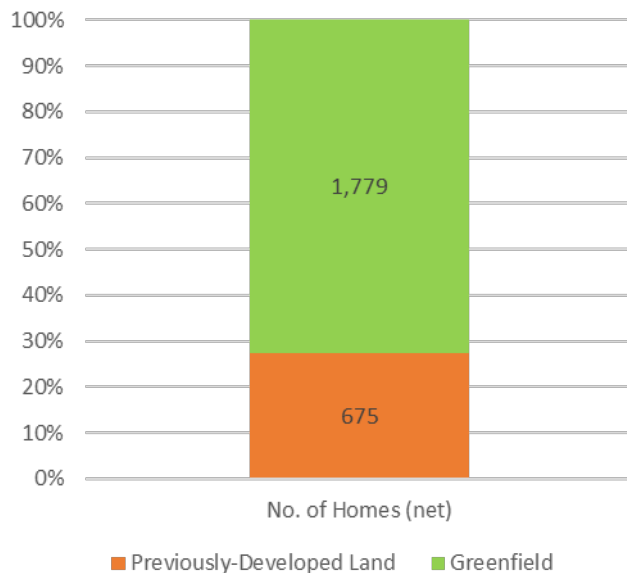
Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

4.17 The outcomes of this analysis are highlighted in Charts 5 and 6 below.

¹⁰ NPPF (2021), Annex 2: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91212/nppf-annex-2.pdf)

Chart 5: Completions (net) by Nature of Site 2019/20

4.18 Approximately 90% (89.9%) of housing completions during 2019/20 took place on greenfield sites. This is largely a reflection of the supply from the Peters Village and Kings Hill (Phase 3) and the former Holborough Quarry sites.

Chart 6: Extant Planning Permissions (net) by Nature of Site as at 31 March 2020

4.19 Nearly three-quarters (72.5%) of homes in the pipeline are expected to come forward on greenfield sites.

5. Decision-taking on housing – What is the Council’s record?

- 5.1 Understanding how the Council performs in respect of determining planning applications for dwellings is important contextual information that can help inform decisions on the necessary actions to help boost future housing supply.
- 5.2 An analysis of the Council’s record should provide an indication of whether or not the issue of insufficient housing supply is a consequence of decision-taking.

Planning Application Statistics – Major (Dwellings)

- 5.3 The source of this data is the Government’s ‘Live tables on planning application statistics’¹¹, in particular the interactive dashboard for district planning applications. This information has been collated from the PS2 forms provided by local planning authorities.
- 5.4 For the purposes of this analysis, a time frame of two years has been applied, starting from 1 April 2018 (2018, Q2) to 31 March 2020 (2020, Q1). The analysis has focussed on major applications for dwellings (10 or more homes). It compares the statistics for Tonbridge & Malling with those at the local (neighbouring authorities), regional (South East) and national (England) levels.

Table 4: Major Planning Applications (Dwellings) – 1st April 2018 to 31st March 2020

	Total decisions (all)	Total granted (all)	% granted (all)	Total decided in time (all)	% decided in time (all)
TMBC	29	16	55%	21	72%
Sevenoaks	19	14	74%	17	89%
T.Wells	61	42	69%	57	93%
Maidstone	92	76	83%	88	96%
South-East	2,784	2,115	76%	2,370	85%
England	14,638	11,966	82%	12,660	86%

- 5.5 It is evident that the Council’s record in determining major planning applications for residential development in time is good (72%), although it is not as good as neighbouring authorities and the regional and national figures.
- 5.6 In terms of the % granted (all), the figure recorded by the Council is significantly lower than that recorded at the regional and national levels. In Tonbridge & Malling just over half of the total decisions resulted in the granting of planning permission

¹¹ Live tables on planning application statistics: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

between 1 April 2018 and 31st March 2020 which compares with 76% and 82% for the South-East and England respectively.

- 5.7 There are several factors that need to be taken into consideration when reading these results including the constraints encountered at the application sites, the nature of the applications and local decision-taking processes. However, it should be noted that both Sevenoaks District Council and Tunbridge Wells Borough Council face similar high-levels constraints, including a combination of the Green Belt and Areas of Outstanding Natural Beauty, yet they have granted a higher proportion of major applications for dwellings.

Planning Application Statistics – Minor (Dwellings)

- 5.8 This analysis relies upon the same data sources as major applications (see above).
- 5.9 It focusses on the same time frame of two years but instead looks at decisions made in respect of minor development, i.e., development of fewer than 10 homes. The results are set out in Table 5 below.

Table 5: Minor Planning Applications (Dwellings) – 1st April 2018 to 31st March 2020

	Total decisions (all)	Total granted (all)	% granted (all)	Total decided in time (all)	% decided in time (all)
TMBC	272	207	76%	233	86%
Sevenoaks	558	423	76%	439	79%
T.Wells	464	355	77%	445	96%
Maidstone	454	292	64%	435	96%
South-East	19,346	13,537	70%	15,657	81%
England	106,848	78,543	74%	88,103	82%

- 5.10 The Council has a very good record both in terms of determining minor planning applications in time (86%) and granting planning permission for minor housing development (76%), in comparison to the position at the regional and national level. Within the local context of mid and west Kent, the Council determined and granted the fewest number of planning applications for minor development (dwellings), although this is in part a reflection of the number of applications received.

6. Root cause analysis – What does the evidence say about housing delivery?

- 6.1 The root cause analysis scrutinises the evidence highlighted above to determine what it is saying about local delivery. It assesses if there are issues, trends, factors and implications for delivery.

Local factors

- 6.2 The key local factors that are affecting housing delivery in Tonbridge & Malling borough are:
- i. **Development Plan** – The Council’s adopted development plan, the Local Development Framework, is reaching the end of its time horizon (September 2021 and most of the housing allocations within it have been implemented. The Local Plan that was submitted for Examination in January 2019 has stalled and the Inspectors’ have found that the plan-making process failed the Duty to Cooperate process. This is an issue for supply because it is only an up-to-date adopted development plan that can set a balanced development strategy across the borough, including the removal of parcels of land from the Green Belt where exceptional circumstances exist, to help deliver a sustainable pattern of housing supply where the needs are broadly generated.
 - ii. **Constraints** – The majority of consented housing capacity is found in the least constrained parts of the borough, beyond the outer Green Belt boundary. Given the influence of the HMAs, this is an issue for the sustainable pattern of development and addressing needs where they are generated. The Local Plan is the primary tool that can help overcome this imbalance.
 - iii. **Portfolio of sites** – Delivery is dominated by supply from large strategic sites (500+ units). There is not a balance of supply across a range of sites. In particular, only a small proportion of consented housing capacity can be found on small-medium sized sites. This is likely to be an issue for SME house builders accessing the local markets given the dominance of national volume house builders on strategic sites. Furthermore, it could be an issue for the resilience of housing delivery locally if only a few key house builders are responsible for most of the delivery.
 - iv. **Effective use of land** – Promoting an effective use of land in meeting the need for homes forms part of national planning policy¹². Within the borough, the majority of housing is being delivered on greenfield sites. This can be

¹² National Planning Policy Framework (2021), section 11: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/national-planning-policy-framework)

attributed, in part, to limited opportunities for the redevelopment of previously-developed land within existing settlements, particularly in the absence of an up-to-date development plan. However, it is a prompt for taking stock and updating the Council's understanding of whether all opportunities for optimising the use of land, particularly previously-developed land including the Council's own assets, have been explored and evaluated. This could take the form of an urban capacity study focussed on the existing urban areas and rural service centres as well as a new call for sites exercise and consideration of the brownfield register, as part of the evidence gathering for the refresh of the Local Plan. Of course, given the character of some of the places in the borough, it should be recognised that making effective use of land may mean less rather than more for certain sites.

- v. **Decision-taking** – This, generally, does not appear to be a significant factor affecting the supply of housing, given the comparatively good recent record of the Council. However, there is merit in developing a better understanding of the differences between the Council's record for the determination of major planning applications for dwellings and the record of neighbouring authorities, (see Table 5), especially when the pipeline of supply is currently dominated by larger sites.

Contextual factors

- 6.3 In addition to these local factors, it is important to recognise and understand the wider contextual issues that will continue to have a bearing on housing supply, certainly in the short-medium term. The Council has no control or influence over these matters:

- i. **Covid-19 Pandemic** – Whilst the house building industry has demonstrated some resilience in response to the pandemic, in part through support from the Government, there are some consequences that even it has little or no control over. The shock to the economy has resulted in financial institutions, understandably, becoming more risk adverse and very cautious. This may have an impact on the number of mortgages that are signed-off which in turn could have an impact on the delivery of new homes. If the flow of home buyers starts to dry up, a potential consequence could be that supply may do the same. Tonbridge & Malling Borough Council, as the local planning authority, has no control over this. Furthermore, the Council recognises that stimulants such as the Stamp Duty holiday as well as the safety net of the furlough scheme will not last for much longer.

- ii. **Exit from the European Union (EU)** – It is still too early to say what the medium-term impacts might be on the housing sector. However, prior to the UK's departure from the EU, concern was expressed in some quarters about the impact it may have on the available workforce to build new homes, particularly in the South-East, which is where Tonbridge & Malling is located. Concerns have also been expressed about the availability and cost of some imported materials post the UK leaving the EU. This may have a bearing on the future supply of homes which Tonbridge & Malling Borough Council, as the local planning authority, has no control over.
- iii. **Permitted Development (PD) Right Changes** – Finally, the Council is mindful that the Government will introduce changes to the PD rights from the 1 August 2021 to allow Class E uses (commercial, business and service) to change to residential (Use Class C3), subject to prior approval. This could have a big influence on where and how many new homes are supplied in the medium-long term, yet the role of Tonbridge & Malling Borough Council, as the local planning authority, will be limited to the matters that will be subject of the prior approval process including flooding, transport impacts, contamination, noise from existing commercial premises and adequate natural light. Innovative thought will be required to help ensure places such as the centre of Tonbridge can remain a vital and vibrant place to enjoy.

7. Key actions – How can housing delivery be boosted?

- 7.1 This section sets out the actions the Council is committed to either taking or investigating further to help boost housing delivery in Tonbridge & Malling.
- 7.2 These actions flow from the root cause analysis, which is based upon the local evidence set out in the earlier sections of this Plan. Some of the actions reflect current practice.
- 7.3 For clarity, the actions are tabulated (see Table 6, overleaf).
- 7.4 Below are the explanatory notes:

Explanatory notes for Table 6:

Root cause factors addressed – These are the local factors set out in section 6 (above), namely:

- i. Development Plan
- ii. Constraints
- iii. Portfolio of sites
- iv. Effective use of land
- v. Decision-taking

Timescales – The short, medium and long-terms are defined as:

- **Short** (0-6 months); **Medium** (6 months – 2 years); **Long** (2+ years).

Lead team & other parties – This is primarily focussed on which team within the Council will take the leading role in implementing the action. For the most part this will either be:

- Development Management (**DM**) or Planning Policy (**PP**).

There is, of course, the important role of Local Councillors (**LC**).

There may opportunities for Housing Officers (**HO**) to be involved in implementation, plus external parties including House Builders (**HB**), Registered Partners (**RP**), Specialist Consultants (**SC**), and Government Agencies (**GA**)

Table 6: Key Actions to help boost housing delivery

Action	Root Cause Factors Addressed	Outcome	Timescale	Lead team & other parties
1. Adopt up-to-date Local Plan	i, ii, iii, iv and v.	A plan-led system with a development strategy that addresses housing needs in a sustainable pattern across the borough with a mixed portfolio of sites making the effective use of land within and adjacent to settlements at, or close to, the top of the settlement hierarchy.	Medium	PP, LC + SC
2. Urban Capacity Study	iv	An up-to-date understanding of the current capacity for development on previously-developed land within the confines of the larger settlements. This would include looking at the Council's own assets and the role they could play in boosting housing supply. The outcomes would provide evidence for the refresh of the Local Plan (see above).	Short-Medium	PP + SC
3. Development brief for the largest allocation in the emerging Local Plan, Borough Green Gardens	ii, iii, iv and v.	A development brief to facilitate the sustainable and timely development of the largest allocation, making the effective use of land in line with the garden community principles.	Short-Medium	PP, LC, SC, HBs and GA
4. Front-load masterplans for large sites (approx.500+ units)	iv and v	Masterplans prepared and shared with the Council pre-submission of the formal planning application, i.e. at pre-application stage, to	Medium-Long	HB, in conjunction with PP and DM, having regard to design codes, when and where available.

Action	Root Cause Factors Addressed	Outcome	Timescale	Lead team & other parties
		demonstrate commitment to good place-making in a timely fashion.		
5. Planning Performance Agreements (PPAs)	iv and v	Continued appropriate use of PPAs to project manage large developments, to agree timescales, actions and resources for handling applications. Engage PPAs early in the process at the pre-application stage, in accordance with the Council's existing protocol ¹³ as published and kept under review.	Short-Medium-Long	DM & HB
6. Pre-planning application discussions on potential sites (proactive)	iv and v	Continued appropriate use of pre-planning discussions to identify issues and barriers that need to be addressed or overcome ¹⁴ .	Short-Medium-Long	DM with HB
7. Monitor and review performance on the determination of planning applications for housing	v	An up-to-date (monthly) understanding of decision-taking performance (major and minor applications for dwellings), within the local (Kent districts), regional (south-east) and national (England) ¹⁵ contexts, with a view of investigating opportunities for improvements.	Short-Medium-Long	DM
8. Encourage the submission of full	v	Greater number of full planning permissions for major residential	Short-Medium-Long	DM

¹³ Details of the Council's PPA protocol can be accessed online: [Request pre-application planning advice – Tonbridge and Malling Borough Council \(tmhc.gov.uk\)](https://www.tonbridge-malling.gov.uk/Request-pre-application-planning-advice)

¹⁴ Details of the Council's pre-application and general planning advice can be accessed online: [Request pre-application planning advice – Tonbridge and Malling Borough Council \(tmhc.gov.uk\)](https://www.tonbridge-malling.gov.uk/Request-pre-application-planning-advice)

¹⁵ Live tables on planning application statistics: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

Action	Root Cause Factors Addressed	Outcome	Timescale	Lead team & other parties
planning applications – discourage the submission of outline planning applications, where appropriate		development, as opposed to outline permissions and reserved matters, to effectively address quality place-making and the delivery of homes upfront to help boost supply.		
9. Planning conditions – Include conditions on outline planning permissions for the submission of reserved matters within 12 months of the decision	v	Shorter timeframe for the submission of reserved matters, i.e. aim to agree a deadline of 12 months from the date of the outline planning permission, to facilitate earlier development to help boost housing delivery within the following five years.	Short-Medium-Long	DM
10. Legal agreements – monitor s.106 agreements, including trigger points for payments	v	An established monitoring system of legal agreements and their trigger points to keep track of the delivery of essential infrastructure that is necessary to support and facilitate housing supply.	Short-Medium-Long	DM
11. Pre-commencement conditions - a flexible approach	v	Continued flexible approach to these conditions, i.e. consideration of whether they can be related to a later stage in the development or whether they can be employed on a phased basis, to facilitate the timely delivery of new homes.	Short-Medium-Long	DM
12. Minor changes after development has commenced – a	v	Continued proactive and flexible approach to the determination of minor amendments to matters such	Short-Medium-Long	DM & LC

Action	Root Cause Factors Addressed	Outcome	Timescale	Lead team & other parties
proactive and flexible approach		as house type substitutions in response to changing market demand, to help keep the delivery of sites on-track.		
13. Modern Methods of Construction (MMC) - a positive approach	v	A positive approach to high quality, well-designed MMC schemes that can facilitate higher delivery rates of homes, with significant off-site construction in controlled environments, at potentially more affordable prices.	Short-Medium-Long	DM & LC
14. On-going positive engagement with delivery bodies of development sites	v	Establish and maintain clear lines of communication with landowners, agents, developers and house builders of large sites, as well as development partners such as Registered Providers (RPs), to obtain up-to-date information on the build-out rates and future delivery plans of current sites in order to identify any barriers and how they may be overcome.	Short-Medium-Long	PP & DM with HB & RP
15. Research, identify and bid/apply for funding for supporting infrastructure	iv	Making the most of opportunities presented by Government (and other) funding for essential infrastructure to support and facilitate the delivery of housing.	Short-Medium-Long	PP, DM & possibly GA
16. Evidence gathering on delivery issues	v	Clear evidence to address delivery issues where there is uncommon	Short-Medium-Long	PP, DM, SC & HB

Action	Root Cause Factors Addressed	Outcome	Timescale	Lead team & other parties
		ground, to unblock stalled schemes to facilitate the supply of housing and supporting infrastructure in an optimum way.		
17. Housing Land Supply – Up-to-date monitoring of permissions and prior approvals on-demand	v	A sophisticated monitoring system that adds value to the current set up by providing up-to-date reports on the status of sites (on-demand), including information on new and expired permissions and prior approvals. These reports can provide the trigger for further engagement with applicants to understand current delivery intentions and any barriers to delivery that may be overcome.	Short-Medium-Long	PP with DM & HB
18. Identify housing delivery as a Council corporate priority	v	A corporate commitment to the delivery of new homes to address the range of housing needs across the borough.	Short-Medium-Long	LC
19. Members' training and engagement	i & v	A continued programme of members' training and engagement on planning matters, including plan-making and decision-taking.	Short-Medium-Long	DM & PP with LC

8. Implementation and Monitoring

- 8.1 The Council understands that positive, continued engagement with those parties involved in the delivery of homes is essential if supply is to be boosted.
- 8.2 The implementation of this Action Plan will require the commitment and efforts of a range of people, organisations and groups, including planning officers, councillors and house builders, as highlighted by Table 6 (above). Where possible, the Council will explore opportunities to access key players via existing forums such as the Kent Developers' Group.
- 8.3 The Council has engaged with many of these people during the preparation of the Plan, to ensure that it is realistically achievable and that the key players are on-board.
- 8.4 The Council will keep the Plan under review and will reassess the actions after the publication of the Housing Delivery Test results for 2021.