



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

August 2020



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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1. Introduction

Why housing delivery is important

- 1.1 The Government's Planning for the future, White Paper was published on 6 August 2020, with consultation closing on 29 October. The proposed radical reforms to the planning system are underpinned with the aim to increase housing supply and making the planning system much simpler. It is structured around three pillars – 1. Planning for Development, 2. Planning for beautiful and sustainable places and 3. Planning for infrastructure. It is aimed at delivering “The homes we need in the places we want to live in at prices we can afford, so that all of us are free to live where we can connect our talents with opportunities.”
- 1.2 We have worked very hard since we produced the last action plan. We have a relatively new Local Plan adopted in 2019. We adopted a new Statement of Community Involvement in Feb 2020. This has committed us to digital engagement reflecting the ambitions of the Planning White Paper. We have had huge success using digital engagement in our consultations and recognise that this is key in bringing sites forward with community support. We have set up a dedicated Growth and Delivery Team working proactively to support delivery of sites in the borough. The Council has set up its own programme of house building and has secured permission for the first 100 homes in July this year. In addition, we have granted permission in excess of 600 homes in just this calendar year.
- 1.3 Although 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 we are 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.
- 1.4 Our adopted Local Plan, (2019) sets out a strategy for boosting housing delivery and allocation of new sites to bring forward new residential development. In addition, the Community Housing Supplementary Planning Document (SPD) was adopted in June 2020 and sets out guidance to deliver more affordable homes in the borough in line with the emerging New London Plan. We have now commenced a New Local Plan Review (NLPR), with an Issues paper currently being drafted (Pre-Reg 18) with the aim to have an Issues/Options paper out by Spring/Summer 2021. We will produce our NLPR alongside the planning reforms proposed by government and will undertake our evidence to consider the impacts of Covid-19 pandemic on future forecasting.

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

1.5 The latest National Planning Policy Framework 2019 (NPPF) and National Planning Policy Guidance (NPPG) introduces the 'Housing Delivery Test' (HDT) in a phased approach over three years. When published next in November this year, we will be in the last of these three years of transition. 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).
- Where a new housing requirement is adopted after the publication of the measurement, the HDT calculation will be re-run using the new requirement as set out in paragraphs 17 to 18 of the Housing Delivery Test rule book. This will apply once emerging new London Plan is adopted, as RBKC new housing target will be 448 new homes per year instead of 733.

1.6 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.

1.7 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.

1.8 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?

1.9 The action plan is required to be produced where housing delivery is below 95% of housing requirement. The latest 2019 Housing Delivery Test published in February 2020 shows that only 57% of the required homes were built in the borough over an average of the past 3 years.

1.10 The House Delivery Test: 2019 measurement result:

2016-17	2017-18	2018-19	Total number of homes delivered	Total number of homes required	Total number homes	Housing Delivery Test: 2019 Consequence
335	317	51	703	1,234	57%	Buffer

1.11 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 the following aims:

- 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 In July 2019 the Council received the Inspector’s Report to the examination of the Local Plan., which confirmed that the Council could demonstrate a five-year housing supply.
- 2.3 Since the Local Plan was adopted (as the Core Strategy) in 2010, 2,569 new homes have been built.
- 2.4 In 2019/20 Financial Year 524 (net) new homes were granted planning permission, giving a total of 701 new homes in total that have been approved over the calendar year (note: some are subject to S106 agreements), boosting the housing supply in the borough.

2.5 Table 1: Housing Approvals and Completions Vs Housing Targets RBKC 2010-2019

	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	Total
Housing supply target	600	600	600	600	600	733	733	733	733	5,932
New residential approvals	783	860	244	1292	1303	252	459	177	296	5,666
Net residential completions	175	102	65	264	982	341	190	335	115	2,569

Source: RBKC Annual Monitoring Report 2019

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

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

Adopting the Local Plan in September 2019 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.

- 2.7 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.
- Adoption of RBKC Community Housing SPD in June 2020 provides guidance on the delivery of more affordable homes in new developments.
- 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.

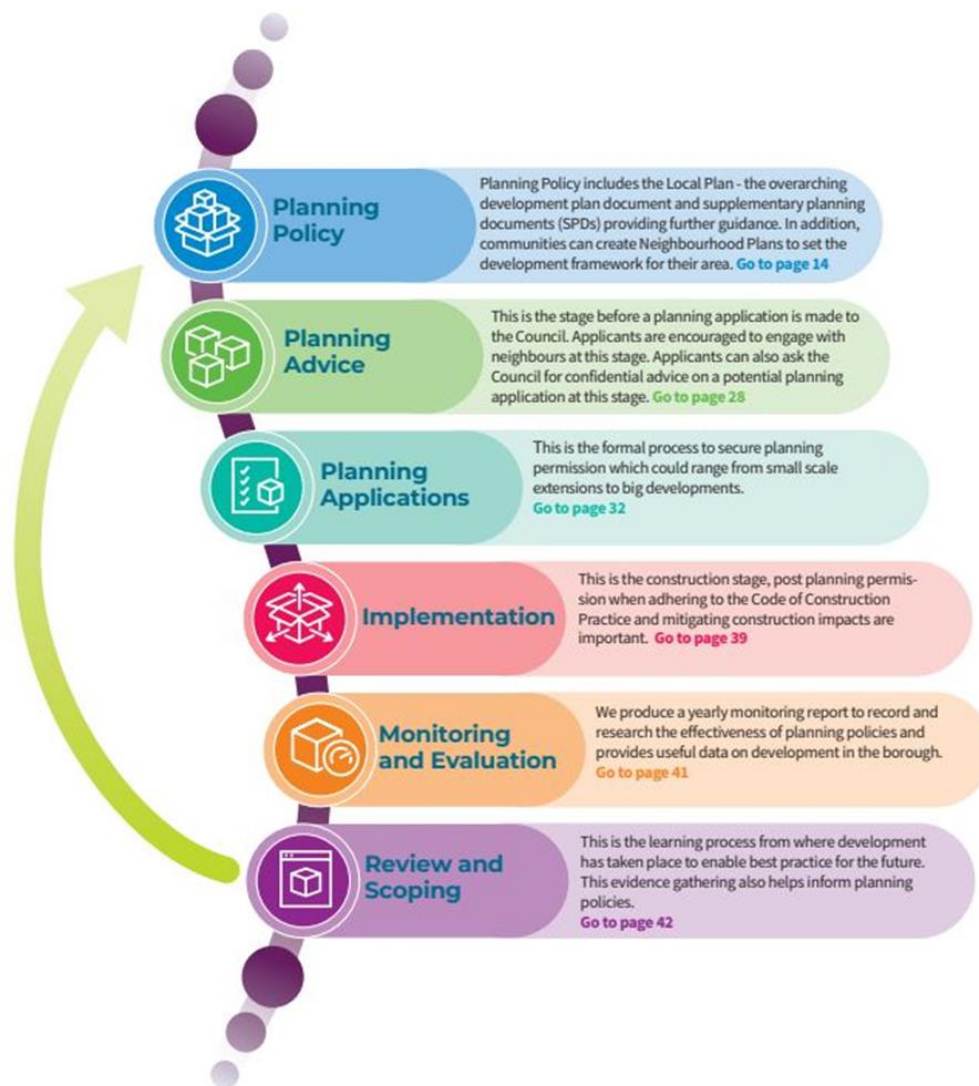
Statement of Community Involvement

A Statement of Community Involvement (SCI) document¹ was published in February 2020 that aims to set out the way in which we will involve residents, businesses, community groups, investors and other stakeholders on planning matters.

There are a number of inter-linked stands within planning (see Figure 1). Our residents and other stakeholders may interact with planning across all of them or only at one particular stage. We consider that building consensus at an early stage is essential to a smooth and efficient planning process and to help with the delivery of sites.

¹ <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/statement-community-involvement>

Figure 1: Spine of Planning



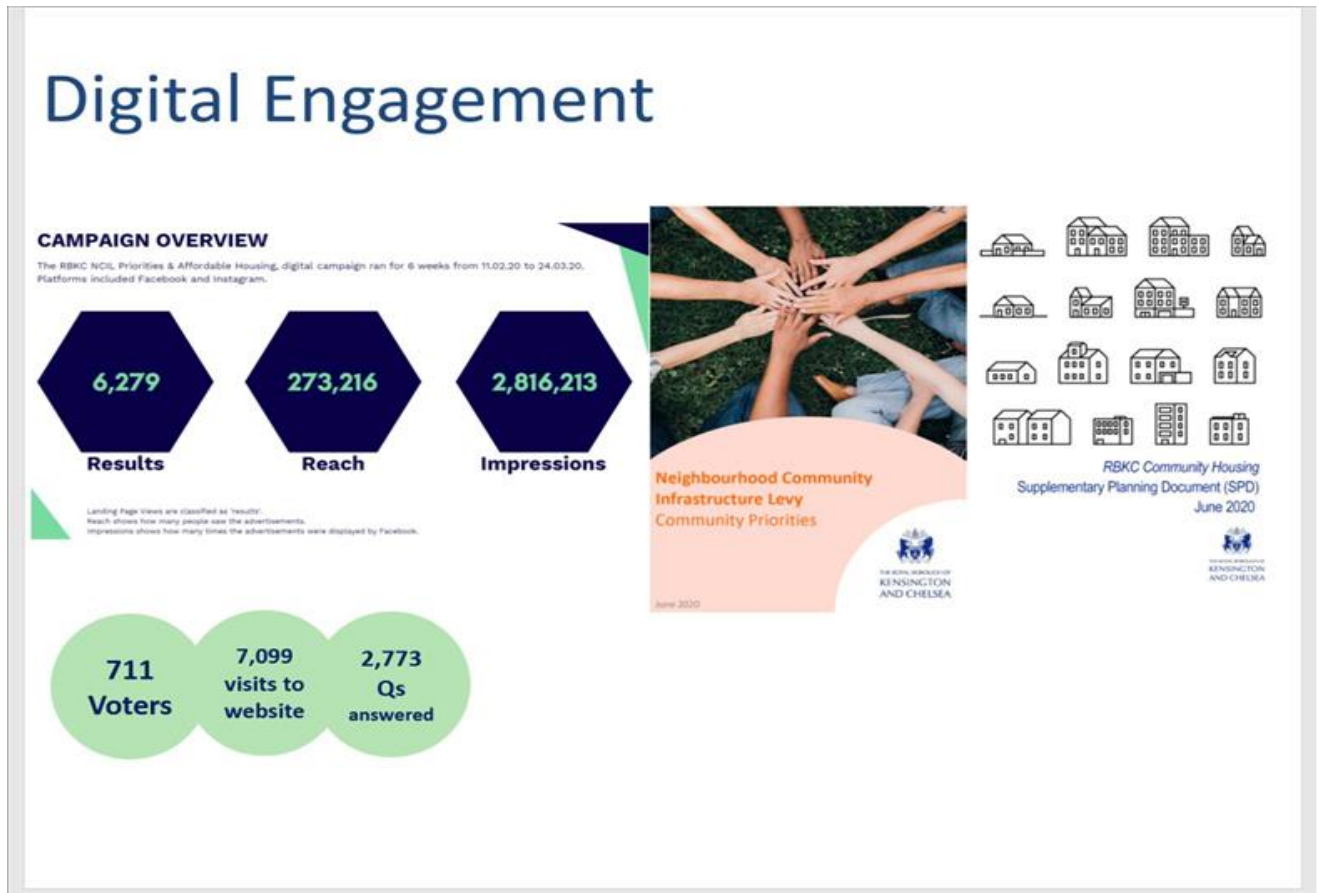
Digital Engagement

The key changes to consultation techniques is reaching out to our communities through digital engagement. Although traditional methods may still be used the majority of engagement is now done via online communication which has proven more effective and engaging in promoting planning policy consultations and opportunities to discuss major planning applications.

The Build ID advertises on social media (such as Facebook, Instagram) and is clear, engaging and quick to use. Earlier this year we consulted on RBKC Community Housing Supplementary Planning Document (SPD). We used

digital consultation to supplement and as a result our consultation reached (was seen by) 273,216 people, 2,816,213 people clicked on the link which resulted in 6,279 people responding to the consultation. Figure 2 shows the overall results as an example of the successful digital engagement used for this policy document.

Figure 2: Results using Digital Engagement



Setting up a Growth and Delivery Team

The Growth and Delivery Team was set up to promote good growth through proactive planning and is responsible for major projects that focus on site delivery and good community engagement. This includes work on the Council’s two Opportunity Areas, the Council’s new homes delivery programme, site briefs for other key sites, a Borough wide Character study and delivering capital projects delivering high social value.

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. In 2019/20, 98% of applications were

registered, validated and public consultation commenced within five days. We decided 86% of major applications within 13 weeks, and 79% of minors and 79% 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 produced 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 anticipate setting up a Housing Agents’ Forum, which will be a forum for the identification of problems affecting housing delivery. The aim is to meet regularly to share important information and to get feedback from those building homes in the Borough.
- Working collaboratively with neighbouring and upper tier authorities where applicable to address strategic level issues, such as infrastructure or transport related issues.

Good early Communication with our Residents and Communities

- The Council is setting up Development Forums which will provide a more structured approach facilitated by the Council to pre-application discussion between developers of larger schemes and interested residents and other stakeholders. This should assist in ensuring that the promoters of emerging schemes consider views at an early stage and hopefully will result in a smoother passage for schemes coming forward.

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 August 2020, to determine the number of homes completed in the borough.
- Previously written letters to agents on sites delivering 5+ net dwellings in the pipeline of sites with planning permission.
- Set up meetings with agents representing numerous sites in Kensington and Chelsea.
- Presented to the Agents' Forum.
- Gathered evidence from Development Management Team Leaders and officers.
- Reviewed s106 payments and trigger points.

4. Barriers to Housing Delivery

Barriers / Issues Identified

Covid19

4.1 The devastating impacts of Covid19 has meant uncertainty in terms of planning and housing delivery this year, which has impacted the delivery of housing not

only short term but long term. The Council is still progressively working towards recovery from this pandemic and understanding the impact it will have on the housing market in the short and longer term effect on housing delivery in the borough.

Lack of available land / sites

- 4.2 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.
- 4.3 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

- 4.4 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.
- 4.5 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

4.6 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

4.7 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

4.8 The delivery of expensive infrastructure and affordable housing contributions is met through Policy CH2 of the Local Plan 2019 which require developments to provide a minimum of 35% of all residential floorspace as affordable housing on sites that provide 650sqm or more of gross residential floorspace. The threshold approach is relatively new and only embedded in the Local Plan from September 2019. There have been a couple of large schemes where it has been met including 100 West Cromwell Road delivering 184 affordable homes. We will monitor the effectiveness of this policy but it provides more certainty for developers.

- 4.9 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.
- 4.10 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

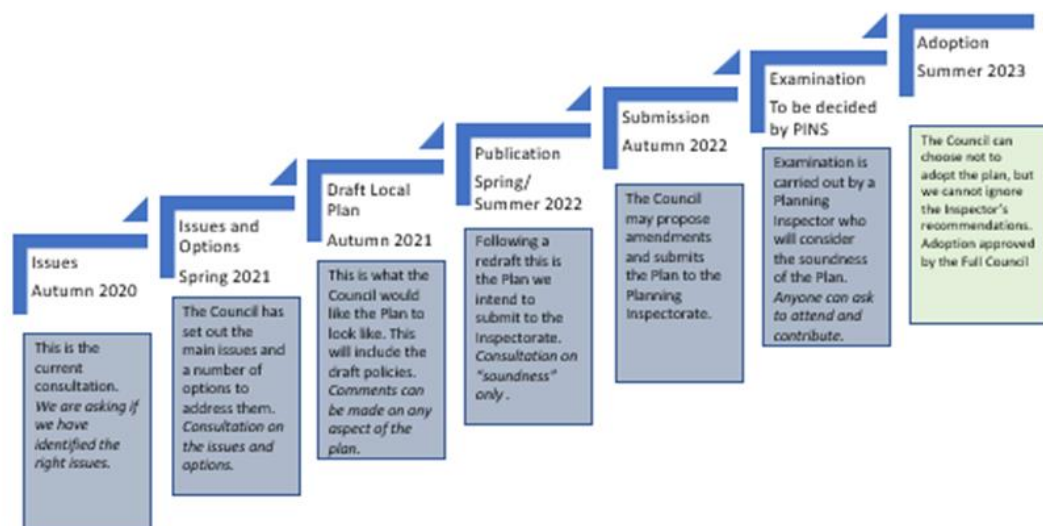
5.1 The Council is looking at a range of actions to boost housing delivery in Kensington and Chelsea. The following actions can help to stimulate the delivery of housing in the Borough.

1. **Delivery of New Local Plan Review**

- The New Local Plan Review (NLPR) will include both spatial and detailed policies and site allocations. It will set out a vision and a framework for future development for the Borough, addressing needs and opportunities for housing, the economy, social and community facilities, transport, addressing the climate change emergency, securing good design conserving historic environment and providing necessary infrastructure to support development.
- Undertaking another "call for sites" through this process to identify more sites for housing.
- Updating our evidence of need through further studies, allocating more sites, looking at further optimisation of land with improved design, looking for good growth to meet and exceed our housing targets.
- We acknowledge the recent proposed changes to planning in the White Paper and are ready to produce our Local Plan alongside planning reforms and are prepared to front load to accelerate housing delivery by way of granting permissions in principle and provide design codes and guidance to bring development forward.
- Community Engagement and building consensus will play a big part in preparing the NLPR which will support more housing delivery in the borough and housing needs. Help drive the post-Covid-19 recovery.

- Address the Government’s inclusive growth agenda and see the delivery of some 4,500 new homes across the Borough in the next ten years.

Figure 3: NLPR Process and timeframes



Actions

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

Characterisation Study

- As part of producing the NLPR we will be looking at undertaking a characterisation study. This may enable us to identify areas and opportunities for growth, as well as reinforce areas for protection.

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

- The Local Plan 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.
- We may look at the function of Employment Zones again as part of the NLPR and look for further opportunities to increase housing supply.

Actions

- **An Employment Land and Premises Study will be undertaken to consider the need for new office and industrial floorspace over the lifetime of the Plan. This will consider the long-term impact of the Covid-19 on the business sector, and how it may permanently change.**
- **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.**

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

- 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.

- The St Quintin and Woodlands Neighbourhood Plan is the second Neighbourhood Plan to pass a referendum successfully. Work has commenced to produce the Latimer Road Design Code SPD.
- 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.
- One of the actions of the Neighbourhood Plan has commenced which 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.**
- **Set up a project Group including Latimer Road Residents Association, the Neighbourhood Forum and business owners to bring forward a Design Code SPD for units 1-14 Latimer Road to promote appropriate mixed use development.**
- **Work has commenced with the project group, with points of wider consultation, to produce a draft Design Code SPD – August – October 2020 which aims to produce better design on mixed use office and residential uses.**
- **Working with project group, with points of wider consultation, to produce a draft Design Code SPD – August – October 2020**
- **The design SPD will set parameters for design and guide any new development and ensure consistency and quality.**
- **The indicative timeframe for adoption of the SPD is aimed for January 2021.**

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

The Council is a significant landowner in the borough and has started initial phasing to secure affordable homes on land in Council ownership. This will bring more affordable homes without the third party developers. The Council has secured planning permission for phase 1 of the New Homes Delivery Programme as outlined below:

Council's New Homes Delivery Programme (NHDP) - Phase 1

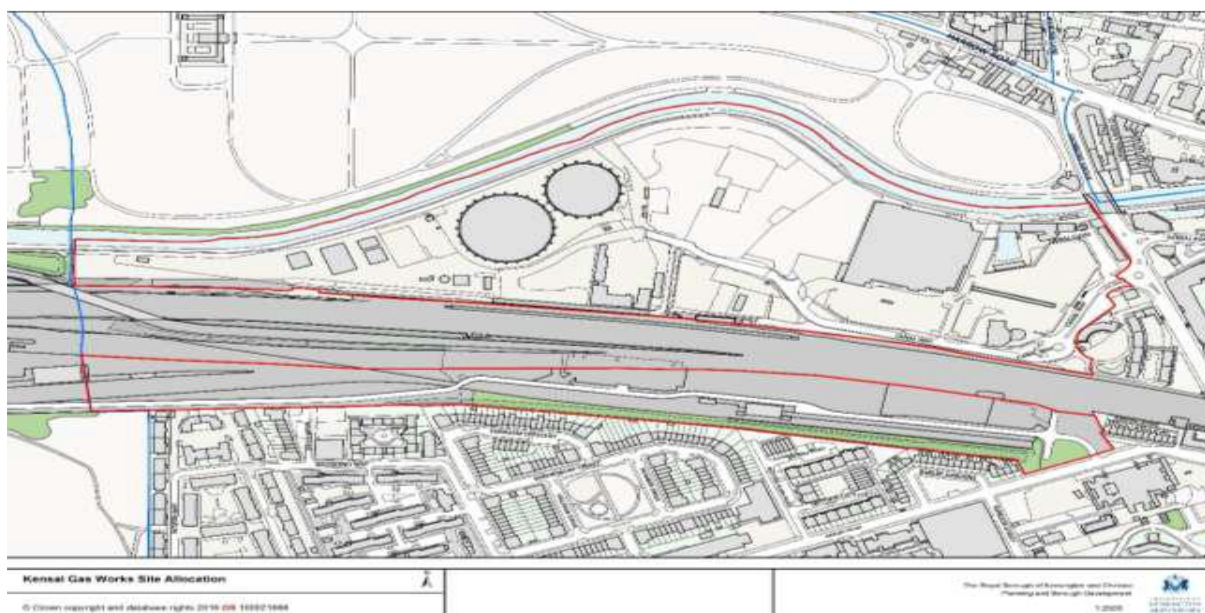
- The Council has resolved to grant planning permission subject to legal agreement for four individual sites comprising: Phase 1 of the New Homes Delivery Programme, which is a Council commitment to deliver 600 new homes, 300 of which are to be at social rent
- The grant of planning permission will see these four sites deliver a total of 97 new homes (96 net uplift) which includes 26 Market, 49 Social Rent, and 22 Discounted LLR.
- In habitable room terms this is a total 271 habitable rooms (67 market, 146 social rent, 58 discounted London Living Rent), a total of 75% affordable homes overall by habitable room.
- Work to implement and begin delivering these new homes will progress in early 2021.

Actions

- **Continue with the programme of delivery of new homes both market and affordable on Council owned land.**
- **Identify funding options for delivering more affordable homes.**
- **Widely consult residents, local stakeholders and other interested parties on any possible options.**

4. Prioritise the delivery of key sites

Kensal Canalside Opportunity Area



- 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.
- 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.
- The Growth and Delivery Team was set up to promote good growth through proactive planning and is responsible for major projects that focus on site delivery and good community engagement. This team are managing the delivery of the Kensal Canalside SPD. 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.

Progress and delivery timeframes

- Progress so far has been bringing forward an SPD for the site in close collaboration with the main landowners that promotes the delivery of a high quality, high density, new neighbourhood that deliver new homes and jobs for the local community, including a high proportion of Community Housing (Affordable Housing). The SPD will also promote the quick delivery of high quality schemes on the site.
- Early engagement on the site – engagement throughout 2019, including drop in sessions in March 2019, workshops and developer led site visits in July 2019 and two rounds of Built ID polls.
- Further engagement on potential SPD content – planned for September 2020
- Draft SPD November 2020
- Adopted SPD – March 2021

Earl's Court Opportunity Area

- The acquisition of Capco's interest in the site by Delancey (on behalf of Dutch pension fund APG) has resulted in a real opportunity to see this site

come forward. There is consensus that this needs to happen and there is political will to make it happen.

- We are delighted a new owner is on board with ambition to resolve and deliver this site.
- This site presents one of the few opportunities in the borough to deliver a significant amount of housing and affordable housing and therefore we welcome ECDC commitment to delivering development on this site.
- The developer will be bringing forward an entirely new masterplan, which we support, and will work closely with them to ensure it aligns with our priorities.
- The developer has appointed the principal masterplan architects for the site, Hawkins Brown and Studio Egret West which will be a 50/50 collaboration between the two architecture firms.
- We are continually engaging with Delancey and their team establishing relationships and keeping up to date on progress.
- We are currently making steps towards confirming a programme, or road map, from now to determination of a planning application.
- We will collaborate with LBHF and the GLA to ensure a joined up approach to this site, whilst ensuring the development meets the needs of RBKC and its residents and businesses.
- Priorities for RBKC are:
 - Residential led but genuinely mixed use development which significantly contributes towards meeting our housing needs
 - Delivery of on-site affordable housing
 - A significant replacement cultural facility
 - a site of this size must also deliver a mix of uses to meet the overall aims of the Council. We also expect to see employment, cultural uses and tangible economic benefits for the borough and its residents and businesses.
 - We support a highly sustainability and innovative solution
 - We will expect the developer to demonstrate exemplar community engagement and collaboration in drawing up their masterplan. It is vital the community are involved in the process at every step and involved in a meaningful way.

100/100A West Cromwell Road

- Planning permission was granted June 2020 for a total of 462 new homes including 186 affordable homes split between 109 at discounted London Living Rent and 77 social rent, delivering upon the Council's site allocation and aspirations for the site in the Local Plan

Heythrop College

- Planning permission was granted August 2020 for a total of 150 new homes on this vacant site, including 142 extra care residential dwellings, 2 market townhouses, and 5 discounted London Living Rent properties. Net increase of 106 homes given current (albeit vacant) student residential accommodation on the site (109 total at 2.5:1 ratio = 44).

Lots Road

- Proactively looking at site delivery and promoting relocation of some operational use. Promoting a Planning Framework approach to the Lots Road area where the Council has a number of land ownerships, in order to optimise delivery of new homes across the sites.
- Early engagement on Site Brief for main site (Lots Road South) and outline of wider Planning Framework – planned for October 2020
- Draft Planning Framework – December 2020 / January 2021
- Adoption – April 2021

Royal Brompton Hospital

- We are working to produce an SPD focusing on the retention of medical use on the site, recognising the need for enabling development and the opportunity for the delivery of an appropriate scale of new homes.
- Pre- engagement – planned for September 2020
- Draft SPD – October 2020
- Adoption December 2020

Newcombe House

- Planning permission was granted on 25 June 2020 at the Newcombe House site for proposals including 55 homes (resulting in a net increase of 35 homes). 23 of the 55 homes would be affordable. (Ref. PP/17/05782)

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

- Establishing a Development Forum where applicants for the largest applications will present their proposals to local residents and businesses at the earliest possible stage so they can feed into the process and the schemes can be amended to reflect the comments received where possible. By facilitating a process whereby developers engage the community early, we envisage schemes to better reflect their views and therefore they are more likely to be supported upon application.
- We are exploring the use of digital tools to allow people to visualise what developments will look like,
- We are working closely with all agents and developers to ensure their proposals meet the strategic aims of the borough through use of PPAs for all major development.
- We now have a Strategic Developments Team to redirect specific resources to dealing with the largest and most important sites for delivery of housing.
- We report on all major development at bi-weekly meetings with the Lead Member, including senior management. This ensures strategic oversight of all our major developments.

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.**

Barriers to delivery

5.2 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

6. Further Review of Planning Conditions

6.1 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.

6.2 Although not a fundamental barrier to housing delivery the Planning Department can review their approach to planning conditions including:

- 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.

7. Summary of Key Actions

- 1. Continue to progress and explore options to build more homes both market and affordable on land in Council ownership, whilst minimising impact on existing communities.**
- 2. Continue to progress the delivery of key sites such as Kensal Canalside and Earl's Court Opportunity Areas and other key sites.**
- 3. Progress the preparation and delivery of the NLPR to promote and facilitate the delivery of new homes.**
- 4. Promote intensification and mixed use development in the Borough's Employment Zones through preparation of the NLPR.**
- 5. Continue to work with Neighbourhood Forums and local landowners to deliver housing sites allocated in adopted Neighbourhood Plans**
- 6. Continue to improve communication with residents and communities, agents and developers to ensure effective identification of issues preventing permissions being translated into people's homes through adopted SCI process.**
- 7. Further Review of Planning Conditions to accelerate planning permissions being granted and speed up the delivery of new housing.**