

Gravesham Borough Council – Housing Delivery Action Plan August 2019

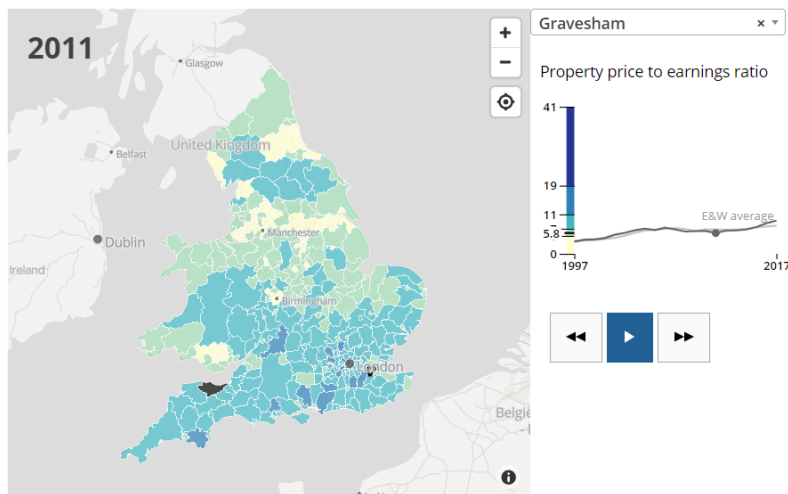
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Introduction

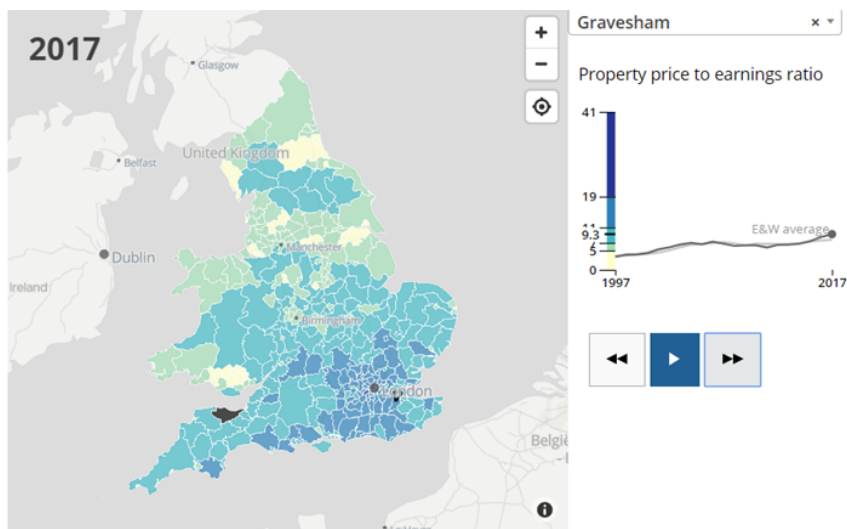
It is widely accepted that we are experiencing a national housing crisis. The lack of supply and pressure for new homes is felt most acutely in the South East of England, where demand is such that households are having to put ever greater shares of their income into housing costs. This is illustrated by ONS data, see Figure 1 and Figure 2, which illustrate the growing disparity between property prices and earnings. As time has progressed greater multiples of income are being put into housing illustrating that affordability in the South East is worsening, as well as in Gravesham. One of the main reasons for property prices increasing is due to supply being unable to keep pace with demand.

Figure 1: ONS House Price Statistics for England and Wales 2011



Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS

Figure 2: ONS House Price Statistics for England and Wales 2017



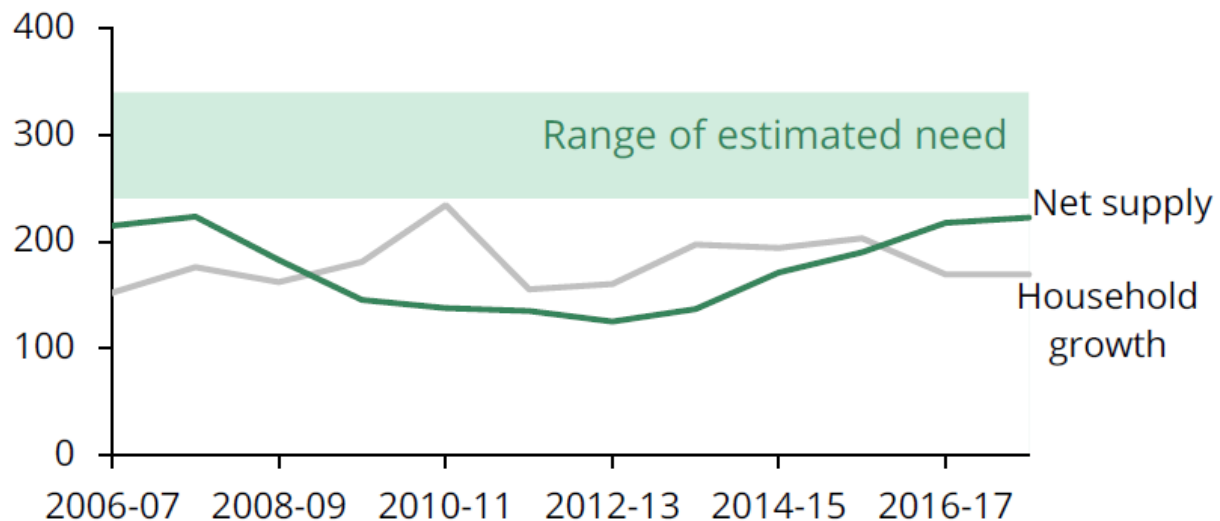
Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS

Successive Governments have recognised insufficient housing supply as a key issue facing the country, the current Government published its white paper on the issue, "Fixing our broken housing market" in February 2017. As part of the white paper, the then Prime Minister made it

clear that her Government wanted more homes built to slow the rise in house prices so that more families can afford to buy a home and to also bring down the cost of renting.

This objective to increase the number of new homes, is reflected in the revised National Planning Policy Framework (NPPF February 2019) and the introduction of the Housing Delivery Test. As illustrated in Figure 3 the supply of homes in England has consistently been below the range of estimated need and has until recently been lower than household growth.

Figure 3: Net housing supply, household growth and estimated homes needed (England)



Sources: MHCLG, Live Table 120; ONS, Household projections for England – 2018 based.

The National Planning Policy Framework (NPPF) requires local planning authorities to maintain a supply of deliverable sites sufficient to provide 5 years' worth of housing against their housing requirement. A Housing Delivery Test (HDT), measures net additional dwellings provided in a local planning authority area against the houses required. The consequences of failing the HDT are set out in the NPPF as being:

“Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years... (in addition) Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.. [From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.]”

All local planning authorities with a result of less than 95% of the delivery rate measured against housing completions for the preceding three years have six months to prepare an Action Plan. The Housing Delivery Test Result for Gravesham Borough Council was published by MHCLG on 19 February 2019. Gravesham Borough Council's 2018 measurement is 64% and in response to this, the Council has produced a Housing Delivery Action Plan.

The Action Plan is described in Planning Practice Guidance as being:

“A document produced by the local planning authority to reflect challenges and identify actions to address under-delivery against the housing requirement in the area. The document's purpose is to detail the reasons for under-delivery and the steps the authority intends to take in mitigation and drive up delivery in the area. A good action plan will identify ways to reduce the risk of further under-delivery and set out the case for measures to maintain or improve levels of delivery.”

By preparing an Action Plan, the Council is positively responding to the challenge of increasing its housing delivery. The Action Plan is intended to be a focussed document that identifies practical measures for improving local housing delivery and is informed by local evidence and research of key issues. Much of this local evidence and research will be published as part of the 2019 Authority Monitoring Report in December 2019.

This is Gravesham's first Action Plan and will be a living document that is updated at least annually.

Housing Delivery in Gravesham

Planning context

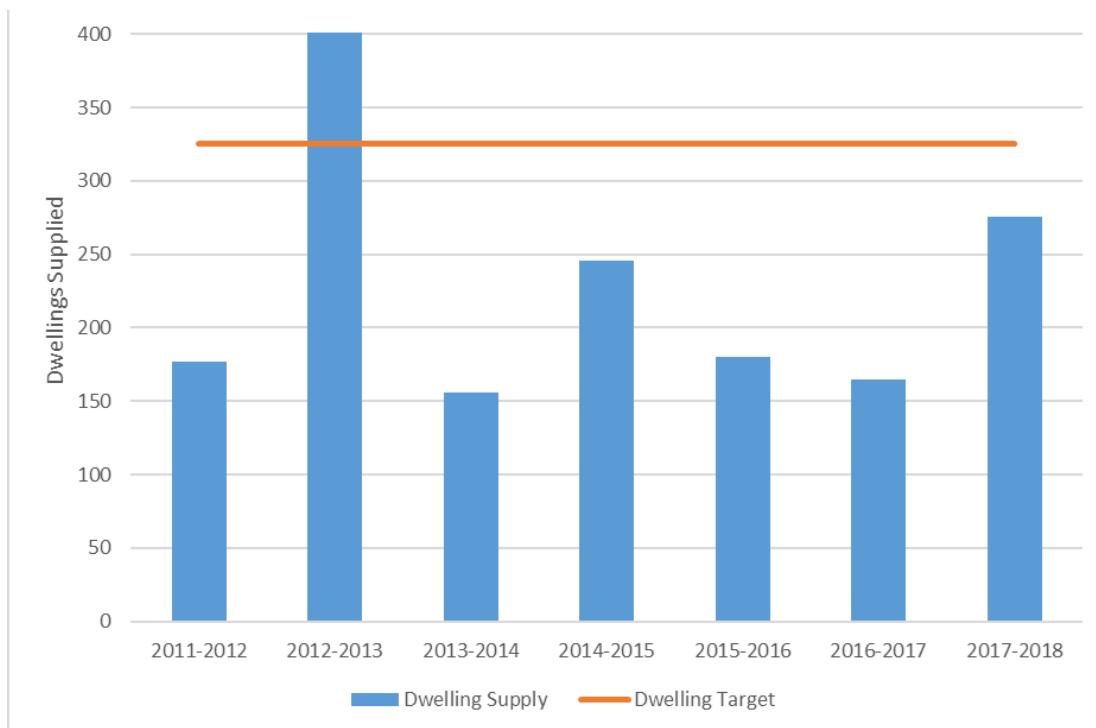
Local planning context including local plan status and approach to growth

The Development Plan for Gravesham consists of:

- Gravesham Local Plan Core Strategy (September 2014)
- Saved policies from the Gravesham Local Plan First Review (GLP 1st Review – adopted November 1994)
- Kent Minerals and Waste Local Plan 2013-2030 (adopted by Kent County Council in July 2016)
- South East Marine Plan (Currently under development by the Marine Management Organisation)

Strategic guidance related to how much development should be planned for in terms of housing is set out in the Gravesham Local Plan Core Strategy. The Core Strategy sets out the Council's long-term spatial vision for the Borough, the plan period extends from April 2011 to March 2028. The Borough's housing requirement for this period is identified as being for at least 6,170 homes, the Core Strategy also identifies the areas where major change is expected to take place and allocates Key Sites for development. Monitoring data from the Authority Monitoring Reports and Borough's Five Year Land Supply Statements, clearly shows that since 1st April 2011, the Borough has only met or exceeded the number of homes needed on one occasion (2012-2013), see Figure 4.

Figure 4: Net dwellings completed in Gravesham 2011-2018



The Local Plan Core Strategy prioritises development in the urban area as a sustainable location for development, to be achieved by:

- Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the opportunity areas of Northfleet Embankment and Swanscombe Peninsula East and Gravesham Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas;
- The continued development of a new, sustainable, mixed-use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;
- Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and
- Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including land at the Coldharbour Road Key Site.

In the rural area, development is supported within rural settlements inset from the Green Belt. Outside of those settlements development, including that for affordable housing and proposals to maintain and diversify the rural economy is supported where it is compatible with the Core Strategy and National Planning Policy Framework.

The adopted Core Strategy includes a proposal to undertake a Green Belt boundary review to identify additional land to meet the housing needs of the Borough and to safeguard land to meet development needs beyond the plan period whilst maintaining national and local planning purposes of the Green Belt. This piece of work forms part of the Local Plan Core Strategy partial review currently being undertaken.

In addition to the Local Plan Core Strategy partial review, the Council is preparing a Site Allocations and Development Management Policies document. Together with Duty to Cooperate discussions being undertaken with neighbouring authorities, these documents will allocate sufficient housing sites to meet the Borough's requirement going forward. A development capacity study being commissioned by the Council will consider what intensification opportunities are available within the Borough and this will, with more recent data, be utilised to update the 2018 Strategic Land Availability Assessment (SLAA).

Ebbsfleet Development Corporation

The Government recognised the significant growth challenge in North Kent and determined that a dedicated resource with significant financial support was needed. The Ebbsfleet Development Corporation was formed in early 2015 and took over responsibility for making decisions on planning applications in some parts of the Borough on 1 July 2015, see <https://www.gov.uk/government/organisations/ebbsfleet-development-corporation/about> .

The Government's explanation of the Ebbsfleet Development Corporation is:

To speed up delivery of up homes and jobs in North Kent through the creation of a 21st century garden city in North Kent. The stated aim of the EDC is to deliver up to 15,000 homes and 30,000 new jobs through working with local authorities and local communities to develop a shared vision for the area, providing high quality, attractive

and sustainably-constructed housing as well as opportunities to live and work. The EDC are also taking forward a core infrastructure investment programme that will deliver gas and electricity networks, telecoms, water services and the highways people need.

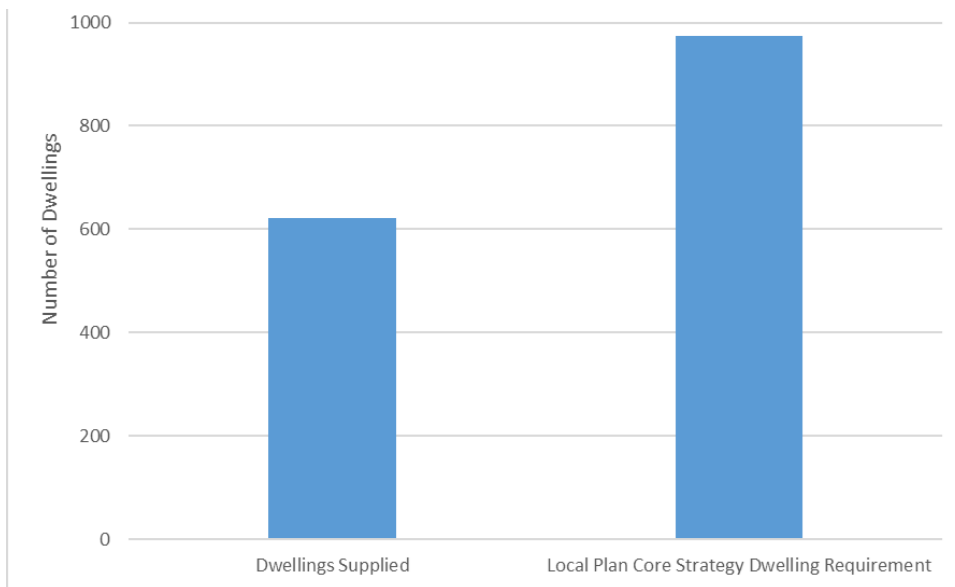
National context - The Letwin Review

As well as considering research undertaken at the local level it is also important to note the findings of the national Independent Review of Build Out Rates published by Rt Hon Sir Oliver Letwin (October 2018). This work explored the issue of build out rates of fully permitted planning applications on the largest sites in areas of high housing demand. It found that the similarity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such similar products, are fundamental drivers of the slow rate of build out. Therefore, it is important to consider opportunities for encouraging diversification of products to increase build out rates.

Housing Delivery Test Measurement and Five Year Land Supply

The Housing Delivery Test Measurement as published by MHCLG shows that over the preceding three years 1st April 2015 – 31st March 2018 only 64% of the dwellings needed in the Borough as set out in the Local Plan Core Strategy were delivered, this is illustrated by Figure 5.

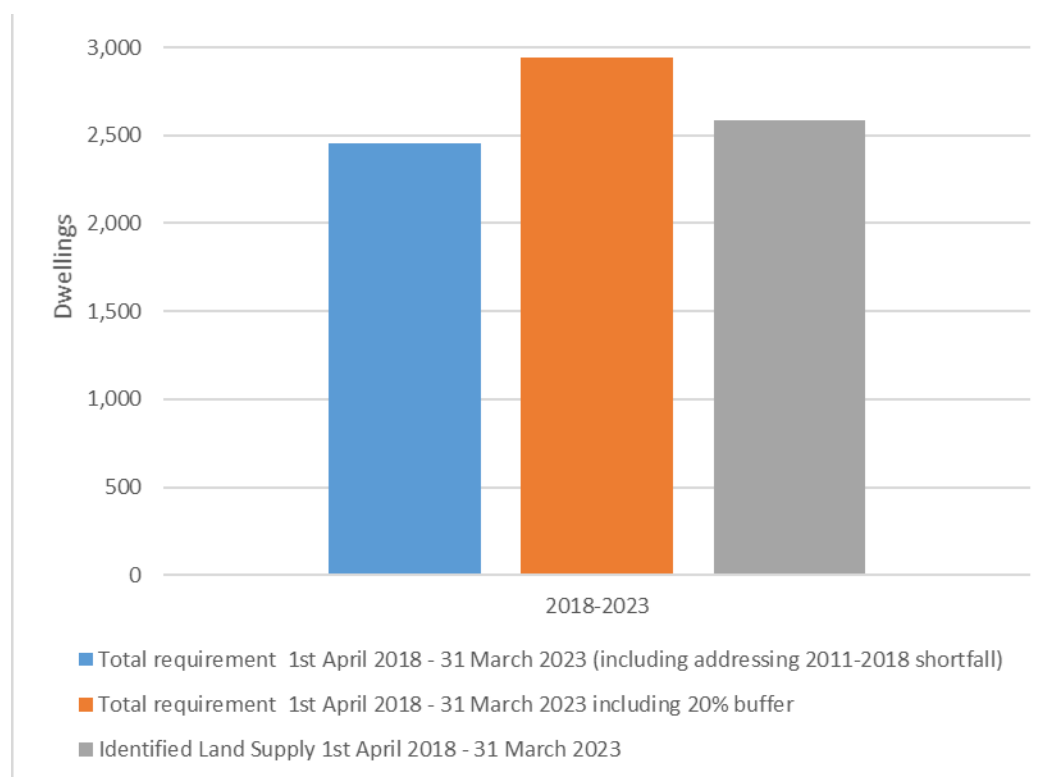
Figure 5: Dwellings supplied 2015–2018 compared with the Local Plan Core Strategy Dwelling Requirement for 2015-2018.



The Borough's most recent Five Year Land Supply Statement for 1st April 2018 – 31st March 2023 identifies a requirement to plan for 2,451 without a buffer, and 2,941 homes with a 20% buffer applied as required by the National Planning Policy Framework. Against this requirement the current identified land supply is only capable of delivering 2,585 homes, i.e. against a 5 year land supply requirement, the Council is only able to demonstrate a 4.39 year land supply, see

Figure 6.

Figure 6: Five Year Land Supply – 1st April 2018 – 31st March 2023



Land Supply to 2028

The 2018 SLAA identified 159 sites, which are deliverable for housing within the remaining plan period, these sites are identified as having the potential to deliver 4,719 homes. The vast majority of these, 99% with a capacity of 4,679 dwellings, are expected to come forward from sites within the urban area, with only a limited number, 1% with a capacity of 40 dwellings, expected to come forward from the rural area.

The SLAA estimates that 198 windfall units on sites of 4 or less dwellings, will come forward between 2022/3 and 2027/8, an average of 33 dwellings per year. It estimates that 330 windfall units on sites of 5 or more dwellings, will come forward between 2017/18 and 2027/28, an average of 30 dwellings per year.

The SLAA contains a Set-aside and Undeliverable Sites Portfolio currently consisting of 82 sites in the Green Belt which have been put forward to the Council for development but which have been set aside on policy or other technical grounds. The SLAA recognises that additional sites will need to be identified and set-aside and undeliverable sites will need to be reconsidered further to ensure that the Council is able to meet its OAN. We maintain an open call for sites process which means that site promoters are able to make us aware of their proposals and promote their sites for development at any time. All sites will be assessed further as part of the plan making process which includes a partial review of the Local Plan Core Strategy and work being undertaken on the Site Allocations and Development Management Policies document.

An analysis of the size of sites which contribute to the anticipated future housing supply from 1 April 2017 to 31 March 2028 in the SLAA is illustrated in Figure 7, Figure 8 and

Figure 9. This is based upon the Deliverable Sites Portfolio table of the 2018 SLAA. It shows that 93% of dwellings are on major development sites, which are defined by the NPPF as having a capacity of ten or more dwellings. 80% are on sites with a capacity of 100 dwellings or more. Only 7% of dwellings are on small sites of between 1 and 9 dwellings.

Figure 7: 2018 SLAA – Number of sites by scale of site in terms of dwellings 2017-2028

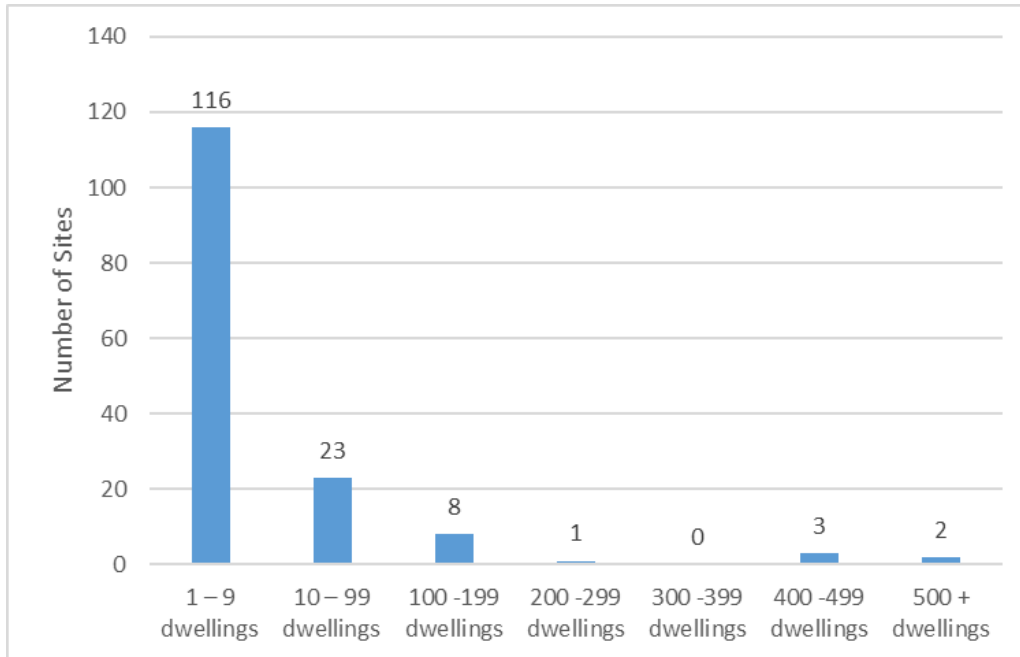


Figure 8: 2018 SLAA - Number of Dwellings by scale of site in terms of dwellings 2017-2028

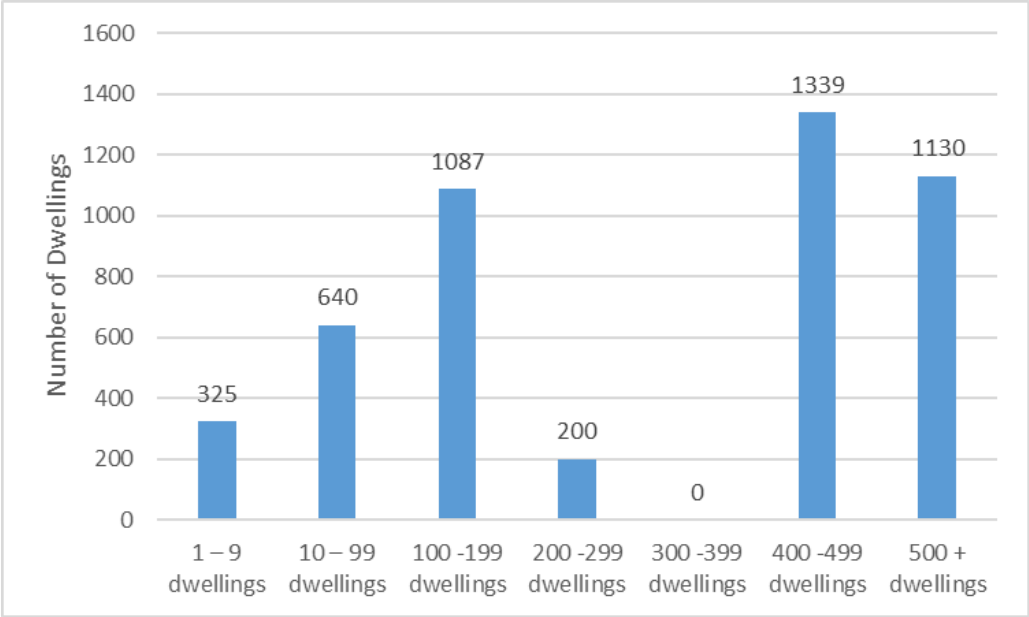
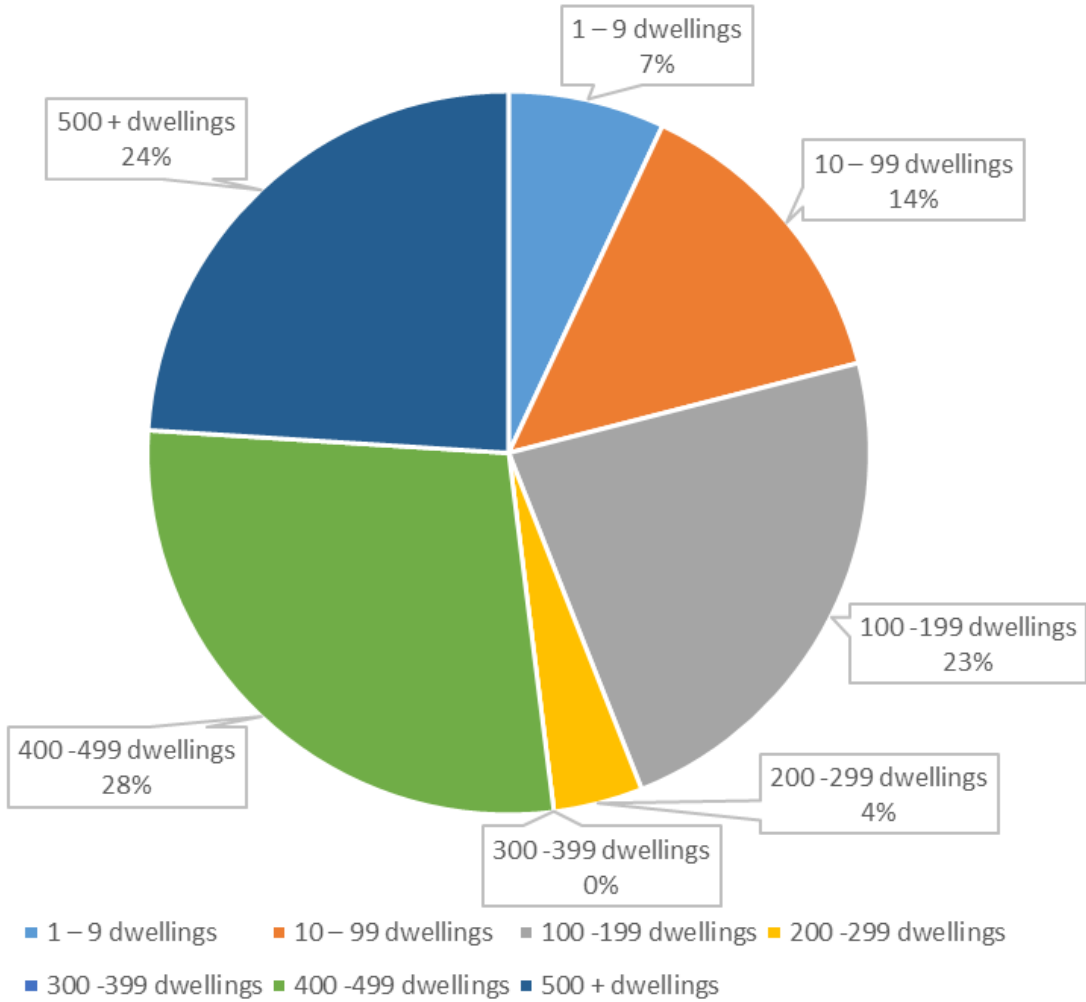


Figure 9: 2018 SLAA – Percentage of dwellings coming forward by scale of site in terms of dwellings 2017-2028

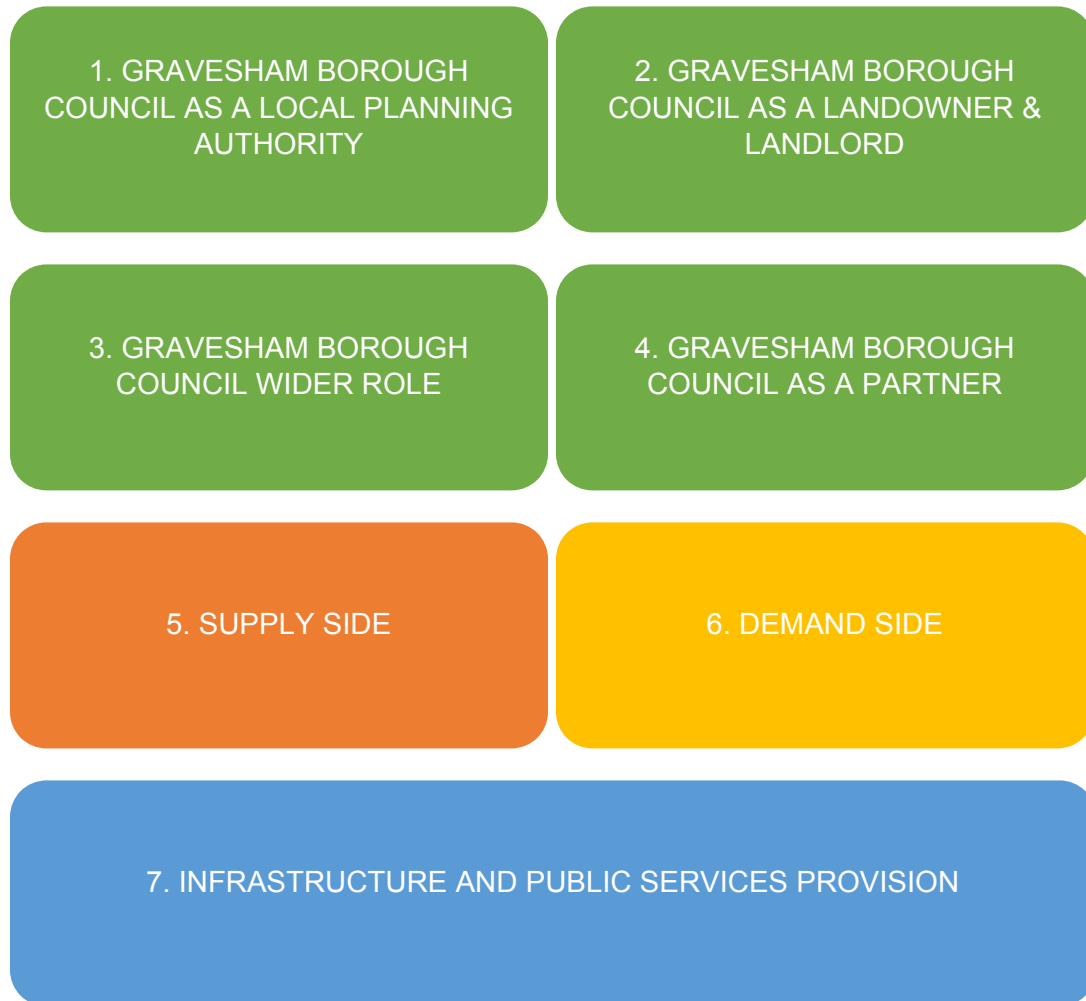
% of total dwellings



What are we going to do to ensure more homes are built within Gravesham?

The Council has a number of responsibilities, many of which can directly influence how many homes are built locally, as illustrated in Figure 10.

Figure 10: Understanding the Council's role and key factors influencing and driving low rates of housing delivery.



1. Gravesham Borough Council as a Local Planning Authority

The Borough Council is the plan making authority for Gravesham, however in terms of decision taking for planning applications the responsibility is split between the Council and Ebbsfleet Development Corporation. The area for which the Ebbsfleet Development Corporation is responsible for is set out at <https://ebbsfleetdc.org.uk/planning/development-area/> and includes parts of Dartford Borough.

In terms of plan making, the Borough Council is progressing work on a Local Plan Core Strategy Partial Review and a Site Allocations and Development Management Policies Document. This

will contribute towards boosting local housing delivery by providing a greater mix of sites to assist developers in delivering the right sizes, types and tenure of homes in the Borough. Through this work the Council will respond to issues identified by the Letwin Review and make provision for Self and Custom build housing in the Borough.

Current Local Plan Core Strategy policies being reviewed that will assist in boosting housing and economic development in the Borough include:

- Policy CS02: Scale and Distribution of Development
- Policy CS07: Economy, Employment and Skills
- Policy CS08: Retail, Leisure and the Hierarchy of Centres

The Council's Planning Policy team is working proactively with stakeholders such as the local community, developers and partners to ensure that this work is completed by 2021. This will allow the Council to adopt a revised Local Plan Core Strategy together with a Site Allocations and Development Management Policies document during 2021.

As part of the evidence that underpins Local Plan monitoring and the evidence needed to support the Local Plan Core Strategy partial review, the Council monitors when development is implemented and when it is completed. This data has shown that, at times, there is a significant lag between when permission is granted and when development begins on site. This is a very important factor to understand and counter. To address these issues the Council has set up a 'Development Sites Implementation Group', the objective of this group is to identify any barriers to delivery and to work with developers, landowners and other departments within the Council to overcome barriers that may exist to bring sites forward for development.

One of the key pieces of evidence being commissioned to underpin the Local Plan Core Strategy partial review and the Site Allocations and Development Management Policies document going forward, is a Development Capacity Study. This study will identify the potential for intensification of the density of development, identify additional possible development sites within the Borough and assist the Council in promoting these for development. It will also assist the Council in improving our understanding why development on some sites, such as sites allocated within the Local Plan Core Strategy, has been slow to come forward.

The responsibility for effective decision taking in terms of Development Management is split within the Borough as advised earlier and whilst the Borough Council works effectively with colleagues in the Ebbsfleet Development Corporation, this Action Plan does not cover the Corporation. In terms of Development Management, Planning Agents, Developers and Landowners have raised concerns regarding the length of time it can take for decisions to be made. The speed of decision taking is influenced by a number of factors, these include the quality of applications received by the Council, resources available internally, performance of IT infrastructure and software, effectiveness of officers, etc. A number of actions have been undertaken internally to improve performance and this is reflected in the improving feedback received and demonstrated through the backlog of applications reducing.

However, the Council is acutely aware that more can be done in this area. Some of the actions currently being undertaken to improve the service further include:

- Developing a local validation list

- Developing an accredited agent scheme to foster good working relations between the council and planning agents and to promote the quality planning submissions
- Continually reviewing the use of planning conditions to ensure:
 - Number of conditions used is minimised (at same time recognising that very often conditions are imposed due to a reluctance from developers to submit information prior to a planning application being determined, because the submission of information will be a cost to the developer with no guarantee that permission will be granted)
 - Use of pre-commencement conditions is reduced,
 - Delays in processing discharge applications is minimised, and
 - Producing standard list of planning conditions which are transparent to applicants, agents, Members and public
- Making the Planning Obligations process more transparent
- Keeping the backlog of applications to a minimum – it is recognised that due to unforeseen difficulties there may always be some applications that are not dealt with within the set or agreed time limits
- Improve information disseminated through the Council's website
- Investigating whether text message updates used for licensing can be extended to planning applications – multiple benefits to customer and the Council.
- Addressing data quality within and functioning of the current planning system used by the Council
- Maintaining a fully resourced and skilled workforce
- Having a realistic and flexible approach to tenure mix to accelerate delivery

Examples of measures already taken in terms of Development Management include:

- Investment in Information Communication Technology
 - much of the planning application process is paperless. Multiple benefits for Council and the environment
 - flexible working enabled
 - devices can be taken on site to enable pictures to be taken and plans to be checked without need for paper
- Introduced Planning Performance Agreements to direct and tailor resources for determining potentially more complex applications, covering all aspects of the planning process from the pre-application stage to the discharging of conditions.
- A re-freshed pre-application advice service which explicitly advises the resource to be provided for each service level. Includes addition of concept pre-application advice when the principle of a particular type or form of development is proposed.
- Make greater use of the Design Review Panel, which calls on industry experts to provide high quality design advice to developers
- Reduced need for delegated reports – follow focused report style, which had been highlighted as best practice, so that reasons for permission are included on householder applications that are permitted under delegated powers

2. Gravesham Borough Council as a landowner and landlord

Gravesham Borough Council has limited land assets, the Council's main land holdings outside of its housing stock are primarily focused in and around Gravesend town centre. The Council is

actively working on bringing forward development at Heritage Quarter and at the former Lord Street Car Park. Alongside these larger schemes, the Council has successfully delivered homes on a number of smaller sites within the Borough. Work is being undertaken by the Council's Housing Strategy and Development team to bring forward affordable housing at a number of sites including:

- St Hilda's
- St Patricks Gardens
- Valley Drive
- Whitehill Lane

The Council is also exploring opportunities that maybe available to increase housebuilding rates through partnership working or other delivery vehicles

Other public sector landowners in Gravesham are Kent County Council, Ebbsfleet Development Corporation, and Homes England. It should be noted that different organisations have different approaches to their land assets and potential disposal strategies.

As a stock owning authority, some the Council's most extensive land assets are located in Council estates. Where opportunities arise for redevelopment or intensification the Council considers these and the benefits this will bring to new and existing residents. At present, the Council is investigating what further opportunities may exist within its existing portfolio of sites.

3. Gravesham Borough Council's wider role

The Council recognises that it has a significant role in bringing forward growth in the Borough, this is not limited to just housing but also encompasses commercial and leisure floor space. The Council will seek to build upon work that has already been undertaken by prioritising its own and seeking external investment into the Borough. Harnessing the benefits of growth locally cuts across many of the Council's corporate objectives. Therefore the Council will seek establish a culture of embracing growth locally coupled with good place-making, this approach together with working with local communities to embrace growth should foster a more positive 'can-do' and therefore 'can-build' approach to housing. This will have the added positive benefits of encouraging greater positive participation and a holistic approach to development and the planning system.

It is recognised that there is a negative perception of some parts of Gravesham, this can deter people or businesses looking to relocate to the area. Even though Gravesham has good connections, river, character and accessibility to services. Many people's perception is still dominated by the Borough's industrial past rather than its dynamic and changing present.

Whilst the Council is currently leading on the regeneration of the town centre, we are acutely aware of the need to stimulate demand through more effective placemaking and marketing of the area. The Council will seek to place a greater emphasis on proactively marketing the Borough and potential developments via undertaking a more coordinated and corporate approach to promotion. This will occur alongside setting out a clearer vision for the Borough and key development locations so that locals and investors have greater clarity regarding the Council's ambitions for the Borough.

Whilst the Council has not recently utilised its compulsory purchase powers, going forward the Council will consider the potential for positive intervention in the housing market where it would speed up the delivery of housing. The Council acknowledges that many brownfield sites have taken some time to come forward. Whilst some are now being brought forward, a small number of sites have not moved forward for some time. To overcome this, the Council will seek to identify suitable approaches to intervention and work with development partners to deliver much needed development in the Borough.

Recent changes by Government (the Localism Act 2012) now means that Councils such as Gravesham can establish their own local housing companies. Going forward, the Council will consider whether or not such a company should be established to maximise housing delivery of all tenures outside of the Housing Revenue Account. Undertaking such an approach would allow the Council to help plug gaps in the local housing market and increase the delivery of affordable homes and homes for older people as well as providing good quality homes for wider residents.

4. Gravesham Borough Council as a partner

The Council recognises that it cannot deliver development alone and it actively works with neighbouring authorities, the Ebbsfleet Development Corporation and Kent County Council to explore and establish closer working relationships and to jointly progress projects that are of mutual benefit.

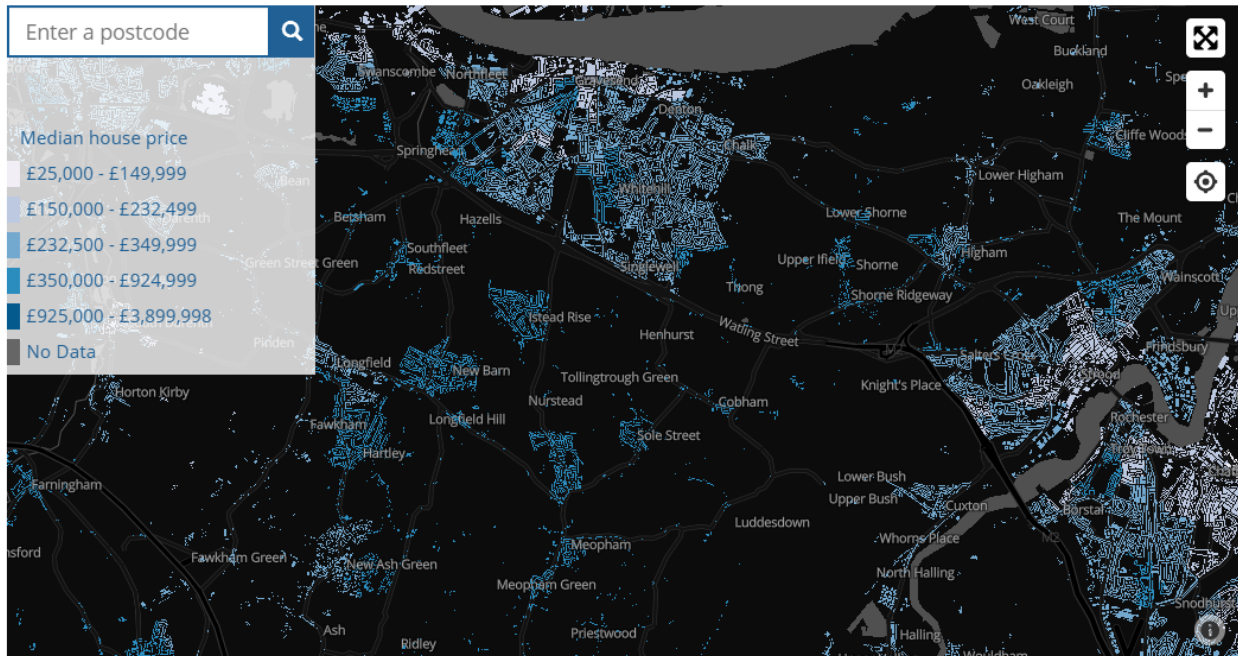
The Council will continue to monitor and bid for infrastructure and development funding as and when opportunities arise. The Council has and will continue to engage Homes England to bring forward complex brownfield sites in the Borough, and the Council will continue to explore and engage appropriate bodies and Government to help realise its current ambitions for the Borough for the benefit of local residents.

5. Supply side issues

The current land supply does rely upon a small number of large sites to deliver a large number of homes. The 2018 SLAA identifies that 37 sites providing 10 or more dwellings will deliver 4,396 homes, compared to 325 homes being delivered on 116 sites of 9 dwellings or less. These large sites are within the urban area of Gravesend and Northfleet and predominantly on brownfield land e.g. Northfleet Embankment East, Northfleet Embankment West, Canal Basin, Heritage Quarter, Lord Street, former Gravesend Police Station, former Maternity Block, Clifton Slipways.

As illustrated in Figure 11, the bulk of these sites fall within areas of Gravesham where the property prices are unproven due to lack of sales or are in areas where the median house price is relatively lower when compared to other parts of the urban area and the rural part of the Borough.

Figure 11: ONS Median House Price (accessed August 2019)



Source: Office for National Statistics - House Price Statistics for Small Areas, HM Land Registry - Price Paid Data

A range of organisations are involved in the early stages of the development process including landowners, investors, occupiers, developers, lenders, architects, engineers, surveyors, planners and real estate agents. The process does not take place in a vacuum; it is affected by and contributes to changes in social trends, economic conditions and the regulatory environment

Developing houses is often a complex process. There are a number of challenges and barriers to overcome before a buyer can take ownership of a property. Many of these barriers are economic in nature, for example access to finance for both developers and potential house buyers, whilst others may be more site-specific such as land contamination. These barriers affect both the supply and demand side of housing delivery. The following provides a brief summary of the key challenges associated with bringing housing development forward in general. It should be noted that the barriers will range from site to site and are dependent, to an extent on the size or nature of a developer.

RESOURCES	FINANCIAL
<ul style="list-style-type: none"> • Skills and labour availability • Shortage of materials • Availability of sites • Availability of developers and registered providers to deliver housing 	<ul style="list-style-type: none"> • Land value expectations • Access to finance for developers/registered providers • Access to finance for potential home owners • Cash flow and interest payments • Grant / loan funding from Homes England • Strength of market – investor confidence • The price the land was bought for

	compared with its value today
SITE SPECIFIC CONSTRAINTS	INFRASTRUCTURE CONTRIBUTIONS
<ul style="list-style-type: none"> • Land contamination • Complexity of land ownerships and 'ransom' situations • Access arrangements • Landscape • Flood risk, drainage and utilities • Archaeology • Wildlife and nature • Heritage assets (e.g. listed buildings) • Local opposition • Legal (e.g. covenants) 	<ul style="list-style-type: none"> • Affordable housing • Health contributions • Open space • Drainage schemes • Housing mix • Education contributions • Highway improvements • Other infrastructure requirements

Any number of these issues can negatively influence the financial viability of a development. In some cases causing long delays, because local effective demand is not able to overcome these supply-side constraints. Put simply the amount local people are prepared to pay does not give the return needed by the developer, to develop the site. To overcome this, the Council will work proactively with local stakeholders via the 'Development Sites Implementation Group' to address where practicable, the impediments to delivery.

Whilst many of these issues are primarily the responsibility of the promoter / developer, a number of the actions highlighted in this action plan will assist:

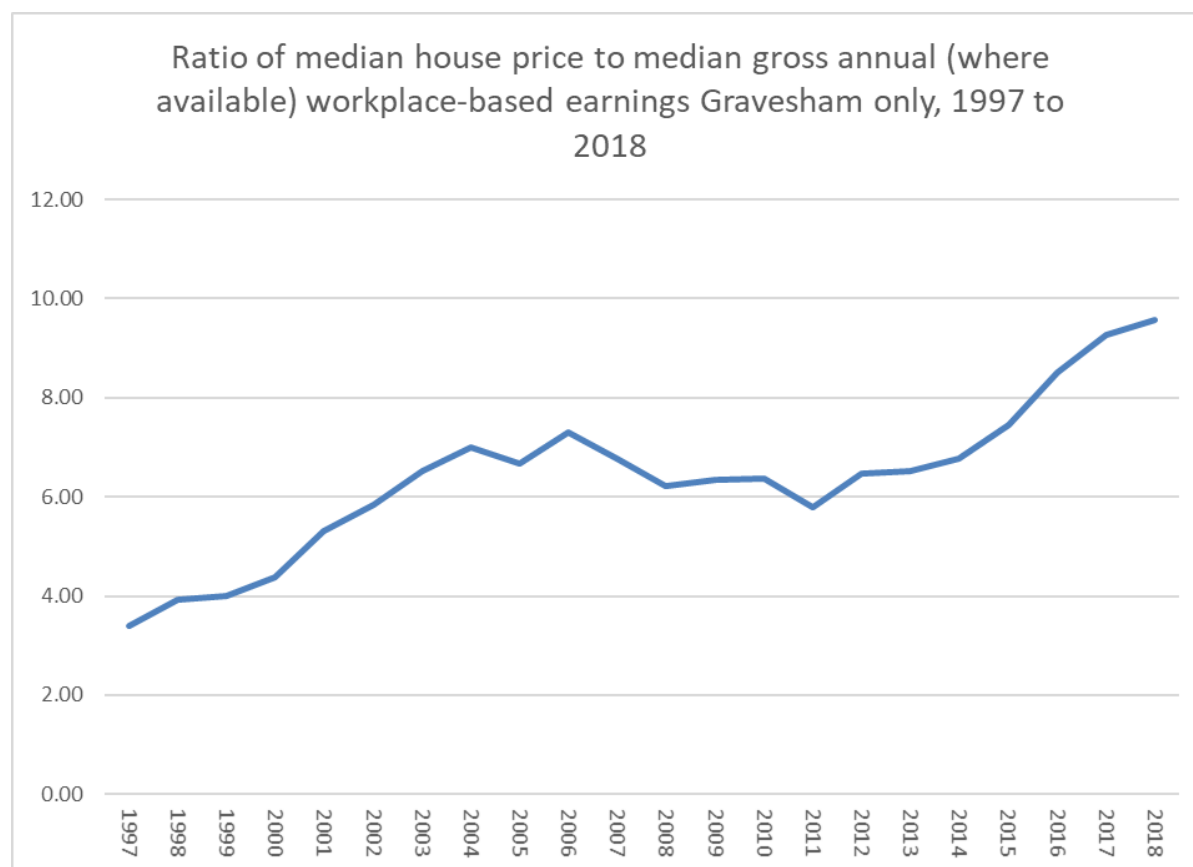
- Greater scrutiny of sites at plan making stage including clarity about lead in periods for sites with constraints
- Allocation of additional sites, not just minimum requirement
- Re-freshed pre-application advice service
- Development Sites Implementation Group
- Strict application of the validation list requirements will assist in identifying problems and their solutions in the pre-submission stage

6. Demand side issues

Population and household projections, coupled with evidence gathered through the Strategic Housing Market Assessments and the Rural Housing Needs Assessments, all identify that there is significant need for new homes in the Borough. Such data when reviewed against the Council's waiting list and national statistics also shows that there is an affordability issue. Wages have not kept up with house price growth and over time more and more people have either been priced out of the housing market or they have had to utilise a greater portion of their income on housing costs. Local affordability is illustrated in Figure 12, slow rates of building on some sites (e.g. land at Coldharbour Road) and a clear lack of progress on others (e.g. Canal Basin) means reduced housing delivery in the Borough and inevitably higher property prices.

Through the plan making process the Council will seek to ensure that policies are put in place that guide developers to deliver the right size and type of homes in the Borough, and the homes that meet local needs.

Figure 12: Ratio of median house price to median gross annual workplace based earning Gravesham only



7. Infrastructure and Public Services Provision

The Local Plan was produced and supported by an Infrastructure Delivery Schedule (IDP). The IDP has been developed with input from utility providers and service providers and identifies the improvement to existing or new infrastructure required to support the planned growth of the Local Plan. Since its creation the Ebbsfleet Development Corporation has also taken on a lead roll in ensuring suitable infrastructure is put into place within the Garden City.

The Council has considered whether the current provision of infrastructure in the Borough is acting as a barrier for the delivery of new homes. For the current planning permissions in place, there are no infrastructure barriers preventing the commencement of sites.

There are examples in the Borough of infrastructure that was to be delivered as part of a development site but subsequently found to be undeliverable due to viability issues. Largest of these was the bridge linking Springhead Quarter to Ebbsfleet Station. The developer had agreed a significant package of transport infrastructure when the initial outline permission was given for the development at Ebbsfleet. More detailed viability work on a phase by phase basis identified that some of the infrastructure such as the bridge could not be paid for by the development. The Ebbsfleet Development Corporation have addressed this by forward funding infrastructure and that has enabled infrastructure such as the Springhead Link Bridge to be funded.

The investment being made in the Garden City however cannot be easily replicated elsewhere, primarily because the Government directly funds the Ebbsfleet Development Corporation to bring forward development in the Garden City. Similar funding is not made available to the Council to bring forward infrastructure and address service shortfalls in other parts of the Borough. Concerns regarding the capacity of infrastructure such as the highway network, water and waste resources and the capacity of services such as health care are at the forefront of local residents concerns.

Recent growth has not been complemented by suitable investments in local infrastructure and services, as funding opportunities became and remain limited. The inability of developers to adequately fund local infrastructure and public services harms local perception of new development. The Council has engaged with the Government to bring forward changes to the Planning Obligations regime and changes being introduced later this year will contribute towards improving the current state of affairs. However, there is a recognition that further investments need to be made into local infrastructure, and the Council will continue to work with partners to identify and bid for funding that enhances local provision in terms of both infrastructure and services.

Conclusion

The only way to meet the test is enhanced delivery and as highlighted above the Council continues to undertake a range of actions related to its various roles. These actions are summarised in the form of a work programme at Appendix A.

At the same time, the text is inherently backward looking with paragraph 215 of the NPPF defining the thresholds substantially below the housing requirement as:

- a) November 2018 indicate that delivery was below 25% of housing required over the previous three years;
 - Considering 3 year period from 1/4/2015-31/3/2018
- b) November 2019 indicate that delivery was below 45% of housing required over the previous three years;
 - Considering 3 year period from 1/4/2016-31/3/2019
- c) November 2020 and in subsequent years indicate that delivery was below 75% of housing required over the previous three years.
 - Considering 3 year period from 1/4/2017-31/3/2020

Therefore when this Action Plan is published in Summer 2019, only 8 months will remain of the final monitoring period.

Fortunately the Council has, for a variety of reasons, already been delivering actions and interventions within the scope of its ability to increase delivery.

Appendix A: Work Programme

This is a living document will evolve and be refined over time.

1. GRAVESHAM BOROUGH COUNCIL AS A LOCAL PLANNING AUTHORITY			
Lead	Action / Aim	Timeframe	Performance Measure
Planning Policy	Progressing work on the LPCS Partial Review and Site Allocations and Development Management Policies Document	Regulation 18 Stage 2 Consultation: Jan-Feb 2020, Regulation 19 Consultation: Sep-Oct 2020, Submission: Feb 2021, Adoption: Dec 2021.	Adoption of Local Plan Partial Review and Site Allocations and Development Management Policies document in line with Local Development Scheme
Development Management	Developing a local validation list	Consult on Validation List is late 2019, adopt Validation List in early 2020	Sustained reduction in applications backlog PS1 and PS2 returns performance Increased public use of Council's website in terms of web metrics and a corresponding decrease in public telephone inquiries, in areas where information available on line.
	Developing an accredited agent scheme	By July 2020	
	Continually review the appropriateness of planning conditions	Ongoing	
	Increase the transparency of the planning obligations process	By July 2020	
	Reduce backlog of planning applications and keep to a minimum thereafter	April 2020 – then on-going	
	Review and improve information disseminated through the Council's website	By July 2020	
	Address data quality	Ongoing	
	More effective use of IT	Ongoing	
	Maintaining a fully	Ongoing	

	resourced and skilled workforce		
Development Sites Implementation Group	<p>1. Identify barriers to delivery.</p> <p>2 to work with developers, landowners and other departments within the Council to ensure that the Council has done everything reasonable it can do to overcome these barriers.</p> <p>3. to identify areas that other bodies will need to investigate to overcome remaining barriers..</p>	Ongoing	Implementation, progression and development on major sites
2. GRAVESHAM BOROUGH COUNCIL AS A LANDOWNER & LANDLORD			
Housing Strategy and Development	Bring forward affordable housing at a number of sites i.e. Albert Murray Close, Arnold Avenue, Barr Road, Constable Road / Rembrandt Drive, Mark Square Garages St Hilda's, St Patricks Gardens, Valley, Drive, Whitehill Road, Wilberforce Way.	Ongoing	Residential completions 2020-2025
Housing / Housing Strategy and Development	Review housing stock to identify opportunities for intensification.	Ongoing	Identification of additional development / redevelopment opportunities
Corporate Services	Consider the merits of creating an a Local Authority Trading Company (LATCO)	March 2020	Creation of LATCO 2020/21 (subject to outcome of review)

	to increase housebuilding rates		
3. GRAVESHAM BOROUGH COUNCIL WIDER ROLE			
Planning Policy / Development Management	<p>1. Improve the public's understanding of the planning system, the role of the NPPF, and the part the Council has in shaping development.</p> <p>2 increase the public's participation in the plan making process, subsequently fostering a greater sense of ownership</p>	Ongoing	Reduced complaints and more useful interactions with the public.
Communities / Planning Policy / Communications	Through more effective placemaking and marketing of the Borough, to promote a clearer vision for the Borough and key development locations	Ongoing	<p>Land value uplift</p> <p>Reduced Town Centre vacancy rates</p> <p>% of planning permissions implemented</p> <p>Improvements to headline estimates of personal well-being from the Annual Population Survey</p> <p>Improved average earnings</p>
Housing and Regeneration	Identify opportunities for greater involvement in site assembly and delivery	Ongoing	Reduction in stalled sites and development of Opportunity Areas and Key Sites allocated in Local Plan

			Core Strategy
4. GRAVESHAM BOROUGH COUNCIL AS A PARTNER			
Housing and Regeneration / Corporate Services	Identify and bid for funding to deliver the development and infrastructure, needed in the Borough	Ongoing	External funding received directly / indirectly e.g. delivery of infrastructure by partners
5. SUPPLY SIDE			
Development Sites Implementation Group	Work with stakeholders and developers, looking to identify and overcome, where practicable, impediments to delivery. Reducing the time between permission and build.	Ongoing	Increased development delivery rates, and progress on stalled sites.
Development Management / Planning Policy	Ensure schemes are deliverable and developable during both plan making and decision making stages; Allocate sufficient sites to provide greater choice for developers; Enhanced pre-application service; Implementation of validation list	Ongoing	Increased development delivery rates
6. DEMAND SIDE			
Economic Development	1. Work to stimulate the local economy and to improve incomes in the borough, directly through a review of GBC's economic	Ongoing	Improved Gross Value Added and Average Income Levels compared to present. Housing affordability being

	<p>development offering and through our SELEP and KMEP membership and activity.</p> <p>2. Based on concerns raised by residents and members, the Council is also working with partners, identifying opportunities for improving infrastructure and service provision. This includes exploring other avenues of funding.</p>		more comparable to nearest neighbours and improving
7. INFRASTRUCTURE AND PUBLIC SERVICES PROVISION			
Housing and Regeneration / Communities	Work with partners to identify and bid for funding that enhances local provision in terms of both infrastructure and services	Ongoing	Success rate in obtaining grant funding