

Housing Delivery Action Plan

Guildford Borough Council

2020

Draft

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1. Introduction

- 1.1 This Housing Delivery: Action Plan (Action Plan) highlights areas that are likely to be influencing (and have influenced) the rate of housing delivery in Guildford borough. The Action Plan formulates a response to this context, focusing on areas within Guildford Borough Council's (GBC's) control that address the factors that have contributed to historic under-delivery in the borough.
- 1.2 Government has identified the lack of sufficient housing delivery as a significant issue and outlined its intent to hold local planning authorities (LPAs) to account for the number of new homes delivered through the introduction of a 'Housing Delivery Test' (HDT). In summary, the HDT¹ compares the net homes delivered over the preceding three years to the homes that should have been built over the same period (the housing requirement) – see Appendix 1.
- 1.3 The National Planning Policy Framework (2019) (NPPF) and Planning Practice Guidance (PPG)² set out the consequences of failing the HDT, which apply until Test results demonstrate that delivery has recovered in subsequent years or a new requirement is adopted. The consequences include:
 - a. the publication of an action plan if housing delivery falls below 95%;
 - b. a 20% buffer³ on a local planning authority's 5-year land supply if housing delivery falls below 85%; and
 - c. (application of) the (NPPF) presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended (i.e. from the day following the publication of the 2020 Housing Delivery Test).
- 1.4 Government published the Housing Delivery Test: 2019 measurement on 13 February 2020. This comprises the most recent HDT result. The 2019 HDT measurement for GBC is 83% of its housing requirement over the three previous years⁴. The 2018 HDT measurement for GBC was 75% of its housing requirement over the previous three years⁵.
- 1.5 GBC is therefore required to produce an action plan in line with paragraph 75 of the (NPPF) and consider government guidance on Action Plans (see Appendix 2).
- 1.6 The NPPF indicates that the action plan should assess the causes of under-delivery and identify actions to increase delivery in future years.

¹ See also [MHCLG, 2018 Housing Delivery Test Measurement Rule Book](#) and [Housing Delivery Test: 2018 Measurement Technical note](#), which reflect the calculation method for the HDT.

² See PPG: Housing and economic land availability assessment. Paragraph: 062.

³ Note: the requirement for a 20% buffer was addressed by the Inspector through the Guildford borough Local Plan: Strategy and Sites, 2015 - 2034 (the Local Plan) examination process and the five year supply calculation supporting the Local Plan includes a 20% buffer for past persistent under-delivery.

⁴ See [Housing Delivery Test: 2019 measurement](#).

⁵ See [Housing Delivery Test: 2018 measurement](#).

2. GBC Planning policy context

- 2.1 Prior to the adoption of the Guildford borough Local Plan: Strategy and Sites (2015 – 2034) (the Local Plan) and to the publication of the HDT results in February 2019, GBC did not have a 5-year supply of deliverable sites.
- 2.2 Rather, the borough was considered to have a record of persistent under-delivery of housing. This has contributed to affordability issues.
- 2.3 There are a number of constraints that needed to be taken into account in seeking to accommodate housing need within the Local Plan, including:
 - a. The Thames Basin Heaths Special Protection Area (SPA), which covers northern parts of the borough,
 - b. The Surrey Hills Area of Outstanding Natural Beauty (AONB), which covers the southern half of the borough,
 - c. The Metropolitan Green Belt, which covers a significant proportion of the borough,
 - d. Flood risk across the borough, and which is high within areas of our town centre, and
 - e. Infrastructure capacity where appropriate mitigation is not possible, or the delivery of development is contingent upon the timing of the necessary infrastructure upgrades.
- 2.4 The Local Plan was adopted on 25 April 2019. This sets a new context for the delivery of homes in the Borough, including making provision for sufficient new housing to meet identified needs. Furthermore, it sets out the key infrastructure requirements upon which the delivery the planned homes depend.
- 2.5 The Council is developing the second part of the borough's Local Plan; the 'Local Plan: development management policies' (LPDMP) document. This document will provide further and more detailed planning policies that will help developers and decision-makers to deliver appropriate development within the borough.
- 2.6 The LPDMP remains in the early stages of its production, having recently progressed through the Regulation 18 state of public consultation. The Local Development Scheme anticipates that this document will be adopted toward the end of 2022.

3. GBC Housing delivery analysis

- 3.1 In this section, the recent housing delivery performance in Guildford borough is outlined and evaluated. The discussion includes a reflection on recent figures for both completions and permissions for new homes in the borough (see GBC’s Annual Monitoring Report (2018 – 2019) (AMR) for further detail), including a consideration of the broader viability conditions in Guildford and their effect on the past delivery of housing in the borough.
- 3.2 Following this introductory discussion, the remaining analysis identifies and outlines an assessment of the factors that are considered to be affecting the rate and scale of delivery of homes in the borough that are within the control of the LPA. These factors are grouped and discussed under five key influence areas. Each discussion concludes with a ‘summary diagnostic’ that identifies GBC’s (i) areas of strength, and (ii) areas for development, in relation to supporting the increased delivery of appropriately located and designed homes in the borough. These discussions provide the foundation that constitutes the Action Plan identified in Section 4.

Profile: Local housing delivery performance

Completions

- 3.3 The number of homes delivered in Guildford during the previous 3 years has averaged 314 dwellings per annum (dpa). Annual figures are reflected in the table below. The number of homes delivered has consistently been below the Objectively Assessed Need (OAN). These completions have included affordable homes. In regard to the delivery of Affordable Homes, there have generally not been major issues securing delivery in line with requirements on the majority of qualifying sites.

Year	Recent Annual Housing Completions			
	16/17	17/18	18/19	Average
All	294	299	351	314
Affordable homes	32	111	89	77

Source – GBC Annual Monitoring Report 2018/19

Permissions

- 3.4 The pipeline of delivery is fed by planning permissions. An analysis of permissions over the past seven years is reflected below.

Site size (Net number of homes)	Proportion of new homes approved per year						
	2012 / 2013	2013 / 2014	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019
Less than 5	39%	39%	16%	34%	83%	12%	11%
6 – 15	24%	22%	18%	26%	11%	11%	12%
16 – 50	37%	23%	8%	40%	3%	6%	-
51 – 200	-	16%	8%	-	3%	-	23%
200+	-	-	50%	-	-	71%	54%

Source – GBC Annual Monitoring Report 2018/19

- 3.5 Historically, a significant proportion of housing supply has been from smaller developments. There have been some exceptions more recently with several larger scale developments being permitted, though several were allowed through appeal⁶, with the lack of housing land supply being a consideration in these cases.
- 3.6 The increasing significance of larger planning permissions within the borough has led to the outstanding capacity (i.e. sites with planning permission for new homes that have not been built) increasing significantly in the 2018/19 year to 3,038 homes⁷ (from 2,522 in 2017/18).

Market considerations - viability

- 3.7 The delivery of homes (or lack thereof) can be impacted upon by viability considerations.
- 3.8 GBC's Local Plan Viability Update⁸ (Nov, 2017), which accompanied the submission of the Local Plan for examination, found that the Plan's policy requirements and infrastructure requirements do not unduly burden the delivery of residential development in Guildford borough.
- 3.9 It should be acknowledged that the viability of sites may vary throughout the period of the Local Plan. In particular, market uncertainty is an acknowledged risk that can impact on the rate of housing delivery. However, the demand for residential property remains strong, albeit that there are current uncertainties, and there appears to be limited scope that viability will be significantly impacted over the Plan period. This is particularly the case should one consider affordability as a proxy for demand.
- 3.10 There is therefore no reason to believe that there are likely to be widespread issues relating to viability that may prevent homes coming forward within the borough.
- 3.11 It is acknowledged, however, that the impact of the Covid-19 pandemic presents a risk to housing delivery. The extent and depth of this impact is not yet clear, however the Council is aware of its role in seeking to mitigate negative impacts on housing delivery and this is reflected upon in the Action Plan.

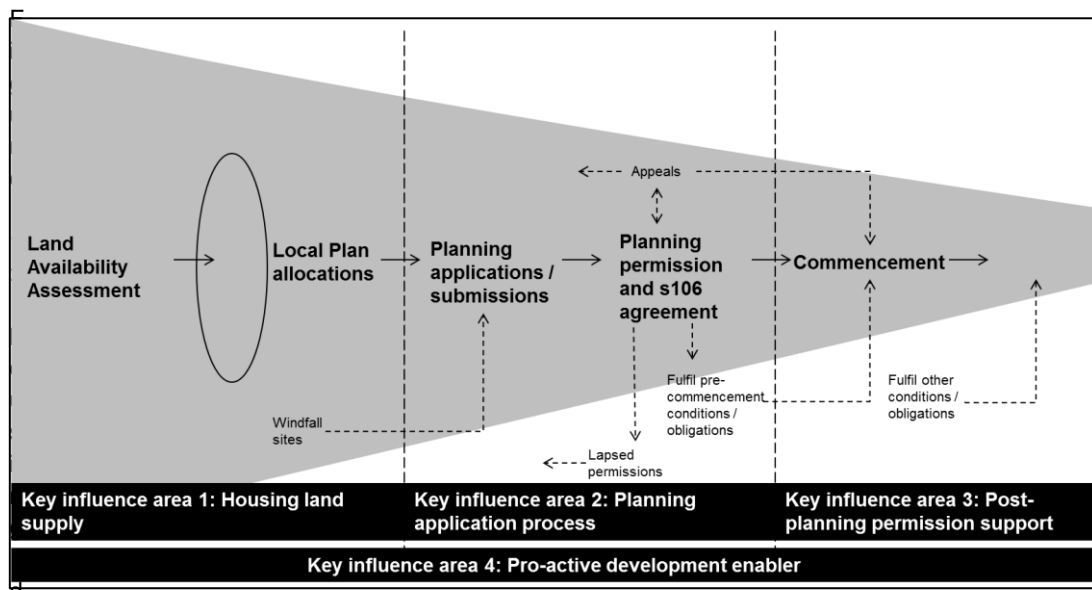
⁶ See for instance 438 homes approved at Guildford Railway Station, Station View Guildford (14/P/02168) and 295 homes approved at Howard of Effingham School & Lodge Farm, Lower Road & Browns Field, Browns Lane, Effingham (14/P/02109).

⁷ See page 10 of GBC Annual Monitoring Report, 2018/19.

⁸ See <https://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=26569&p=0>.

Housing delivery: Key influence areas and the housing delivery pipeline

- 3.13 Briefly, it should be noted that there is no single factor that governs the rate and scale of the delivery of homes within the borough. Rather, delivery is influenced by the interplay of a range of factors, including; market forces within the wider economy, local demand and supply influences, policy and regulation, and site-specific factors including considerations relating to the provision of required infrastructure.
- 3.14 GBC does not have the power to ensure that the delivery of granted planning permissions takes place. However, GBC does play a supporting role at various points, along what can be termed a “pipeline”, in relation to the planning and delivery of homes (see Figure 1).
- 3.15 One aspect of GBC’s role in the planning and delivery of homes includes the identification and allocation of sites (via the Local Plan) that have potential for housing development, in order to ‘feed’ into the pipeline of potential sites (see key influence area 1). Additionally, GBC performs an effective regulatory role, with various associated support functions during the planning application process (see key influence area 2). Furthermore, GBC may also have a role in supporting delivery following the granting of planning permission (see key influence area 3), and as an enabler more broadly across these areas (see key influence area 4). Of particular importance is consistency in the performance of these functions, even at times of national crises (see key influence area 5).



elivery pipeline and key influence areas in relation to the delivery of homes

- 3.16 GBC’s performance in these areas may influence the likelihood of a site progressing from initial conception through the delivery “pipeline” and providing homes for the borough’s existing and prospective residents, including the speed at which this is achieved.

Key influence area 1: Housing land supply

Land identification, allocation and monitoring

- 3.17 Prior to the adoption of the Local Plan in April 2019, one significant factor contributing to the inadequate delivery of sufficient homes within the borough was the lack of identification of suitable sites, including those that could be considered deliverable. This led to GBC demonstrating a five-year housing land supply of 2.53 years, as reflected in the Council's previous Annual Monitoring Report 2017/18 (AMR).
- 3.18 Key steps that GBC have taken to support higher levels of delivery of both market and affordable homes on suitable sites include; the identification of 'suitable' land for development through the publication of the Council's Land Availability Assessment (LAA), alongside providing sufficient certainty to the market by incorporating and allocating a number of those larger suitable sites into the Council's adopted Local Plan.
- 3.19 The most significant impact that GBC could have made to improving the prospects for the increased delivery of homes across the borough comprises the adoption of the Local Plan, with sufficient sites to sustain a rolling five-year Housing Land Supply throughout the Plan period (2015 – 2034).
- 3.20 Illustrating this point, the housing trajectory within the Local Plan demonstrates an anticipation that the delivery of homes will significantly increase upon historic rates within the first five years of the Local Plan post-adoption.

Annual Housing Completions (pre-adoption of Local Plan)				Housing trajectory – anticipated supply (first 5 years of the Local Plan)				
15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
387	294	299	351	293	1134	1345	1204	1137

Source: (adapted) Guildford Borough Land Availability Assessment (LAA) October 2019

- 3.21 Furthermore, it is considered that the historic lack of identification of a suitable range of both smaller and larger sites has contributed to the insufficient delivery of an appropriate mix in the types and tenures of homes (including affordable homes) that have been delivered. The identification of a wider mix of smaller and larger sites as suitable for development has been linked to the greater provision of an appropriate mix in both the types and tenures of homes delivered⁹, increasing the variety and differentiation of homes delivered. This is a national issue, but also likely to be relevant to Guildford.

⁹ The homogeneity of the types and tenures of the homes on offer on larger sites, and the limits on the rate at which the market will absorb such homogenous products, are considered to be fundamental drivers of the slow rate of build out (see [HCLG, 2018: Independent Review of Build Out](#)).

- 3.22 To support the provision of sufficient diversity in the housing delivered, the Local Plan identifies and allocates a range of sites for development across different scales. Importantly, the plan includes policies that require a contextually-appropriate mix of housing tenures, types and sizes (See Local Plan Policy H1), including from the strategic sites. The plan also facilitates the delivery of new homes across a range of different locations within the borough. Together, it is envisaged that this will contribute to a more diverse range of homes on offer and assist in terms of the rate of market absorption (and therefore speed of delivery).
- 3.23 Despite the benefits provided through the adoption of the Local Plan, as outlined above, further actions will remain important for the Council to support the maintenance of an adequate housing land supply.
- 3.24 The Council should continue to ensure that the Land Availability Assessment remains robust and up-to-date, with annual renewals of its evidence-base. This would ensure that the borough's five-year housing land supply remains based on robust evidence concerning the deliverability of identified sites in line with the updated NPPF definitions of deliverability and developability.
- 3.25 Furthermore, the annual consideration of additional sites for inclusion in the LAA and Brownfield Land Register provides up-to-date information, which can be considered in any future review of the Local Plan, as and when this becomes necessary.
- 3.26 Additionally, the monitoring of the delivery of homes against housing targets (the outputs of which are reported in the AMR) will remain important to inform GBC's future housing land supply position. This system also presents an opportunity, if developed further, to provide a greater level of information at an area or site level and to flag any areas of concern with regard to progress with delivery.

Key influence area 1 – diagnostic summary

Areas of strength

- ✓ Recently adopted Local Plan: strategy and sites (2015 – 2034)
- ✓ Rolling 5 year housing land supply
- ✓ Diverse mix in types and tenures of the homes required by Local Plan
- ✓ Local Plan supply includes mix of smaller and larger sites, across a range of locations, and is considered to be robust with sufficient flexibility to adapt to rapid change
- ✓ Regularly updated LAA and Brownfield Land Register

Areas for development

- Updating of LAA, Brownfield Land Register and ongoing confirmation of deliverability of sites.
- Enhanced monitoring and reporting regarding delivery of homes (permissions, commencements, completions)

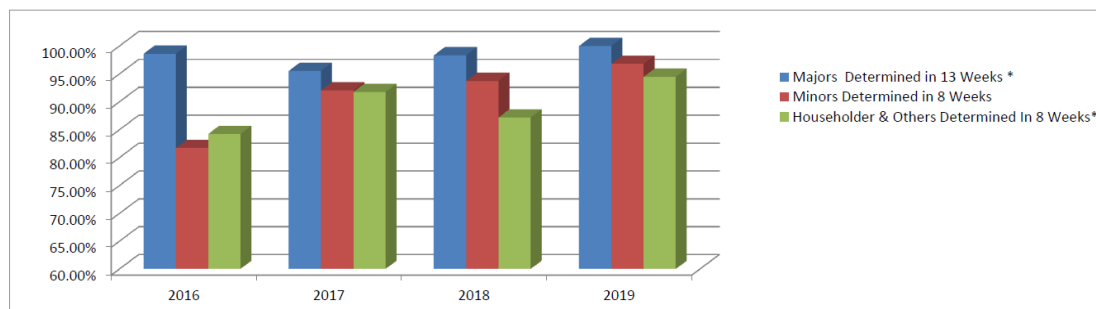
Key influence area 2: Planning application process

Associated mechanisms, guidance and support

3.27 Although the Local Plan identifies sufficient sites capable of maintaining a rolling five-year housing land supply, delivery will also be determined by sites progressing to and through the planning application process.

3.28 GBCs record in terms of determining planning applications within statutory obligation (as well as its own target) time-periods is generally regarded as very good. Figure 2 below reflects that over the past three years, approximately 95% of major applications have been determined within the statutory 13-week period. This figure is a

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r the year to date.

Figure 2: Applications determined within Statutory 8 and 13 week timescales

3.29 The Development Management team aim to maintain this high level of performance, even in light of a likely increase in the scale of major applications to be dealt with by the major applications team.

3.30 Part of the means of continuing this level of performance includes ensuring that guidance and support mechanisms are in place to assist decision-makers and (prospective) applicants in their roles and, as a consequence, enabling suitable sites to progress toward approval.

3.31 This is not a simple process as there are many component parts throughout the development management process from pre-application; to application; potentially multiple reserved matters; discharge of conditions; ratifying section 106 legal agreement provisions and satisfying other matters such as 278 agreements or infrastructure requirements that need to work well and efficiently to enable delivery of housing in a timely manner.

3.32 GBC has recently reviewed mechanisms related to the planning application process that would support increased delivery of homes.

3.33 In this regard, key areas where GBC is actively playing a positive role include:

- **Pre-application advice:** GBC offers a comprehensive [pre-application advice service](#) to assist in the preparation of proposals. Experience suggests that effective pre-application advice leads to high quality and appropriate development schemes being granted planning permission more quickly. It can also identify potentially inappropriate schemes at an early stage and prevent unnecessary time and cost for both customers and the Council.
- **Planning performance agreements (PPAs):** GBC offers PPAs to major applications involving a number of pre-application meetings, updates throughout the applications process, guidance and sign off at the conditions phase.
- **Training:** Various training opportunities occur on an ad-hoc basis. This includes updating members on the Planning Committee on key matters that can assist their consideration of planning applications.
- **Reduction in time to commencement:** On larger housing schemes, GBC has started requesting the applicant to reduce the time lag from permission being granted to commencement (or build out). An early example is the agreement of a condition on a significant scale Local Plan allocation site that effectively requires that the development be commenced within a year of granting the permission rather than the typical three year period.
- **Removal / adjustment of pre-commencement conditions:** The planning team have recently undertaken a project to remove/adjust as many pre-commencement planning conditions from its standard list to be effective as of 1 October 2018. With this initiative, there has been an ongoing review and refresh of the standard conditions used and with careful re-wording it has been possible to remove nearly all pre-commencement conditions to a point whereby only the essential ones remain, such as archaeology; ground contamination and site levels. GBC is also acting in line with the Town and Country Planning Pre-commencement Regulations, 2018 in agreeing such conditions with applicants. However, there will still be a greater requirement for pre-commencement conditions on large major applications.
- **Encourage early consultation by developers with residents and local Councillors for developments of ten properties or more:** GBC encourages proper engagement as best practice to ensure that prospective issues are identified at an early stage in the application process.
- **Updating and reviewing the local validation checklist.** GBC has recently updated this checklist as a means to reduce the number of invalid applications and the length of time they are recorded as invalid.

3.34 Positively continuing the above initiatives is viewed as supportive of achieving the increased level of delivery of homes envisaged by the Local Plan. GBC will need to consider monitoring whether they are having the desired effect and review these actions if necessary.

- 3.35 Further to these efforts, the significant change in the planning policy context through the adoption of the Local Plan means that there will likely be a need for additional, more detailed planning guidance to planning applications. Whilst pre-application advice and training can assist, GBC considers that supplementary planning guidance is likely to be required in a number of areas.
- 3.36 Improving the level of planning guidance is considered to provide greater levels of certainty to prospective developers, to promote consistency in interpretation and application of policies, and to assist in ensuring that the planning application process runs smoothly and policy compliant schemes are delivered.
- 3.37 In order to improve the detail of guidance, GBC are currently producing a number of Supplementary Planning Documents to assist developers and decision-makers; including the Strategic Development Framework covering the large, strategic-scale sites, alongside a Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document to assist developments in meeting various policy requirements.

Key influence area 2 – diagnostic summary

Areas of strength

- ✓ Timeframes in terms of decision-making
- ✓ Pre-application advice services and increased use of PPAs
- ✓ Training opportunities for applicants and decision makers
- ✓ Pro-active role in reducing pre-commencement conditions and implementing conditions aimed at reducing the time permitted to commence development
- ✓ Encourage early consultation by developers with residents and local Councillors for developments of ten properties or more
- ✓ Updating and reviewing the local validation checklist

Areas for development

- Ongoing review / monitoring effectiveness of mechanisms aimed at speeding up delivery
- Production of updated Supplementary Planning Documents to provide guidance and greater certainty

Key influence area 3: Post-planning permission support

Understanding and addressing delivery barriers

- 3.38 LPAs have limited influence over delivery once planning permissions have been granted. However, there are some areas that impact on whether a planning permission is built out, and the speed at which it can progress, which GBC may seek to influence.
- 3.39 It is considered important for GBC to understand any reasons associated with possible delays in delivery following the granting of planning permission, in particular:
- whether these reasons are associated with any of GBC's areas of influence (identified in key influence areas 1 and 2 above). This may include understanding any potential challenges in the ability of developers to comply with particular policies or planning conditions; and
 - whether there are any other site or area specific factors within GBC's control that it might address to enable development post-planning permission being granted (key influence area 3).
- 3.40 In this regard, it is important that GBC is able to accurately monitor delivery at a site level to provide an indication of where delivery issues might exist. Monitoring based on completion figures received by the LPA may not provide sufficient and nuanced information regarding possible delivery barriers, especially in relation to significant housing schemes. Opportunities therefore exist for enhancement of monitoring and reporting of completions, but also tracking any major site level delivery barriers (see Key influence area 1).
- 3.41 An important pre-requisite to understand the reasons that may be affecting delivery in the borough at the post-permission stage comprises ensuring that sufficient mechanisms are in place for developers to provide feedback to GBC on potential delivery concerns or issues. Part of this can be achieved through the increased engagement with developers through proactive monitoring as mentioned above.
- 3.42 GBC currently also engages with developers in order to identify and understand potential issues that may hold up development through general contact, including as part of the LAA evidence-gathering process and planning application processes. Further engagement is also achieved through the Council's planning agent's forum that occurs twice yearly. It is important that these feedback loops continue.
- 3.43 This level of feedback may also be improved through the relationships that Council officers build with onsite planning agents involved in the delivery of larger sites. Officers responsible for monitoring the delivery of sites have set out to develop relationships with on-site sales teams and delivery monitoring in order to gain further insight into any issues regarding delivery 'on the ground'.
- 3.44 Further to this, it is likely to become increasingly important that GBC understands any significant issues that may hamper progress, specifically with delivery of major permitted developments at an area or strategic-site level.

- 3.45 In this regard, it is considered that there are opportunities to enhance engagement with site promoters and developers (on a selective site-specific basis), particularly as development envisaged in the Local Plan comes forward and is permitted. This may include through heightened engagement on delivery of sites (e.g. through the LAA process or alternative engagement forums).
- 3.46 Where delivery barriers are identified, interventions may extend to:
- review of guidance or procedures related to planning and administrative processes where justified (see key influence areas 1 and 2).
 - GBC assisting in unblocking issues where they are within its power to do so (such as liaison with infrastructure providers, where issues are of a strategic nature).
- 3.47 As previously identified (see key influence area 2), GBC maintains a positive record in regard to the swift administration of the planning application process. Part of this includes the management of 'post-permission' applications, such as the amendment, confirmation or removal of conditions attached to the site's permission. GBC's record in dealing with these applications is already positive.

Key influence area 3 – diagnostic summary

Areas of strength

- ✓ Established existing platforms for identifying delivery barriers e.g. planning agents' forum
- ✓ Positive record on processing 'post-permission' applications

Areas for development

- Enhanced monitoring and reporting regarding delivery of housing (permissions, commencements, completions)
- Consider enhanced engagement mechanisms regarding (major) site delivery, identifying barriers and associated facilitating actions
- Liaison with infrastructure partners

Key influence area 4: Proactive development enabler

- 3.48 In certain cases, LPAs play a more direct role in the delivery of development and housing within their borough. This is the case in Guildford.
- 3.49 GBC benefits from having an in-house Corporate Programmes team that plays a dedicated and proactive role in enabling development within the borough. Amongst other matters, this team seeks to address infrastructural challenges in delivering and enabling key development projects in line with the Local Plan. This may be through conducting pre-feasibility work, which feeds the pipeline of suitable, available and deliverable sites (see key influence area 1) or more direct interventions such as unlocking supporting infrastructure to enable housing delivery or progressing key Council projects through pre-application / application processes.
- 3.50 Key projects that are likely to enable the delivery of housing development, where the Council is playing an enabling or driving role, include for example:
- North Street redevelopment;
 - Guildford Park Road and Bright Hill car parks;
 - Town Centre Regeneration;
 - Weyside Urban Village (former Slyfield Area Regeneration Project);
 - Ash Road Bridge.
- 3.51 Secondly, in addition to its role in securing affordable housing on external sites, the Council is also committed to delivering housing opportunities through North Downs Housing Ltd (NDH) - its wholly-owned housing company. The company presents an opportunity to develop properties and aims to increase the availability of market housing that is more affordable to local residents.
- 3.52 Finally, and associated with the projects identified above, GBC plays an active role in supporting the delivery of housing through bidding for funding, such as from the Housing Infrastructure Fund (HIF).
- 3.53 Monitoring of delivery and engagement through the processes outlined above may provide useful input to inform how GBC might further target its proactive roles in enabling development and addressing barriers to delivery.

Key influence area 4 – diagnostic summary

Areas of strength

- ✓ Established Corporate Programmes team – active in key enabling projects
- ✓ North Downs Housing Ltd (Housing Company) created as a delivery agent
- ✓ Bid for infrastructure funding as and when opportunities may arise

Areas for development

- Consider feedback from engagement platforms / stakeholders in targeting its enabling interventions

Key influence area 5: Maintaining consistency in these key areas

Covid-19 'Social Distancing' in the Planning Process

- 3.54 To this point, this section has explored four key influence areas that indicate GBC's capacity to perform its role in supporting the delivery of development in the borough. Following the introduction of 'social distancing' measures in England during March 2020, the Council has faced an unprecedented task of maintaining these practices in a period of emergency response that prohibits the typical face-to-face contact that permeates the usual functioning of the planning process. As such, the fifth key influence area comprises the Council's ability to continue to perform its role in a consistent manner with adapted practices.
- 3.55 Research recently published by the Royal Town Planning Institute (RTPI)¹⁰, the planning profession's governing body, highlighted a range of concerns among planning professionals with regard to the performance of the planning system as a result of the Covid-19 emergency response. These broader concerns reflect the four key influence areas as previously discussed. In particular, concerns related to; the barriers preventing officers progressing an application in the usual ways, expiration of current planning permissions, and the difficulties of processing new applications during the sustained period of remote working.

The Council's Response

- 3.56 The Government response and relevant guidance is fast-moving. The broader strategy comprising the phased easing of restrictions was announced in May 2020¹¹. Significantly, the Government implemented legislative changes and published additional guidance swiftly in order to assist the profession's response to the restrictions. Government guidance asked the profession to take an innovative approach to maintaining momentum in the system, which has guided GBC's activity.
- 3.57 Critically, as of April 2020 regulations made under the Coronavirus Act (2020) provided Local Authorities with the power to hold public meetings, including planning committees, virtually, through the use of video and telephone conferencing technology. Guildford held its first virtual planning committee meeting on 20th May with success and will continue to employ this mechanism as necessary.
- 3.58 The Councils' recent ICT refresh has played a key role in ensuring continuity in levels of service across functions that have influence over the delivery of homes in Guildford borough. To continue performing its functions in the planning process, the Council has implemented various remote-working practices to ensure that momentum is maintained during the period. These and other initiatives to maintain consistency in these areas are reflected on briefly below.

¹⁰ RTPI (2020) Pragmatism and Preparing for the Recovery. Available online at: <https://www.rtpi.org.uk/research/2020/may/the-planning-profession-s-rapid-response-to-covid-19/>.

¹¹ Government of Ireland (3 May 2020) Roadmap for reopening society and business.

Maintaining Consistency - Consideration of Key Influence Area 1

- 3.59 Key influence area 1 is concerned primarily with the identification of a sufficient number and mix of sites in order to support a rolling five-year housing land supply. The practices involved in maintaining this principally comprise, at this stage, the annual reviews of both the Land Availability Assessment and Brownfield Land Register.
- 3.60 Given the Council's capacity for remote-working, the above practices have been largely unaffected by the Covid-19 restrictions to date and should not be affected should the restrictions continue. Planning officers have been able to continue to identify and assess potential development sites¹² and update the two documents in the usual ways via remote access, with continued access to mapping technologies and typical contact methods with the public and agents/developers remaining open.
- 3.61 Looking forward, the access that the public and agents/developers have to planning officers in order to support the identification of further potential development sites will remain important. Additionally, planning officers will need to continue to develop relationships with key stakeholders through telephone and email contact, which are typically the primary sources of contact anyway.
- 3.62 Therefore, both the strengths and areas of improvement considered within the discussion for key influence area 1 are broadly unaffected by the Covid-19 restrictions by virtue of the Council's capacity to continue performing through remote-working practices. As such, the Council should continue to focus on improving the evidence base in the LAA and Brownfield Land Register through annual review.

Maintaining Consistency - Consideration of Key Influence Area 2

- 3.63 GBC's performance with regard to the processing of planning applications is generally regarded highly. The planning department implemented a number of measures swiftly in anticipation of the introduction of social distancing requirements in order to ensure that momentum could be maintained in the processing of planning applications throughout the emergency response period. These measures include:
- Planning officers working from home where possible, having access to the office when necessary.
 - Ensuring that site visits continue to be undertaken, but without face-to-face meetings with the applicant or agent at the property.
 - Continuing pre-application advice services both for existing application and new pre-applications, but without face-to-face meetings or socially distanced if meeting is regarded as necessary.
 - Accepting new planning applications and dealing with them in a timely manner with electronic processes and home working. Existing applications continue to be determined within statutory timescales wherever possible.

¹² Please refer to the Council's Land Availability Assessment, Appendix 1: Methodology, for further detail on these practices .Available online at: <https://www.guildford.gov.uk/article/22740/Housing>.

- Operating planning committee virtually¹³. However, delegated powers will be used to determine applications wherever possible.
- 3.64 Furthermore GBC have updated its Statement of Community Involvement (May 2020) reflecting altered arrangements including relating to virtual planning committee meetings.
- 3.65 In summary, the processing of applications is to a significant extent ‘business as usual’ with some adaptations, such as home-working and virtual planning committee, as required to ensure compliance with government guidance.
- 3.66 As a result, decision-making has been largely unaffected to-date. GBC’s level of delegation to officers is high, above 97% and 141 applications were processed in April 2020 compared with 149 the year before. Looking forward, the Planning Department will seek to maintain this record whilst continuing to improve in monitoring the effectiveness of other mechanisms aimed at supporting delivery within the requirements of social distancing. GBC should also continue to produce Supplementary Planning Documents to provide guidance and greater clarity for applicants and decision-makers.

Maintaining Consistency - Consideration of Key Influence Area 3

- 3.67 GBC’s role in supporting development at this stage of the planning process comprises principally the ability to monitor, effectively identify and manage potential issues relating to the implementation of development post-permission, in addition to the swift processing of post-permission planning applications.
- 3.68 As outlined above, GBC’s officers have managed to retain their high performance in relation to the processing of planning applications. However, GBC’s ability to effectively monitor potential issues with the implementation of development sites post-permission may be somewhat compromised by the absence of face-to-face contact. Although much of the contact that planning officers would have had with applicants and agents will continue through virtual means, it will not be available to monitoring officers to visit and build relationships with on-site sales teams.
- 3.69 Looking forward, GBC should seek to improve the platforms for potential feedback from applicants, agents and on-site sales teams. Monitoring officers will need to focus on proactively seeking to develop and maintain these relationships through phone and email conversations rather than face-to-face meetings. It remains to be determined whether the agents’ forum will be effected by the social distancing measures, but alternative arrangements may have to be identified.
- 3.70 Social distancing may also effect the Council’s active and ongoing monitoring of development more generally. Although site visits may still take place for the majority of monitoring purposes, there may be situations in which officers will be refused access to sites due to social distancing requirements and will be unable to determine up-to-date completion rates. However, the number of sites that this is likely to effect

¹³ It is recognised that there are some limitations in this regard, including that not all items due to be decided by planning committee will be considered virtually.

will be few and the Council principally relies on other sources of information for monitoring purposes anyway. This may have a relatively limited impact.

Maintaining Consistency - Consideration of Key Influence Area 4

- 3.71 As with Key Influence Area 1, given the Council's capacity for remote-working, the work of GBC's in-house Corporate Programmes team and other relevant practices are likely to have been largely unaffected by the Covid-19 restrictions to date and should not be affected should the restrictions continue. The Council will continue to consider feedback from existing engagement platforms and stakeholders in targeting enabling interventions.

Summary: key delivery issues and areas for development

- 3.72 The reasons for the delivery of homes in Guildford being historically lower than required rates are varied. However, the lack of an up to date Local Plan has been a significant constraint in this regard and a major contributing factor in this historic under-delivery. The recent adoption of the Local Plan is anticipated to improve levels of housing delivery over time.
- 3.73 In support of the planned increase in the rate of delivery of homes, the table below provides a summary of opportunities across the identified four key influence areas for GBC to:
- continue doing things that it already does well – these are regarded as **areas of strength**;
 - provide further support for the envisaged delivery trajectory through enhancement of its roles – these are regarded as **areas for development**.

Diagnostic summary

Key influence area 1: Housing land supply
<p style="text-align: center;">Areas of strength</p> <ul style="list-style-type: none">✓ Recently adopted Local Plan: strategy and sites (2015 – 2034)✓ Rolling 5 year housing land supply✓ Diverse mix in types and tenures of the homes required by Local Plan✓ Local Plan supply includes mix of smaller and larger sites, across a range of locations, and is considered to be robust with sufficient flexibility to adapt to rapid change✓ Regularly updated LAA and Brownfield Land Register
<p style="text-align: center;">Areas for development</p> <ul style="list-style-type: none">○ Updating of LAA, Brownfield Land Register and ongoing confirmation of deliverability of sites○ Enhanced monitoring and reporting regarding delivery of homes (permissions, commencements, completions)

Key influence area 2: Planning application process
<p style="text-align: center;">Areas of strength</p> <ul style="list-style-type: none">✓ Timeframes in terms of decision-making✓ Pre-application advice services and increased use of PPAs✓ Training opportunities for applicants and decision makers✓ Pro-active role in reducing pre-commencement conditions and implementing conditions aimed at reducing the time permitted to commence development✓ Encourage early consultation by developers with residents and local Councillors for developments of ten properties or more✓ Updating and reviewing the local validation checklist
<p style="text-align: center;">Areas for development</p> <ul style="list-style-type: none">○ Ongoing review / monitoring effectiveness of mechanisms aimed at speeding up delivery○ Production of updated Supplementary Planning Documents to provide guidance and greater certainty

Key influence area 3: Post-planning permission support

Areas of strength

- ✓ Established existing platforms for identifying delivery barriers e.g. planning agents' forum
- ✓ Positive record on processing 'post-permission' applications

Areas for development

- Enhanced monitoring and reporting regarding delivery of housing (permissions, commencements, completions)
- Consider enhanced engagement mechanisms regarding (major) site delivery identifying barriers and associated facilitating actions
- Liaison with infrastructure partners

Key influence area 4: Proactive development enabler

Areas of strength

- ✓ Established Corporate Programmes team – active in key enabling projects
- ✓ North Downs Housing Ltd (Housing Company) created as a delivery agent
- ✓ Bid for infrastructure funding as and when opportunities may arise

Areas for development

- Consider feedback from engagement platforms / stakeholders in targeting its enabling interventions

4. Action Plan

- 4.1 The Action Plan draws on the housing delivery analysis for GBC in the preceding section, focusing on what the Council can do to support the delivery of homes in accordance with its housing targets.

Action	Responsibility	Timeframe
Key influence area 1: Housing land supply		
1.1 Update LAA and Brownfield Land Register confirming site deliverability/developability, and where applicable identify potential site delivery issues.	Planning policy	LAA: Oct 2020 Brownfield register: Dec 2020
1.2 Enhance monitoring system & reporting, including at major site level to track delivery progress and issues.	Planning policy	2019/20 – 2020/21
Key influence area 2: Planning application process and associated guidance		
2.1 Maintain good record in meeting targets relating to determining development applications.	Development management	Ongoing
2.2 Continue to offer pre-application advice and PPAs.	Development management	Ongoing
2.3 Continue to offer training opportunities for applicants and decision-makers.	Development management / Planning policy	On demand / ongoing
2.4 Periodically review effectiveness of use of conditions to speed up delivery.	Development management	Periodic / annual
2.5 Encourage early consultation by developers with residents and local Councillors for developments of ten properties or more.	Development management	Ongoing. Case basis.
2.6 Update and review local validation checklist.	Development management	Periodic / when required
2.7 Monitor / seek feedback on performance of other support offered.	Development management	Periodic / annual
2.8 Identify and produce key Supplementary Planning Documents.	Planning policy	Ongoing programme
Key influence area 3: Post-planning permission support		
3.1 Maintain existing platforms for engagement and use to identify areas that may impact on delivery (e.g. planning agents forum).	Development management	Ongoing
3.2 Consider enhanced means of engagement regarding major site delivery, identifying barriers and associated facilitating actions.	Development management / Planning policy	2019/20–2020/21
3.3 Consider liaising with infrastructure partners to support delivery where strategic issues are identified.	Development management / Corporate Programmes /	Ongoing

	Planning policy	
Key influence area 4: Proactive development enabler		
4.1 Continue proactive development enabling role through major projects and housing delivery programmes	Corporate Programmes / Housing	Ongoing. Projects have their own timetables.
4.2 Consider feedback from engagement platforms / stakeholders in targeting its enabling actions	Corporate Programmes	Ongoing

5. Next steps

- 5.1 The Action Plan will be subject to annual review by the Planning Policy team in line with Government requirements. Supplementing this, the AMR, which includes monitoring and reporting of housing delivery, will provide an important information source for the Action Plan in terms of how delivery of homes progresses over time.
- 5.2 The Council welcomes suggestions regarding potential additional actions that could further assist in achieving its targets in terms of housing delivery. These inputs are encouraged and can be submitted at any time during the course of the year.
- 5.3 Please contact the Planning Policy team with any suggestions by emailing PlanningPolicy@guildford.gov.uk or calling 01483 444 471.

Appendix 1: Housing Delivery Test Calculation

(see [Housing Delivery Test Measurement Rule Book](#) for more detail)

The Housing Delivery Test is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the areas covered by the Housing Delivery Test, over a rolling three year period.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total new homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

Appendix 2: Planning Practice Guidance (extract)¹⁴

What is the Housing Delivery Test action plan?

The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

Who can produce an action plan?

Local planning authorities, in collaboration with key stakeholders, are expected to produce the action plan. This will apply for each year of under-delivery.

Any area may wish to produce an action plan as a matter of good practice or to identify processes to exceed housing requirements and support delivery. This could include local planning authorities where delivery meets, or exceeds, 95% of their housing requirement. In areas not measured by the Housing Delivery Test, such as National Park Authorities, the Broads Authority and development corporations without (or which do not exercise) both plan-making and decision-making functions, the use of an action plan is encouraged where appropriate to help identify any causes of under-delivery and actions to address these.

Who can be involved in the creation of the action plan?

The local planning authority is responsible for producing the action plan, involving relevant stakeholders in the process. It is for the local planning authority to decide which stakeholders to involve, although representatives of those with an impact on the rate of delivery should be included, such as:

- small and large developers;
- land promoters;
- private and public land owners;
- infrastructure providers (such as utility providers, highways, etc);
- upper tier authorities (county councils) in two-tier areas;
- neighbouring authorities with adjoining or cross-boundary sites.

¹⁴ See [Planning Practice Guidance: Housing and economic land availability assessment](#), paragraphs 68 – 75.

What aspects could local planning authorities review as part of the action plan?

The local planning authority may wish to include an analysis of under-delivery considering:

- barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales;
- barriers to delivery on sites identified as part of the 5 year land supply (including land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.);
- whether sufficient planning permissions are being granted and whether they are determined within statutory time limits;
- whether the mix of sites identified is proving effective in delivering at the anticipated rate.
- whether proactive pre-planning application discussions are taking place to speed up determination periods;
- the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery;
- whether issues, such as infrastructure or transport for example, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable;
- the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery;
- whether issues, such as infrastructure or transport for example, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable;
- whether proactive pre-planning application discussions are taking place to speed up determination periods;
- whether the mix of sites identified is proving effective in delivering at the anticipated rate.

What actions could local planning authorities consider as part of the action plan?

Actions to boost delivery could include:

- revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development, including public sector land and brownfield land;
- working with developers on the number of houses on site, including whether sites can be subdivided;
- offering more pre-application discussions to ensure issues are addressed early;
- consider the use of Planning Performance Agreements;

- carrying out a new Call for Sites, as part of plan revision;
- revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies;
- reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;
- establishing whether certain applications can be prioritised, conditions simplified, or their discharge phased on approved sites, and standardised conditions reviewed;
- ensuring evidence on a particular site is informed by an understanding of viability;
- considering compulsory purchase powers to unlock suitable housing sites;
- using Brownfield Registers to grant permission in principle to previously developed land;
- encouraging the development of small sites and higher site densities.

When will the action plan be implemented?

To ensure the document is as useful as possible, local planning authorities should publish an action plan within 6 months of publication of the Housing Delivery Test result.

Will an action plan require formal public consultation?

The action plan will work best as a transparent, publicly accessible document. The decision about whether to consult on an action plan is for the local planning authority. Local planning authorities should be mindful of the need to both produce and implement the document's proposals in a timely fashion.

How could the action plan be monitored?

Responsibility for creating the action plan lies with the local planning authority, as does monitoring of the action plan. However, the action plan is a collaborative process between various stakeholders, and all stakeholders have a responsibility to deliver the action plan.