



Housing Delivery Test Action Plan

September 2021



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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1. Introduction

Why housing delivery is important

- 1.1 The Government's Planning for the future, White Paper was published on 6 August 2020, with consultation closing on 29 October 2020. The proposed reforms to the planning system are underpinned with the aim to increase housing supply and making the planning system much simpler. The Government's response to the consultation has not been published but clearly there is a drive to boost the supply of homes.
- 1.2 Since the last Housing Delivery Test (HDT) Action Plan was produced in August 2020, the Council has progressed with a New Local Plan Review (NLPR). The first stage of the NLPR – the Borough Issues consultation paper¹ - was published in September 2020 and was open for consultation from 29 September to 11 November 2020. The responses received during the Borough Issues consultation informed production of the second stage of the NLPR – the Issues and Options consultation paper² - which was published in July 2021 and was open for consultation from 26 July to 4 October 2021. Both of these are not statutory steps in drafting a Local Plan, but we committed to this early-stage consultation in our Statement of Community Involvement³, which was adopted in February 2020. This has also committed us to digital engagement reflecting the ambitions of the Planning White Paper. We have had huge success using digital engagement in our consultations and recognise that this is key in bringing sites forward with community support.
- 1.3 In addition, the Mayor of London has published a New London Plan – the London Plan 2021⁴ on 21 March 2021. The London Plan 2021 reduces our housing target from 733 homes per annum to 448 homes per annum. The NLPR has and will continue to be produced in general conformity with the London Plan 2021. In addition, it will take into account and be produced alongside the Government's proposed planning reforms.
- 1.4 Our dedicated Growth and Delivery Team continue to work proactively to support delivery of sites in the borough. The Council also continues to progress its New Homes Deliver Programme (NHDP)⁵, which aims to deliver 600 new homes developed on sites owned by the Council.

¹ https://planningconsult.rbkc.gov.uk/consult.ti/NLPR_Issues/consultationHome

² https://planningconsult.rbkc.gov.uk/NLPR_landO/consultationHome

³ <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/statement-community-involvement>

⁴ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

⁵ <https://www.rbkc.gov.uk/housing/new-homes-consultation/housing/new-homes-consultation/new-homes-delivery-programme>

- 1.5 The Government published the results of the 2020 Housing Delivery Test in January 2021. This considers the last three-year monitoring period and measures the number of homes built (completed) against the housing target. The results of the 2020 HDT indicated that the 814 new homes built and delivered in the Borough between 2017 and 2020 is just 49% of those required by our housing targets. As such the Council has not passed the test and the presumption in favour of sustainable development now applies. As required by National Planning Policy Framework (NPPF) paragraph 76 this Action Plan has been prepared *“in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.”*
- 1.6 Our adopted Local Plan, (2019) sets out a strategy for boosting housing delivery and allocation of new sites to bring forward new residential development. In addition, the Community Housing Supplementary Planning Document (SPD) was adopted in June 2020 and sets out guidance to deliver more affordable homes in the borough in line with the London Plan.

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

- 1.7 The National Planning Policy Framework 2019 (NPPF) and National Planning Policy Guidance (NPPG) introduced the ‘Housing Delivery Test’ (HDT) in a phased approach over three years. With the publication of the 2020 HDT in January 2021 this transition period is now over. The HDT carries the following consequences:
- The publication of an action plan if housing delivery falls below 95% of a local planning authority’s adopted housing requirement over the previous three years.
 - A 20% buffer on a local planning authority’s five-year land supply if housing delivery falls below 85% of the adopted housing requirement (this in effect would require the Council to find additional sites for an additional 20% of the housing requirement).
 - The ‘presumption in favour of sustainable development’ in the NPPF would apply automatically if housing delivery falls below 75% of the adopted housing requirement, once transitional arrangements have ended in November 2020.
 - Where a new housing requirement is adopted after the publication of the measurement, the HDT calculation will be re-run using the new requirement as set out in paragraphs 17 to 18 of the Housing Delivery Test rule book. With the adoption of the London Plan 2021, the new housing target of 448 new homes per year, will apply in the future.

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

What is the purpose of this Document?

- 1.11 The action plan is required to be produced where housing delivery is below 95% of housing requirement. The latest 2020 Housing Delivery Test published in January 2021 shows that only 49% of the required homes were built in the borough over an average of the past 3 years.
- 1.12 The House Delivery Test: 2020 measurement result:

2017-18	2018-19	2019-20	Total number of homes delivered	Total number of homes required	Total number homes	HDT: 2020 Consequence
317	51	446	814	1,678	49%	Presumption Buffer

1.13 This Action Plan is the Council's response to the challenge set out in the Government's NPPF to boost significantly the supply of homes and has the following aims:

- To set out what actions the Council can take to increase the rate and number of homes built in Kensington and Chelsea.
- To consider any reasons why an under delivery of homes has occurred in the Borough.

2. Past Performance on Housing Delivery

How many homes have been built in Kensington and Chelsea?

- 2.1 The number of homes built in Kensington and Chelsea over the last decade has fallen short of the Borough's adopted housing targets. The Council's housing targets are set by the London Plan and are derived from an assessment of the Council's capacity to deliver additional housing (i.e. the developable land available).
- 2.2 In July 2019 the Council received the Inspector's Report to the examination of the Local Plan, which confirmed that the Council could demonstrate a five-year housing supply up to 31 October 2020 (NPPF paragraph 73, footnote 38). Since 2010, 3,080 new homes have been built.
- 2.3 The Council has produced an updated housing trajectory as part of our 2020 Annual Monitoring Report (AMR)⁶. This confirms supply for the next fifteen years including for the first five years.
- 2.4 In the 2019/20 monitoring period 25 (net) new homes were granted planning permission, and a total of 511 new homes have been completed.

Table 1: Housing Approvals and Completions Vs Housing Targets RBKC 2010-2020

	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Housing supply target	600	600	600	600	600	733	733	733	733	733	6,665
New residential approvals	783	860	244	1292	1303	252	459	177	296	25	5,691
Net residential completions	175	102	65	264	982	341	190	335	115	511	3,080

Source: RBKC Annual Monitoring Report 2020

⁶ [Monitoring reports | Royal Borough of Kensington and Chelsea \(rbkc.gov.uk\)](https://www.rbkc.gov.uk/monitoring-reports)

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

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

Adopting the Local Plan in September 2019 with additional site allocations and new planning policies that will boost housing delivery and ensure the right sizes, types and tenure of homes are built.

2.6 Policies boosting housing delivery include:

- Site allocations in the Local Plan. The Council has identified sites capable of delivering a minimum of 6,559 new homes on land suitable for housing development.
- New affordable housing policies, which incentivise the delivery of a minimum of 35% affordable homes by reducing the need to submit a viability assessment for developments meeting this target, in line with the Mayor of London's 'Threshold Approach'. This policy seeks to boost the amount of community housing built in Kensington and Chelsea and helps speed up decision making while reducing the cost and burden of evidence required from developers providing 35% affordable housing.
- Adoption of RBKC Community Housing SPD in June 2020 which provides guidance on the delivery of more affordable homes in new developments.
- Amendments to the Employment Zone policy allowing some residential uses in certain circumstances.
- A new stricter policy to limit the loss of homes through the amalgamation of properties.
- Amending the housing policies to ensure that sites optimise the number of homes delivered.

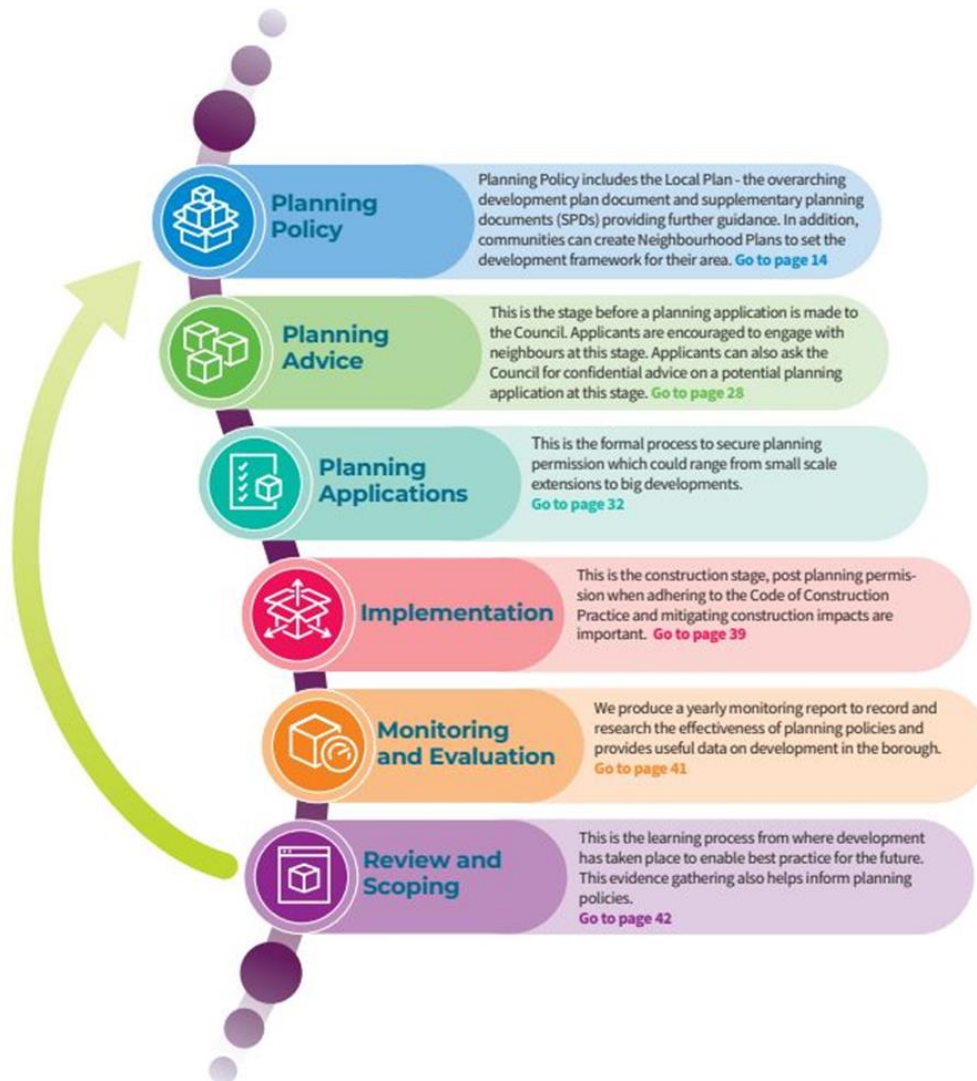
Statement of Community Involvement

2.7 A Statement of Community Involvement (SCI) document⁷ was published in February 2020 that aims to set out the way in which we will involve residents, businesses, community groups, investors and other stakeholders on planning matters.

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

⁷ <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/statement-community-involvement>

Figure 1: Spine of Planning

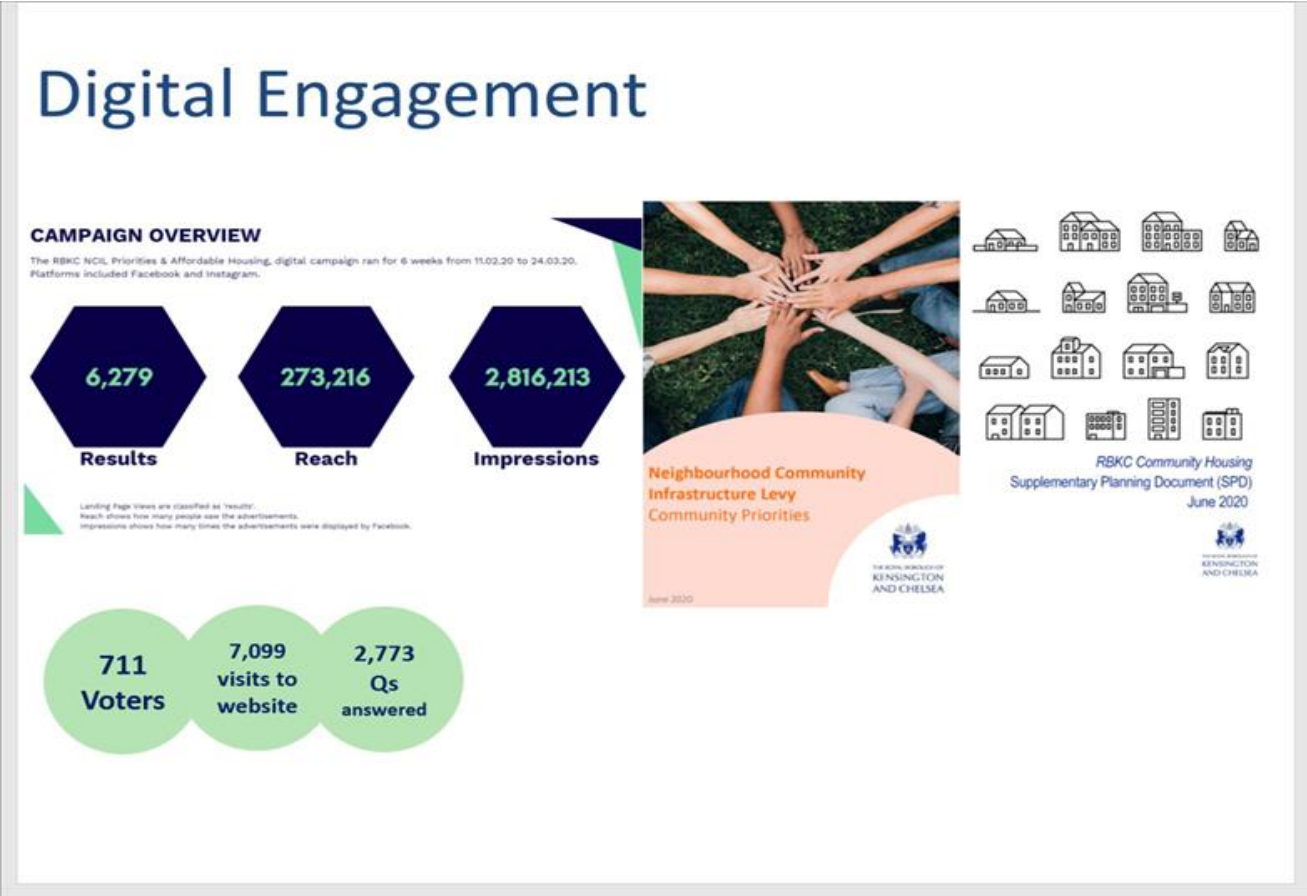


Digital Engagement

- 2.9 The key changes to consultation techniques is reaching out to our communities through digital engagement. Although traditional methods may still be used, the majority of engagement is now done via online communication which has proven more effective and engaging in promoting planning policy consultations and opportunities to discuss major planning applications.
- 2.10 The Build-ID advertises on social media (such as Facebook, Instagram) and is clear, engaging and quick to use. For example, in 2020 we consulted on the RBKC Community Housing SPD. We used digital consultation to supplement and as a result our consultation reached (was seen by) 273,216 people, 2,816,213 people clicked on the link which resulted in 6,279 people responding to the consultation. Figure 2 shows the overall results as an example of the successful digital engagement used for this policy document. We have since

continued to utilise digital engagement to help reach the widest audience in our consultation, including on the NLPR Borough Issues and Issues and Options.

Figure 2: Results using Digital Engagement



Growth and Delivery Team

2.11 The Growth and Delivery Team was set up in 2020 to promote good growth through proactive planning and is responsible for major projects that focus on site delivery and good community engagement. This includes work on the Council’s two Opportunity Areas, the Council’s new homes delivery programme, site briefs for other key sites and delivering capital projects delivering high social value.

Efficient Decision Taking

2.12 The data on deciding planning applications shows that the Council functions efficiently. This has been confirmed by the general feedback from agents and developers. Table 2 below indicates that from January 2020 to June 2021 100% of major applications were determined in time. Although a dip in the number of minor and other applications can be seen between Q1 and Q2 2020, falling from 75% to 56%. The data for Q3 and Q4 2020 and Q1 2021 demonstrates that this dip has been correct, with the number of applications

determined in time rising back to 75%. The speed of decision making is therefore typically very good and delays in the system are minimal. The dip in minor applications determined on time can be directly attributed to the impact of the Covid-19 pandemic and the lockdown restrictions, which caused a significant change in working practises across the country. The data demonstrates that the Development Management team has adapted to this challenge and the percentage of minor applications determined in time has returned to near pre-Covid levels.

Table 2: Percentage of applications determined in time using the PS1 and PS2 returns submitted to MHCLG each quarter.

Quarter	% of minors and others in time	% of majors in time
Jan. to Mar. 2020 (Q4)	74	100
Apr. to Jun. 2020 (Q1)	57	100
Jul. to Sep. 2020 (Q2)	56	100
Oct. to Dec. 2020 (Q3)	61	100
Jan. to Mar. 2021 (Q4)	64	100
Apr. to Jun. 2021 (Q1)	75	100

Reducing uncertainty and minimising risk for developers

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

Good Communication with Landowners, Developers and Agents

- Working collaboratively with neighbouring and upper tier authorities where applicable to address strategic level issues, such as infrastructure or transport related issues.

Good early Communication with our Residents and Communities

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

Lowering burdens for developers

- The Planning Department has set in place a review mechanism to scrutinise the conditions applied to planning permissions before they are granted by the Council. This review ensures that unnecessary burdens are not placed on development proposals.
- The conditions review has also considered the trigger points for discharging these conditions. This has led to a particular focus on reducing the number of conditions that must be dealt with prior to development commencing.
- The wording of the standard conditions that are applied to permissions has also been reviewed to ensure that the conditions are necessary, relevant, enforceable, precise and reasonable in all cases.

3. Sites Monitoring

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

3.1 The Council has undertaken the following actions to gather evidence on housing delivery.

- Conducted a housing completions survey in August 2021, to determine the number of homes completed in the borough.
- Previously written letters to agents on sites delivering 5+ net dwellings in the pipeline of sites with planning permission.
- Set up meetings with agents representing numerous sites in Kensington and Chelsea.
- Presented to the Agents' Forum.
- Gathered evidence from Development Management Team Leaders and officers.
- Reviewed s106 payments and trigger points.

4. Barriers to Housing Delivery

Barriers / Issues Identified

Covid19

- 4.1 The devastating impacts of Covid19 has meant uncertainty in terms of planning and housing delivery this year, which has impacted the delivery of housing not only short term but long term. The Council is still progressively working towards recovery from this pandemic and understanding the impact it will have on the housing market in the short- and longer-term effect on housing delivery in the borough.

Lack of available land / sites

- 4.2 We have a shortage of available development land in Kensington and Chelsea. There are only a small number of sites capable of delivering significant amounts of additional housing and we must make sure that where opportunities exist to deliver housing, we take them. There is little scope to alter the mix of sites allocated or increase the amount of land earmarked for development where delivery falls below our targets without defeating other objectives of the Local Plan, such as supporting the local economy. The Council's housing targets are derived from the amount of land that can be developed (i.e. the capacity for new homes) rather than from an assessment of the need.
- 4.3 The lack of available land means we must work hard to bring forward housing development on the few sites we do have. This means taking difficult decisions to get difficult sites moving and being proactive in searching for additional windfall opportunities including options for more mixed use development. Delivery of the Opportunity Areas, namely Earl's Court and Kensal Canalside Opportunity Area, are very important to our future housing delivery and these sites should be prioritised and resources brought to bear to unblock any identified barriers. The Council can also bring forward our own sites with public consultation and engagement with a greater certainty of delivery.

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

- 4.4 Kensington and Chelsea is characterised by a finely grained historic street pattern with an outstanding building stock of Georgian and Victorian town houses and Edwardian mansions blocks. Over 70 per cent of the borough is designated a conservation area and there are over 4000 listed buildings. With the exception of a few clusters of tall buildings, the majority of the borough has a relatively homogenous and level roofscape. The primary character of the borough is residential with some well-defined town centres and supporting offices uses.

- 4.5 There are relatively consistent building heights ranging from 2-3 storey terraces in North Kensington and Lots Road to 5 storey Georgian and Victorian terraces and townhouses with pockets of up to 8 storey Victorian and Edwardian and 1930s mansion blocks. Opportunities for significant intensification of existing sites are therefore limited.

Site Specific Issues

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

Landowner / Developers' Circumstances

- 4.7 Individual circumstances of the landowners and developers impact the speed at which sites get built out. Issues that create barriers to homes being built are:
- Business model of the landowner – whether or not they intend to build themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission.
 - Access to finance and cost of interest payments.
 - Land value expectations.
 - Extent of the freeholder / leaseholder motivation to develop the site.

S106 Contributions and Viability Concerns

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

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

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

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

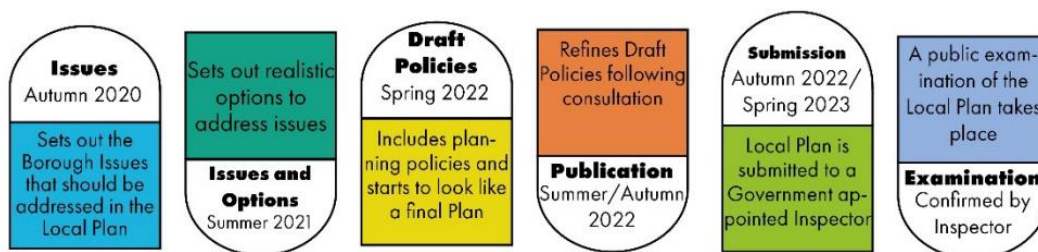
5. Future Actions

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

1. Delivery of New Local Plan Review

- The NLPR will include detailed policies and more site allocations. It will set out a vision and a framework for future development for the Borough, addressing needs and opportunities for housing, the economy, social and community facilities, transport, addressing the climate change emergency, securing good design conserving historic environment and providing necessary infrastructure to support development.
- Undertaking another “call for sites” through this process to identify more sites for housing.
- Updating our evidence of need through further studies, allocating more sites, looking at further optimisation of land with improved design, looking for good growth to meet and exceed our housing targets.
- We acknowledge the recent proposed changes to planning in the White Paper and are ready to produce our Local Plan alongside the planning reforms.
- Community Engagement and building consensus will play a big part in preparing the NLPR which will support more housing delivery in the borough and housing needs. It will also help drive the post-Covid-19 recovery.
- Address the Government’s inclusive growth agenda and see the delivery of some 4,500 new homes across the Borough in the next ten years.

Figure 3: NLPR Process and timeframes



Actions

- **Through the NLPR “call for sites” and the Character Study identify sites and opportunity for development in the Borough.**
- **Engage with landowners to establish site deliverability.**

- **Proactively promote any identified sites (either through allocation, discussions with landowners or the production of planning briefs).**

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

- The New Local Plan relaxed restrictions within Employment Zones and allows additional residential development to come forward as part of a mix of uses where the business function of the Employment Zone is not harmed. This is a relaxation of the previous policy which sought to resist the introduction of any residential uses in these locations.
- The emerging Local Plan may take this further, as we look to revisit the contribution that our Employment Zones can have in meeting housing needs, whilst retaining their character as important concentrations of employment. This approach will reflect development economics and the amount of residential floorspace which may be necessary to allow redevelopment of sites within our Employment Zones.

Actions

- **The Council has commissioned an Employment Land and Premises Study (ELS) to consider the need for new office and industrial floorspace over the lifetime of the Plan.**
- **The draft ELS was published with the RBKC New Local Plan Review Issues and Option Consultation paper in July 2021. This concluded that there remains a need for between 50,000 sq m to 76,000 sq m of office floorspace to 2043.**
- **The draft ELS does not support the wholesale release of business land. However, it does promote residential led mixed use development to both increase housing supply and maintain the delivery of additional business floorspace.**
- **The ELS will also consider ways to promote best practice on mixed office and residential schemes.**

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

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

- The St Quintin and Woodlands Neighbourhood Plan is the second Neighbourhood Plan to pass a referendum successfully.
- The Latimer Road Design Code SPD⁸, which was one of the actions coming from the Neighbourhood Plan, was published in draft for a six-week public consultation from 8 April to 23 May 2021. The final SPD will be planned for adoption soon in September 2021.
- Redevelopment at this site was approved through a majority vote in the neighbourhood area and therefore enjoys local support as part of the neighbourhood plan process. It is also an example of the type of windfall site that might come forward as part of the sites survey action.
- The Latimer Design Code SPD was the product of joint working between the Council and the St Quinton and Woodlands Neighbourhood Forum to provide a design code on how to successfully deliver mixed business uses (B1/B2/B8) and Residential (C3) in Kensington. We consider that this project provides a case study of best practice in terms of delivering design codes.

Actions

- **Council to adopt Latimer Road Design Code SPD in Autumn 2021.**

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

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

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

- The Council resolved to grant planning permission subject to legal agreement on 10 November 2020 for four individual sites comprising Phase 1 of the New Homes Delivery Programme (NHDP), which is a Council commitment to deliver 600 new homes, 300 of which are to be at social rent.
- The grant of planning permission will see these four sites deliver a total of 97 new homes (96 net uplift) which includes 26 Market, 49 Social Rent, and 22 Discounted LLR.

⁸ <https://planningconsult.rbkc.gov.uk/connect.ti/LatimerRdDC/consultationHome>

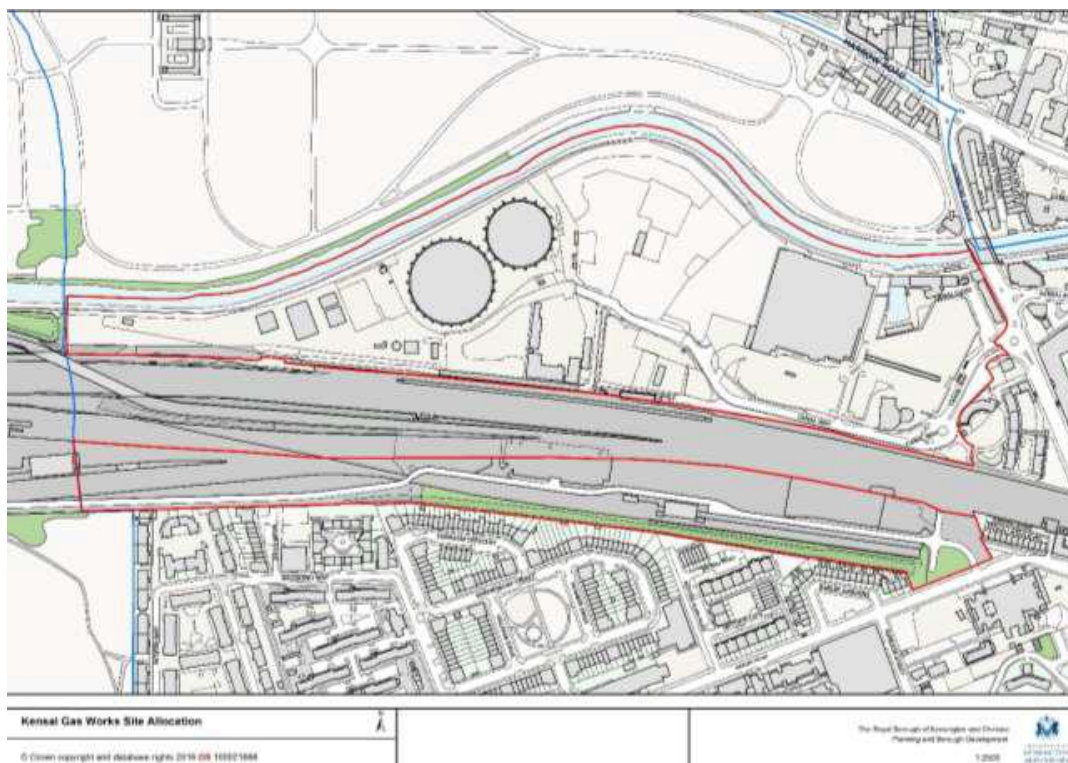
- In habitable room terms this is a total 271 habitable rooms (67 market, 146 social rent, 58 discounted London Living Rent), a total of 75% affordable homes overall by habitable room.
- Work to implement and begin delivering these new homes began in early 2021 with construction started on three of the four sites (Hewer Street, St Helens Gardens and Kensal Road).
- The NHDP identified the opportunity to consider an additional three sites which could form Phase 2⁹ of the programme. These potential Phase 2 sites are all located in the north of the Borough and are owned by the Council. Public consultation on these began in October 2020 and is still ongoing.

Actions

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

4. Prioritise the delivery of key sites

Kensal Canalside Opportunity Area



⁹ <https://www.rbkc.gov.uk/housing/new-homes-consultation/housing/new-homes-consultation/new-homes-delivery-programme/new-homes-delivery-programme-phase-2-sites>

- Kensal Canalside OA is the last remaining undeveloped site in the borough. The site has been allocated for a minimum of 3500 homes which represents nearly five years of future supply in the borough. The site will make by far the largest contribution to future housing supply in Kensington and Chelsea. The site does not have an existing planning permission.
- The Growth and Delivery Team was set up to promote good growth through proactive planning and is responsible for major projects that focus on site delivery and good community engagement. Speeding up delivery at Kensal Canalside can go a long way in closing the gap between the number of houses built and the nominal housing target for the borough. The Growth and Delivery Team are managing the delivery of the Kensal Canalside SPD. A draft of which was published in April 2021 and was open for public consultation between 12 April and 24 May. The SPD was subsequently adopted by the Council on 7 July 2021.

Progress and delivery timeframes

- Adoption of an SPD for the site in close collaboration with the main landowners that promotes the delivery of a high quality, high density, new neighbourhood that deliver new homes and jobs for the local community, including a high proportion of Community Housing (Affordable Housing). The SPD also promotes the quick delivery of high-quality schemes on the site.
- Early engagement on the site – engagement throughout 2019, including drop-in sessions in March 2019, workshops and developer led site visits in July 2019 and two rounds of Built ID polls.
- Further engagement on SPD content – Autumn 2020.
- Draft SPD published in April 2021 with associated public consultation running from 12 April to 24 May 2021.
- Adoption of SPD in July 2021.
- Develop a new site allocation in the NLPR.

Barriers to delivery

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

- Multiple landowners with differing interests
- High cost of required infrastructure and the need to fund this upfront
- Large sites with long lead in times
- Land contamination
- Poor accessibility of some sites given the densely built-up nature of the

borough

Earl's Court Opportunity Area

- The acquisition of Capco's interest in the site by Delancey (on behalf of Dutch pension fund APG) has resulted in a real opportunity to see this site come forward. There is consensus that this needs to happen and there is political will to make it happen.
- We are delighted a new owner is on board with ambition to resolve and deliver this site.
- This site presents one of the few opportunities in the borough to deliver a significant amount of housing and affordable housing and therefore we welcome ECDC's commitment to delivering development on this site.
- The developer is preparing an entirely new masterplan, and we are working closely with them to ensure it aligns with our priorities.
- The developer has appointed the principal masterplan architects for the site, Hawkins Brown and Studio Egret West which will be a 50/50 collaboration between the two architecture firms.
- We are currently making steps towards confirming a programme, or road map, from now to determination of a planning application.
- We will collaborate with LBHF and the GLA to ensure a joined-up approach to this site, whilst ensuring the development meets the needs of RBKC and its residents and businesses.
- A new site allocation will be developed for the NLPR. The programme for Earl's Court will be aligned with this new site allocation.
- Priorities for RBKC are:
 - Residential led but genuinely mixed-use development which significantly contributes towards meeting our housing needs
 - Delivery of on-site affordable housing
 - A significant replacement cultural facility
 - a site of this size must also deliver a mix of uses to meet the overall aims of the Council. We also expect to see employment, cultural uses and tangible economic benefits for the borough and its residents and businesses.
 - We support a highly sustainability and innovative solution

- We will expect the developer to demonstrate exemplar community engagement and collaboration in drawing up their masterplan. It is vital the community are involved in the process at every step and involved in a meaningful way.

100/100A West Cromwell Road

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

Heythrop College

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

Lots Road

- Proactively looking at site delivery and promoting relocation of some operational use. Promoting a Supplementary Planning Document, including a Design Code, for the Lots Road site where the Council has a number of land ownerships, in order to optimise delivery of new homes across the sites.
- Early engagement on Site Brief design code for main site (Lots Road South) – planned for September 2021
- Draft SPD – January 2022
- Adoption – April 2022

Royal Brompton Hospital

- We adopted an SPD in May 2021 which focuses on the retention of medical use on the site, recognising the need for enabling development and the opportunity for the delivery of an appropriate scale of new homes.
- The Council consulted on the draft SPD for six weeks from 18 November and 30 December 2020.

Newcombe House

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

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

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

Actions

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

6. Further Review of Planning Conditions

- 6.1 The imposition of particular conditions, the stage of development they are imposed and the time it takes to sign off conditions were issues raised by

planning agents as a factor causing some delays to development commencing on particular sites.

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

- Consider whether detailed materials and landscaping conditions need to be discharged prior to commencement.
- Consider ways of reducing the time it takes to sign off pre-commencement conditions including any resource bottlenecks.

7. Summary of Key Actions

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