

Housing Delivery Action Plan

December 2020



A decorative graphic consisting of four overlapping circles of different colors: a large light grey circle at the top right, a medium teal circle overlapping its bottom right, a large dark grey circle overlapping the bottom left of the teal circle, and a small teal circle overlapping the bottom left of the dark grey circle.

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1. Introduction

1.1 The purpose of this document is to identify the reasons for under-delivery of housing within Waverley Borough and explore the ways to reduce the risk of further under-delivery over the forthcoming year and sets out measures for improving the levels of housing delivery in the Borough.

1.2 Paragraph 75 of the National Planning Policy Framework (NPPF) states:

“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years”

1.3 The Housing Delivery Test was published on 13 February 2020 and Waverley achieved a result of 85%. As the result was lower than 95% the Council is required to prepare a Housing Delivery Action Plan (HDAP). Further guidance regarding the preparation of the HDAP is provided in the National Planning Policy Guidance (NPPG) and extracts from the relevant paragraphs can be found at Appendix 1.

2. Planning Policy Context

2.1 The Government White Paper, Fixing our Broken Housing Market (published by DCLG in February 2017) outlined the Government’s proposals for increasing the number and speed with which dwellings are delivered. The paper outlined the Government’s proposals to introduce the Housing Delivery Test on a phased basis and where local authorities under-deliver on their housing, they will be required to produce an Action Plan detailing how delivery will be increased in their area.

2.2 The requirements for Local Authorities to prepare a Housing Delivery Action Plan was introduced into a previous version of the National Planning Policy Framework (NPPF) in July 2018. This requirement has remained in the current version of the NPPF, published in February 2019.

National Planning Policy

2.3 The National Planning Practice Guidance (NPPG) also contains guidance about preparing a Housing Delivery Action Plan. The relevant paragraphs are detailed in Appendix 1.

Local Planning Policy

- 2.4 Waverley Borough Council adopted Local Plan Part 1: Strategic Policies and Sites on 20 February 2018. This document includes the strategic policies for development in the Borough. Policy ALH1 of the Local Plan Part 1 concerns the amount and location of housing to be delivered between 2013 – 2032. It makes provision for at least 11,210 net additional homes in the period 2013 to 2032, equivalent of 590 homes per annum. The housing target was based on meeting Waverley Borough’s objectively assessed need for housing and part of Woking Borough’s unmet need. Therefore, of the overall housing requirement for 590 dwellings per annum (dpa) 83 dpa is the contribution towards meeting the Woking unmet need. The housing target takes into account the need for affordable housing and the affordability of market dwellings within the Borough.
- 2.5 In addition to setting the overall housing requirement for the Borough over the Plan Period of 2013 – 2032 Local Plan Policy ALH1 also allocates a minimum number of dwellings to be delivered during the plan period for the main settlements and a number of the villages.
- 2.6 Local Plan Part 1 also contains a number of strategic site allocations which will contribute towards meeting the Borough’s housing need.
- 2.7 The Pre-Submission version of Local Plan Part 2: Site Allocations and Development Management Policies was published in November 2020. This includes housing allocations for Haslemere and Witley (including Milford) and includes detailed development management planning policies.

Neighbourhood Plans

- 2.8 Currently there are two made Neighbourhood Plans in Waverley, covering Farnham and Godalming. The made Farnham Neighbourhood Plan includes site allocations, whereas the made Godalming Neighbourhood Plan does not include any allocations. The Witley Neighbourhood Plan has also undergone independent examination and it has been determined by the Council that it should go to referendum.
- 2.9 In addition, there are a number of other Neighbourhood Plans under preparation and Table 1 provides an overview of current progress.

Table 1 – Current Progress with Neighbourhood Plans

Information correct as of November 2020

Neighbourhood Plan	Current Stage	Allocations
Alfold	Plan preparation.	No
Bramley	Completed Regulation 14 consultation.	Yes
Busbridge	On hold.	No

Neighbourhood Plan	Current Stage	Allocations
Chiddingfold	Currently consulting on the Publication Draft Neighbourhood Plan.	Yes
Cranleigh	The Examination of the Neighbourhood Plan is currently suspended.	Yes
Dunsfold	Plan preparation.	Yes
Elstead and Weyburn	Completed Regulation 14 consultation.	Yes
Ewhurst and Ellens Green	Completed Regulation 14 consultation.	No – the minimum allocation has been met through completions and planning permissions that have been granted.
Farnham	Neighbourhood Plan has been made.	Yes
Godalming	Neighbourhood Plan has been made.	No – the minimum allocation has been met through completions, planning permissions and estimated windfalls.
Hascombe	On hold.	No
Haslemere	Completed Regulation 14 consultation.	No – allocations through LPP2
Witley	Following Independent Examination will be going to referendum.	No – allocations through LPP2

3. Planning Permissions and Completions

3.1 Table 2 details the number of new dwellings granted planning permission since 1 April 2013.

Table 2 – Number of Dwellings Permitted Per Year

Year	Number of planning permissions for dwellings granted per annum
2013/14	405
2014/15	698
2015/16	470
2016/17	1,034
2017/18	2,938

Year	Number of planning permissions for dwellings granted per annum
2018/19	2,095
2019/20	549
Total	8,189

3.2 As the table shows, a significant number of these new homes have been granted planning permission over the last four years. Many of the planning permissions granted during this time period relate to major residential schemes (of 50 + dwellings) including:

- Former Garden Style Nursery, Wrecclesham – 72 dwellings
- The Woolmead, East Street, Farnham – 138 dwellings
- Hewitt’s Industrial Estate, Elmbridge Road, Cranleigh – 120 dwellings
- Land at West Cranleigh Nurseries and North of Knowle Park between Knowle Park and Alford Road, Cranleigh –265 dwellings
- Land between New Way and Aarons Hill, Godalming – 262 dwellings
- Land Opposite Milford Golf Course, Milford – up to 200 dwellings
- Dunsfold Aerodrome – 1,800 dwellings
- Land East of Loxwood Road, Alford – 80 dwellings
- Land at Alford Garden Centre, Alford – 56 dwellings
- Land East of Loxwood Road, Alford – 80 dwellings
- University for the Creative Arts, Farnham – 252 student bedrooms (the equivalent to 101 C3 dwellings)

3.3 A significant proportion of the planning permissions for new homes are on large sites as Table 3 shows. Large sites are defined as sites delivering ten or more dwellings.

Table 3- Net Number of Dwellings Permitted on Large Sites Per Year

Year	Net number of dwellings permitted on large sites
2013/14	195
2014/15	522
2015/16	1,030
2016/17	761
2017/18	2,398
2018/19	1,093
2019/20	420

3.4 Delivery of completed dwellings on large sites often takes longer than on small sites due to a range of factors, including time taken to clear complex planning conditions and delivering the infrastructure required to support development on the site. In recent years the Council has granted planning permission for a large number of additional homes but this does not always translate into homes being delivered as some planning permissions will not be implemented. The Housing Land Supply and Housing Trajectory Contextual Note (2017) prepared by Troy Planning and Design notes that it can take between 9 and 19 months to complete the first dwelling following the grant of planning permission and that in some cases it can take much longer. Table 4 below, which sets out the number of completions each year.

Table 4 – Number of Completions Per Annum

Year	Number of dwellings completed
2013/14	143
2014/15	242
2015/16	342
2016/17	321
2017/18	512
2018/19	346
2019/20	593

3.5 Further information regarding progress with the development of major sites, including anticipated build-out rates, is included within the Council’s Five Year Housing Land Supply Position Statement (published in 2020). This highlights the fact that a significant number of these major sites have a detailed planning permission and construction is currently taking place on a number of these sites.

4. Housing Delivery Action Plan 2019

4.1 In December 2019, Waverley Borough Council published its first Housing Delivery Action Plan. Part 5 of the HDAP lists the actions the Council planned to instigate with a view to improving housing delivery within the Borough. The table below provides an update on progress with completion of the actions.

Table 5 – The Actions from the Housing Delivery Action Plan 2019 and Update on the Work Undertaken to Achieve the Action

	Action	How will the Action be Implemented?	Timescales for Implementation	Update on work undertaken to achieve the action
1	Report quarterly on residential commencements and completions.	<ul style="list-style-type: none"> The data will be published in the Council's Quarterly Performance Report. 	Results will be provided on a quarterly basis for the year.	Quarterly data for commencements and completions has been provided and included in Quarterly Performance Reports.
2	Review with WBC's Legal Services Department with a view to improving the speed of preparing and signing S.106 Agreements.	<ul style="list-style-type: none"> Hold a meeting between WBC's Development Management Team and Legal Team to discuss and review the current process and timescales for the preparation and signing of S.106 Agreements. Work together to identify any issues regarding the process used by WBC for negotiating and signing S.106 agreements. 	Arrange and attend a meeting during January 2020. Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand	In response to the concerns raised about the length of time for S.106 agreements to be signed, the Council is now outsourcing S.106 work to a third party as and when required. At this stage it is too early

		<ul style="list-style-type: none"> • Work with officers in WBC to agree if any changes should be made to the process for signing S.106 agreements. 	alone progress report will be prepared.	to say whether or not this is having a positive impact on the speed at which S.106 agreements are being signed.
3	Establish regular dialogue with the development industry through the creation of a Developers Forum.	<ul style="list-style-type: none"> • Aim to create two groups within the Developers Forum, one catering for the national housebuilders and a separate group to discuss delivery matters with smaller scale developers. • Identify invitees for each group within the Developers Forum. • Set up and hold meetings every 6 months to establish any barriers to delivery and seek to address these. 	Developers Forum to be established by end of January 2020. First meeting to be held by March 2020.	The Council still plans to establish a Developers Forum for Waverley and has joined the Surrey Developers Forum to discuss strategic planning matters affecting all Surrey authorities.
4	Examine the possibility of improving the Council's response to preapplication requests – focusing on responses from internal and external consultees.	<ul style="list-style-type: none"> • Identify which consultees are taking the longest to respond. • Attend meetings with internal consultees to explore the timescales for providing preapplication responses. • Work together to identify and implement any changes required. 	Arrange and attend a meeting during January 2020. Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.	The Council has reviewed the response times and quality of feedback received from all consultees. A weekly design surgery has been established to provide design advice at the pre-application stage.

				<p>The Council has also identified Natural England and Surrey Wildlife Trust as taking the longest amount of time to respond to consultation requests. Work has already commenced on agreeing a methodology with Surrey Wildlife Trust with a view to speeding up response times.</p>
5	<p>Measure the effectiveness of Planning Performance Agreements on small and large sites</p>	<ul style="list-style-type: none"> • Identify the current planning applications with Planning Performance Agreements. • Monitor the length of time taken to agree Planning Performance Agreement, grant planning permission, discharge of conditions, commencement on site and completion of dwellings on the site with a PPA and compare this to the average time taken for small and large sites without Planning Performance Agreements. • Examine the ways in which Planning Performance Agreements can be used to expedite delivery. This will be discussed and explored with the 	<p>This is an ongoing action and the results will be published in next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.</p>	<p>The Council has signed a couple of PPAs. One for Dunsfold Park and the other for the West Cranleigh Nurseries site. The Dunsfold Park PPA has been effective in terms of allowing a more extensive level of engagement between the Council, Surrey County Council and the developer at the pre-application stage and providing preapplication feedback more promptly. The PPA for</p>

		Developers Forum, once established.		<p>the West Cranleigh Nurseries site has enabled planning applications to be validated more swiftly than if a PPA had not been agreed and for decisions to be issued more quickly due to the mutually agreed timetable.</p> <p>Additional benefits are anticipated as both developments progress.</p>
6	Pro-actively monitor delivery on major sites in Waverley Borough Council to identify potential barriers to delivery.	<ul style="list-style-type: none"> Analyse pre-commencement conditions attached to planning applications to ensure their necessity. This will apply to planning permissions for large residential developments (i.e. 5 or more net dwellings). Identify which particular precommencement conditions take the longest time to discharge and identify opportunities to reduce this. Monitor the length of time taken to discharge planning conditions attached to consent for major 	To be completed between December 2019-January 2020.	<p>Planning policy officers reviewed planning permissions of 10+ dwellings granted since January 2018 to ascertain which precommencement conditions took the longest to discharge. The findings of the research indicate that there are no hard and fast rules about how long pre-commencement</p>

		schemes and a sample of smaller schemes.		conditions take to discharge. Instead the length of time seem to depend on the quality and level of detail provided by the applicant and the type of site and the proposals. As the findings did not identify any clear answers to the issue it is not proposed that the action is carried forward to the 2020 Action Plan
7	Examine the potential for more dedicated planning guidance that may assist in reducing the overall timescale from preapplication through to discharging conditions (eg. appropriate use of materials in new residential developments).	<ul style="list-style-type: none"> • Review existing supplementary planning documents • Identify whether any additional supplementary planning documents are required • If so, prepare a timetable for the preparation of the supplementary planning documents 	To be completed by 1 October 2020. Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.	The Council has reviewed existing supplementary planning documents and identified several areas where it would be beneficial to have additional planning guidance particularly in relation to climate change and biodiversity. The Council will shortly be commencing work on a Climate Change SPD is

				currently under preparation and a biodiversity checklist is currently being prepared.
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5. Potential Barriers to Housing Delivery

- 5.1 Waverley Borough Council has been granting a large number of planning permissions for residential development as demonstrated in Section 3. The recent changes to planning legislation should also support an increase in the speed of housebuilding by extending time limits for the implementation of planning permissions. This removes the need for developers to reapply for planning permission. Recent changes to legislation also enable the change of use of vacant buildings and the addition of extra storeys on some existing residential and commercial premises.
- 5.2 Although the Council has received a number of applications for the change of use of vacant buildings, the delivery of new homes on the ground appears to continue to lag behind.
- 5.3 The paragraphs below provide an overview of the perceived constraints to the delivery of new homes in Waverley. They have been divided into those that are largely outside the Council's control and those where the Council could have influence.

Issues that are largely outside the Council's control

Turbulence in the Housing Market

- 5.4 As part of their response to the Council's request in early 2019 for information regarding the delivery of sites, some developers had noted that turbulence in the housing market as a factor for slower delivery rates. Whilst the Council acknowledges that delays surrounding Brexit and the Covid-19 pandemic have resulted in uncertainty in the housing market, the Council has very limited powers to improve local market certainty for both investors and potential purchasers and thereby speed up delivery.

Land Ownership

- 5.5 In some cases, outline planning permission is sought by landowners with a view to selling the site to a developer. Delays can occur between securing outline planning permission and the subsequent submission of reserved matters applications whilst land ownership and other legal matters are resolved.

Site Constraints

- 5.6 Developers have said that site constraints such as contamination can delay delivery of dwellings. Whilst site specific constraints are largely matters for the landowner and developer to address, the Council will work with developers, where possible, to identify opportunities to overcome constraints and allow the development to proceed.

Approach Used to Secure Planning Permission

- 5.7 Securing planning permission via the outline/reserved matters route can often take longer than via a full planning permission. In some cases, the submission of an outline planning permission is necessary, particularly if the application site is large or multiple developers will be building the dwellings.
- 5.8 However, it does mean that the time between outline planning permission being granted and the first dwellings being completed can be longer than if planning permission were granted via a single full planning consent. Unfortunately, the Council cannot specify the method used by developers to secure planning consent.

Amendments to Planning Permissions

- 5.9 The submission of S.96A and S.73 applications following the grant of planning permission can often consume a considerable amount of officers' time and results in delays in the delivery of dwellings.

Matters that the Council Can Seek to Influence

Efficiency of the Council's Pre-Application Service

- 5.10 Depending upon the site and nature of the proposals, the Council consults with internal and external consultants regarding site specific issues. In some cases, there can be delays in receiving the information from internal and external consultees and this can result in delays in giving pre-application advice. Natural England and the Surrey Wildlife Trust have been identified as often taking the longest time to respond to pre-application consultations. Over the past year the time taken for internal consultees to respond has improved and responses are normally received within the required time period. The Council's Development Management team have been working with Surrey Wildlife Trust to develop a matrix and standing advice to reduce the workload for the Surrey Wildlife Trust. This in turn will speed up their response time. Work is still ongoing with the matrix and standard advice with the aim of introducing the matrix during 2021.

Time Taken to Sign S.106 Agreements

- 5.11 The Council's Legal Team is responsible for preparing a proportion of the S.106 agreements required whilst the remainder are contracted out. The time taken to prepare and sign a S.106 Agreement will vary depending on a range of factors including the number and complexity of any items to be secured through the legal agreement.
- 5.12 The number of signatories can also be a contributing factor. It is not within the Council's power to dictate the timescales for other parties to sign the legal agreement. However, the Council acknowledges that any delays in completing the legal agreement can have a knock-on effect on the timescale for delivering the housing. To help reduce the timescales for the signing of

S.106 agreements, the Council has sub contracted the work to third party solicitors. This has helped to speed up the process of signing the documents.

Discharging Pre-Commencement Planning Conditions

- 5.13 The Council minimises the number of conditions attached to planning permissions. The use of pre-commencement conditions is also kept to a minimum and only used where absolutely necessary.
- 5.14 Planning Officers have noted that some of the pre-commencement conditions attached to planning permissions can be complex. The Council will need to ensure the applications are assigned to the most appropriate officer.
- 5.15 Whilst the use of pre-commencement conditions is an important and necessary part of the process for agreeing a development, the Council recognises that delays in the discharging of such conditions may impact on the timescales for commencements and completion of the development. Although the Council has sought to investigate the time taken to discharge planning conditions, the length of time associated with the approval of each condition varies from site to site as discussed under Action 6 above.

6. Actions

6.1 The actions set out below focus on more detailed work and research needed to understand why outstanding planning permissions on large sites are taking time to be implemented. They build upon the actions included in the Housing Delivery Action Plan 2019. The results of the work emanating from the actions identified below will guide actions for any subsequent Housing Delivery Action Plans. The Housing Delivery Action Plan focuses on improving customer service and on the use of data to monitor the delivery of dwellings and identify any potential issues.

	Action	How will the Action be Implemented?	Timescales for Implementation
1	Continue participating in the Surrey Developers Forum.	<ul style="list-style-type: none"> Continue to attend Surrey Developers Forum Meetings; 	Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.
2	Establish a Waverley Developers Forum	<ul style="list-style-type: none"> Work towards establishing a six monthly Waverley Developers Forum in 2021; Use the Forum to identify and explore any issues that developers perceive to exist around the delivery of planning permissions. 	Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.
3	To improve the speed and quality of pre-application advice.	<ul style="list-style-type: none"> To work with external consultees to prepare and agree a pro-forma for pre-application advice and seek advice only where absolutely necessary. 	Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing

	Action	How will the Action be Implemented?	Timescales for Implementation
		<ul style="list-style-type: none"> Comprehensively review and repackage the pre-application service together with new charging schedule 	Delivery Action Plan is not required, a stand alone progress report will be prepared.
4	Review how planning conditions for major schemes are handled by the Council.	<ul style="list-style-type: none"> To review the process for discharging planning conditions and the personnel involved with a view to making the process quicker and more efficient. 	Report on progress made as part of next years' Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.
5	Examine in more detail how additional dedicated planning guidance can be prepared which would assist in reducing the overall timescale from pre-application through to discharging conditions.	<ul style="list-style-type: none"> Examine the ways in which Supplementary Planning Guidance relating to the use of materials in new developments and climate change and biodiversity could be prepared and their relationship with the policies in Local Plan Part 1. Begin work on preparing a Sustainability and Climate Change SPD with a view to adopting the document by December 2021. 	Report on progress made as part of next year's Housing Delivery Action Plan. In the event that a Housing Delivery Action Plan is not required, a stand alone progress report will be prepared.

7. Conclusions

- 7.1 The Housing Delivery Action Plan has been prepared to implement measures that seek to improve delivery within Waverley Borough Council. The actions identified are considered to be proportionate and will contribute towards speeding up housing delivery in the Borough.

Appendix 1 – Relevant Paragraphs from the National Planning Practice Guidance (NPPG)

“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.” (Paragraph 047 ref ID 68-04720190722)

Local planning authorities, in collaboration with key stakeholders, are expected to produce the action plan. This will apply for each year of under-delivery where the Housing Delivery Test score is below 95%.

Apart from where an action plan is required as a consequence of the Housing Delivery Test, any authority may produce an action plan as a matter of good practice to identify ways to support delivery. 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 decisionmaking functions, the use of an action plan is encouraged where appropriate to help identify any causes of under-delivery and actions to address these. (Paragraph: 048 Reference ID: 68-048-20190722)

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 landowners
- Infrastructure providers (such as utility providers, highways etc) and other public bodies (such as Homes England)
- Upper tier authorities (county councils) in two-tier areas;
- Neighbouring authorities with adjoining or cross-boundary sites.

(paragraph 049 Ref ID 68-049-20190722).

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

- (such as 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 particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable.

(Paragraph: 050 Reference ID: 68-050-20190722)

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 that could increase delivery rates, including public sector land and brownfield land;
- working with developers on the phasing of sites, including whether sites can be subdivided;
- offering more pre-application discussions to ensure issues are addressed early;
- considering the use of Planning Performance Agreements;
- carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites;
- revising site allocation policies in the development plan, where they may act 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; and
- encouraging the development of small and medium-sized sites.

Paragraph: 051 Reference ID: 68-051-20190722

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. (Paragraph: 053 Reference ID: 68-053-20190722)

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. (Paragraph: 054 Reference ID: 68-054-20190722).