

# Housing Delivery Action Plan August 2025

Folkestone & Hythe District Council



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# 1. Introduction

1.1 Folkestone & Hythe District Council (FHDC) has prepared this Housing Delivery Action Plan in response to its Housing Delivery Test 2023 measurement (2020/2021 – 2022/2023) as calculated by the Ministry for Housing Communities & Local Government (MHCLG).

1.2 The Housing Delivery Test (HDT) is an annual measurement of housing delivery in each local authority area. Where the HDT indicates that housing delivery in an area is below a specified level, the National Planning Policy Framework (NPPF) sets out a series of actions that authorities must undertake. These actions are:

- the authority should publish an action plan if housing delivery falls below 95%;
- if the housing delivery falls below 85% then, in addition to the action plan, the local authority must add a 20% buffer to the 5-year land supply; and
- the authority should apply the ‘presumption in favour of sustainable development’ if housing delivery falls below 75%.

1.3 For the 2023 measurement, the FHDC test result fell below the 85% threshold with a score of 83% against the housing requirement. Consequently, the council must now prepare and publish a Housing Delivery Action Plan (HDAP) on its analysis of the reasons why the rates of housebuilding within its administrative area have not met the levels identified in the adopted development plan; and set out actions to address these issues, with the aim of boosting the delivery of housing in the future. FHDC will also have to add a 20% buffer to the 5-year land supply.

1.4 Regarding the 5-year land supply, the National Planning Policy Framework (NPPF 2024), Paragraph 78, requires local planning authorities to identify and update, annually, a supply of specific deliverable sites sufficient to provide five years’ worth of housing against the housing requirements identified in the adopted strategic policies (set out in local plans). Where an authority cannot demonstrate a five-year housing land supply, the NPPF (paragraph 11) states that the ‘presumption in favour of sustainable development’ should be applied.

1.5 For the 2023/2024 year, the district could only identify 3.1 years’ worth of housing (this includes the 20% buffer). The authority is, therefore, already subject to the presumption in favour of sustainable development.

1.6 The scope and nature of an action plan is not fully prescribed by national policy or guidance, and it is important that any approach relates to local circumstances and needs.

1.7 The FHDC Housing Delivery Action Plan includes:

- Local policy background;
- Housing Delivery Test Result;
- An overview of the national and local context and housing market;
- An analysis of recent housing delivery and projected future housing supply;
- An assessment of the main barriers and constraints to housing delivery; and
- Potential actions which the council is undertaking to help improve delivery in the future.



1.8 The HDAP is intended to be a practical document aimed at increasing housing delivery which draws on local research, evidence and consultation comments from stakeholders. The actions identified in the Action Plan link to several other key council strategies and documents, in particular the Folkestone & Hythe Corporate Plan; the Core Strategy Review and the Places and Policies Local Plans; and the Housing Asset Management Strategy (2022) and Healthier Housing Strategy (2018-2023).

## 2. The National Picture

2.1 The issue of housebuilding has continued to interest national policymakers, and since the council's previous HDAP was finalised in July 2021 several new studies have been published. These include: the House of Lords Built Environment Committee's report 'Meeting Housing Demand' (January 2022); the House of Commons Library's Research Briefing 'Tackling the under-supply of housing in England' (May 2023); the Competition and Markets Authority's (CMA's) report 'Housebuilding market study' (February 2024); and the Institute of Public Policy Research's (IPPR's) paper 'Strategic Planning for Green Prosperity' (February 2025).

2.2 The Lords Built Environment Committee's report identifies a number of factors constraining housebuilding, including: "skills shortages, lack of available land, resources for local planning authorities, the reduced role of SME housebuilders, inadequate support for social housing provision, and the barriers and delays in the planning system."

2.3 The CMA study specifically highlights the role of the planning system, stating:

*"Overall, our view is that ... the nature and operation of the planning system is exerting a significant downward pressure on the overall number of planning permissions that is being produced across the nations of GB. The number of planning permissions granted over the last 10 years across GB, and particularly in England, has been insufficient to support housebuilding at the level required to meet government targets and widely accepted measures of need."*

2.4 The IPPR study, however, highlights that since 2015 almost twice as many planning permissions have been granted than homes started and, since 2010, over one million homes were granted permission but have not been built:

*"This suggests that the issue is not the planning system, but rather other forces at play. These are likely a combination of rising construction costs and interest rates, alongside the speculative nature of land value in England, which drives up the cost of land that has planning permission."*

2.5 Whatever barriers are identified, studies generally agree that the only period in recent history when housebuilding levels have met the government's current target has been when the public sector played a major housebuilding role. The CMA study, for example, finds that:

*"Recent levels of housebuilding are not unusual in the longer historical context ... the only years when housebuilding in England and Wales approached or exceeded 300,000 homes per year were during period with significant levels of local authority housebuilding."*

2.6 Regarding national planning reforms, the council's 2021 HDAP outlined some of the proposals that were being brought forward by the previous government. The general election of July 2024 and the change of government that followed led to delays in implementing the reforms. However, the new government announced soon after it was elected that it sees planning reform and increasing housebuilding as crucial to the country's economic growth. In a letter to local authority leaders in July 2024 the Deputy Prime Minister wrote:

*"... our work is urgent, and in few areas is that urgency starker than in housing. ... you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system."*

2.7 The new government updated the NPPF in December 2024. The new NPPF removes some flexibilities that were introduced by the previous government a year earlier, and housing targets are given greater weight in decision making.

2.8 In February 2025 the new government finally published a response to the previous government's consultation on planning reforms, which was launched in July 2023. This confirms that the new government will implement many of the previous government's proposals, including:

- Requiring housing developers of larger sites to formally notify local planning authorities before they commence development and to report annually on their actual housing delivery.
- Introducing a set of national metrics that planning authorities must measure, including specific metrics on housing approvals and the five-year housing land supply position.
- Increasing planning applications fees to ensure cost recovery for development management services.
- Publishing a suite of national development management policies to streamline local plan preparation. Draft policies are expected to be published for consultation in summer 2025.
- Requiring local authorities to produce new local plans within a 30-month timetable. Further details are to be published in summer 2025.

2.9 Many of the government's proposals, for example reforming the role of statutory consultees in the planning process, reflect recommendations made in earlier studies, such as in the CMA study. The government is introducing a new system of strategic planning through the Planning and Infrastructure Bill currently before Parliament. The Bill seeks to address constraints to housebuilding caused by environmental issues such as nutrient pollution in waterways, and it also contains legislation to reform the operation of planning committees.

### **3. Local Policy Background**

3.1 The council's new Corporate Plan - 'Our district, our world' – was adopted by the council on 25 June 2025. The plan was subject to public consultation between 25 July and 29 September 2024 and the council received comments from 525 residents and organisations.

3.2 The new Corporate Plan is based on five themes, one of which is 'Building new homes, improving the quality of existing homes and tackling homelessness'. This theme includes commitments to build more council homes to meet the needs of residents and to secure

more affordable homes as part of private-sector developments, with homes that are genuinely affordable for local people. Other commitments are to support new community-led and co-operative housing projects and to identify plots for self-builders, as well as to improve the energy efficiency of council houses to reduce carbon emissions and tenants' energy costs.

3.3 The Core Strategy Review was adopted in March 2022. This sets out the spatial vision, objectives, development strategy and a series of over-arching strategic policies that will guide the scale, location and type of development in the district until 2037.

3.4 The Core Strategy Review provides for a minimum of 738 new homes a year over the period 2019/20 to 2036/37 (18 years) or 13,284 additional homes in total.

3.5 The district's primary mechanism for the delivery of new homes is through the allocation of a new garden settlement at Otterpool Park (up to 5,600 new homes over the plan period) and strategic sites, together with small- to medium-sized site allocations set out in the Places and Policies Local Plan (adopted in 2020).

3.6 As the Core Strategy Review (2022) plans a significant change in the level of housing (primarily through the new garden settlement) compared to the previous 2013 Core Strategy, the overall requirement is phased to reflect the level of housing expected to be delivered across the plan period (known as a 'stepped trajectory'). This set out four phases over the plan period, which are as follows:

- Phase 1 – 2019/20 to 2023/24 (five years) – an average of 622 dwellings a year, or 3,110 dwellings in total;
- Phase 2 – 2024/25 to 2028/29 (five years) – an average of 885 dwellings a year, or 4,425 dwellings in total;
- Phase 3 – 2029/30 to 2033/34 (five years) – an average of 730 dwellings a year, or 3,650 dwellings in total; and
- Phase 4 – 2034/35 to 2036/37 (three years) – an average of 700 dwellings a year, or 2,100 dwellings in total.

3.7 The council's Housing Asset Management Strategy 2022-2027 identifies four objectives for the council's housing stock. These are to:

- Ensure that council homes are safe and well maintained;
- Develop social housing that is fit for purpose, meeting the needs of current and future generations of tenants and their families;
- Improve the energy efficiency of council homes and reduce carbon emissions and fuel bills; and
- Develop skills and support the local economy.

3.8 The council's housing stock comprises 3,397 homes, almost 7 per cent of the total housing in the district. Housing associations account for around 3 per cent of homes, 17 per cent is private rented housing and the remaining 73 per cent are owner occupied. The Housing Asset Management Strategy recognises that Folkestone & Hythe district is an area of high housing demand, with high waiting lists for council homes. Prices for home ownership and renting are out

of reach of many on lower incomes and there is generally high demand for vacant council homes. The council has a New Homes Development Strategy which sets an ambitious target to 1,000 new affordable homes over the period to 2036. This will include affordable homes built at Otterpool Park, acquisitions and section 106 contributions from private housing developments.

## 4. Housing Delivery Test Result

4.1 The district's latest Housing Delivery Test result for the period to 2020 to 2023 is 83%. The result incorporating the 2023/2024 year has not been published.

	2020/2021	2021/2022	2022/2023	Total	%
Housing Requirement	414	622	622	1,658	83%
Housing Delivery	478	454	446	1,378	

**Table 4.1: 2022/2023 Housing Delivery Test Result**

4.2 The Housing Delivery Test is now in its sixth year of publication, and the results for Folkestone & Hythe have been on a downward trend from a strong position in the 2017/18 and 2018/19 years to under delivery for the last four years. Table 4.2 below sets out the results over that period.

2018	2019	2020	2021	2022	2023
139%	127%	91%	97% <sup>1</sup>	87%	83%

**Table 4.2: Past results for Folkestone & Hythe District.**

4.3 It should be noted that the past results are based on different housing requirements which started with 350 dwellings set out in the Core Strategy (2013) and which have risen to 622 dwellings per year in the Core Strategy Review. Homes delivered have remained relatively consistent over the past five years at an average of 440 dwellings per annum. The following sections consider delivery in more detail and why it has not increased to levels expected in the Core Strategy Review.

<sup>1</sup> Following the adoption of the Core Strategy Review in March 2022, the Housing Delivery Test measurement for 2021 was recalculated by the DLUHC using the new housing requirement figures. The DLUHC wrote to the council on 5 May 2022, confirming that the score for the district had increased to 97%, passing the HDT for 2021 with no consequence.

## 5. Analysis of Housing Delivery Position

### Recent Housing Delivery

5.1 The council monitors housebuilding through the collection of data on planning applications and the commencement and/or completion of individual dwellings. These two elements provide the basis for measuring performance against the council's housing requirement as set out in the Core Strategy Review. The data collected on housing approvals and completions feeds into the Authority Monitoring Report (AMR), which is published on an annual basis.

5.2 The monitoring process consists of site visits to existing development sites (i.e. sites with extant planning permissions) and engaging with developers/house builders where necessary to understand potential delivery rates and completion targets. Information is also checked against building control and council tax records to ensure accuracy.

5.3 Table 5.1 below sets out annual housing completions against requirement since the start of the Core Strategy Review (2022) plan period (2019/20). Overall, there have been 2,224 new homes completed over the five-year period, 886 short of the expected requirements.

Year	Number of Completions	Annual Requirement
2019/2020	462	622
2020/2021	489	622 <sup>2</sup>
2021/2022	454	622
2022/2023	454	622
2023/2024	365	622
<b>Total</b>	<b>2,224</b>	<b>3,110</b>

**Table 5.1: Annual completions against requirement.**

5.4 Whilst delivery against the Core Strategy Review (2022) requirement has fallen short, completion rates are generally higher than in the past. The table below sets out completions against the Core Strategy 2013 and the Standard Housing Methodology consulted on in September 2017 and introduced in July 2018.

Year	Number of Completions	Annual Requirement
2006/07	146	350
2007/08	402	350
2008/09	562	350
2009/10	180	350

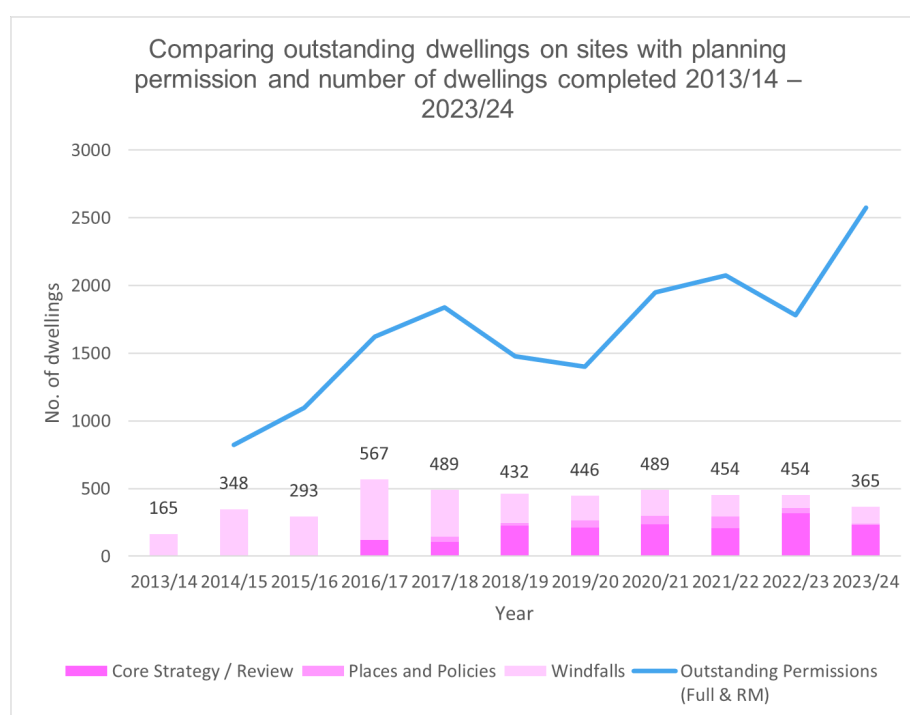
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2 For the HDT, requirement reduced to 414 due to the impact of COVID



Year	Number of Completions	Annual Requirement
2010/11	132	350
2011/12	207	350
2012/13	206	350
2013/14	165	350
2014/15	348	350
2015/16	293	350
2016/17	567	350
Standard Housing Methodology Introduced		
2017/18	489	400
2018/19	432	448
<b>Total</b>	<b>4,129</b>	<b>4,698</b>

**Table 5.2: Historic completions against the housing requirement**



**Figure 5.1: Housing completions vs outstanding commitments 2013/14 – 2023/24**

5.5 Figure 5.1 indicates that there has been an overall increase in full and reserved planning permissions being granted over the years since 2014/15.

5.6 However, the completion rates, whilst generally consistent, are at a much lower number and have not been positively impacted by permissions granted. This mirrors the national picture

highlighted by the IPPR (see paragraph 2.4), whereby local delivery is not directly correlated to planning permissions. In addition, the BBC recently reported that completions in England have fallen by 8% in the year to June 2025 from the previous year, while planning permissions have increased by almost 50% in the first six months of 2025 (excluding London).<sup>3</sup>

5.7 The graph also highlights the number of windfalls that make up the supply. Before the adoption of the Places and Policies Local Plan in 2020, they were relatively high, reflecting the lack of allocated sites. With the adoption of the Places and Policies Local Plan, the number of these have fallen but still provide an important element to the overall housing delivery.

5.8 Table 5.3 below sets out the total number of lapsed dwellings – where the planning permission expired without the development being implemented - as a percentage of the outstanding commitment of all planning permissions in Folkestone & Hythe between since 2019/2020, the start of the Core Strategy Review (2022). Although the rate varied from year to year, overall the lapsed permissions averaged just 1.15% of all homes that had either outline or full planning permission. This suggests that there are very few speculative planning applications made in the district (unlike, for example, major metropolitan areas where planning applications may be made more for valuation purposes than with the intention of constructing the scheme). It also shows that to-date constraints of infrastructure and funding do not appear to be major barriers to starting construction on site, although they may still be factors affecting the rate of build-out after construction has begun.

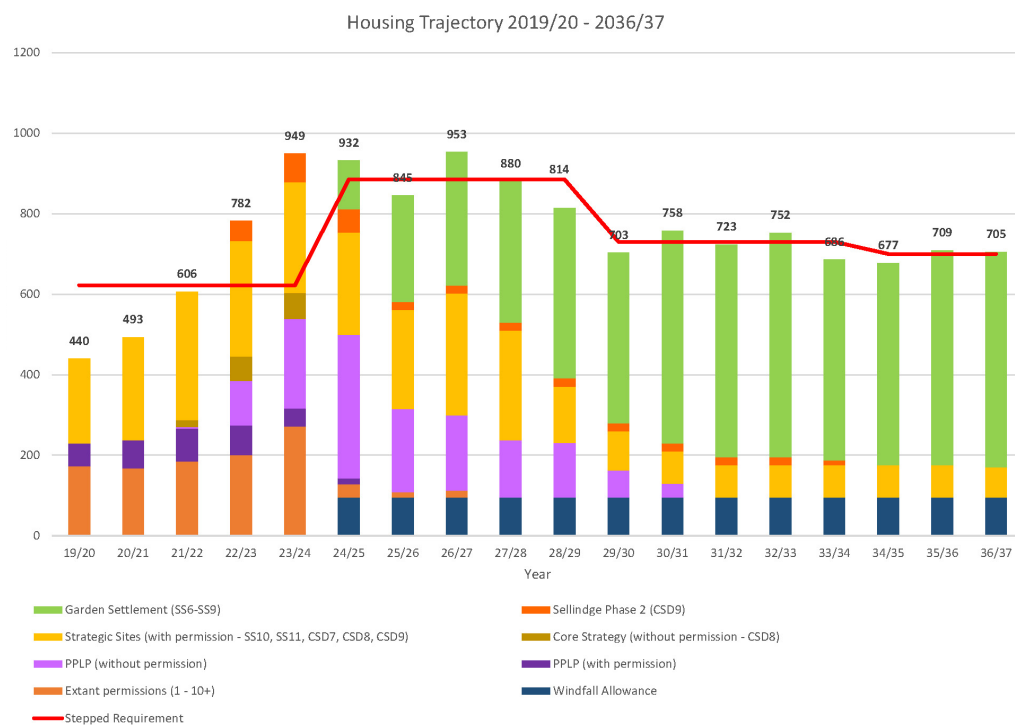
Year	Outstanding Commitment (Net)	Expired Dwellings (Net)	% Expired Dwellings
2019/20	3,239	61	1.89
2020/21	3,048	27	0.89
2021/22	3,277	68	2.08
2022/23	3,522	1	0.03
2023/24	3,220	27	0.84
<b>Average</b>			<b>1.15</b>

**Table 5.3: Percentage of applications expired.**

## Future housing supply

5.9 The Core Strategy Review (CSR) was adopted in 2022. This sets out a housing requirement of a minimum of 13,284 new homes over the plan period (18 years). The housing requirement was to be met through Strategic Allocations (including the garden settlement at Otterpool Park) and broad locations in the CSR, the small to medium allocations in the Places and Policies Local Plan, as well as outstanding planning applications at that time and a ‘windfall assumption’. The trajectory below sets out how new homes were to be phased over the plan period.

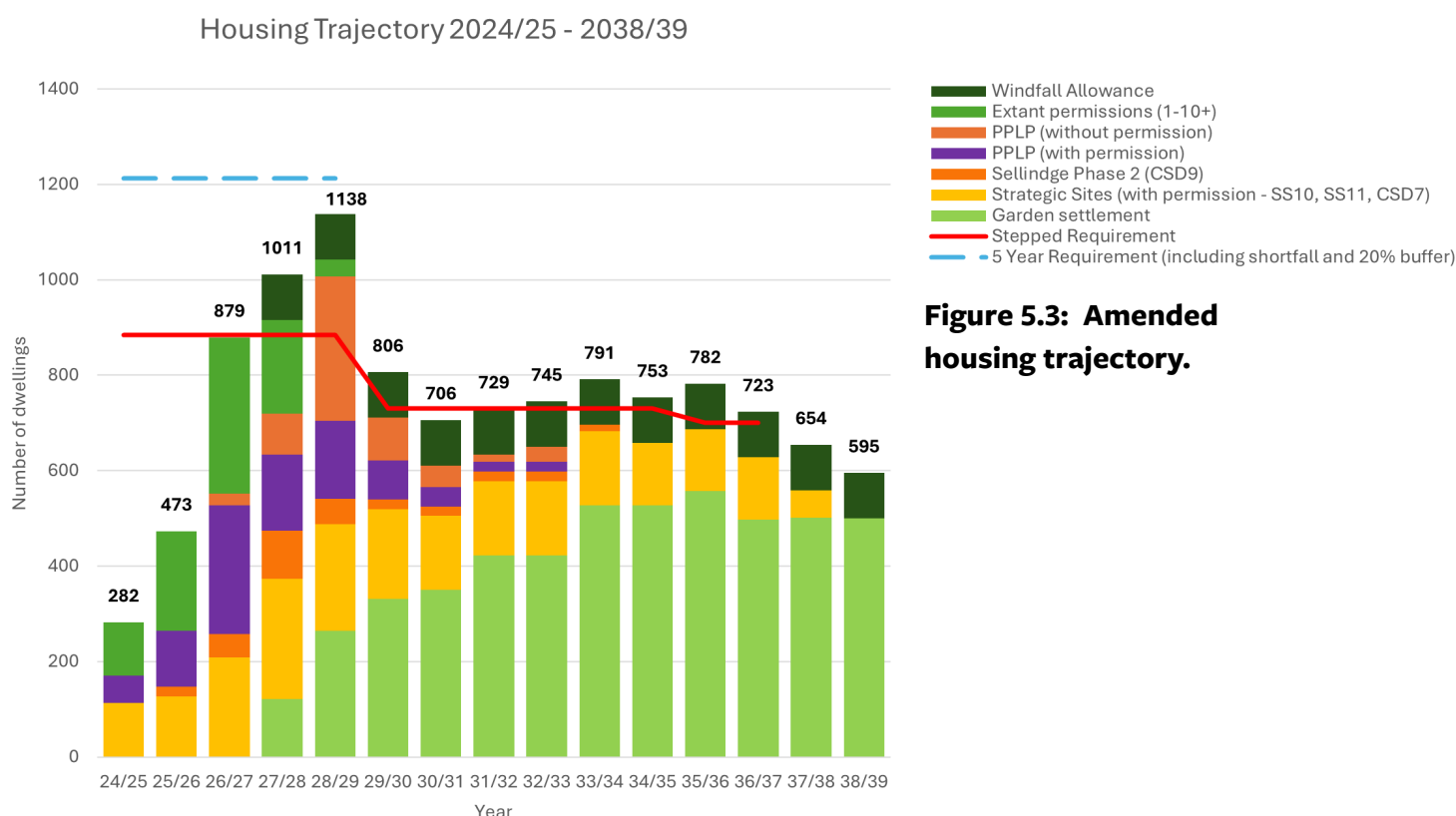
<sup>3</sup> <https://www.bbc.co.uk/news/articles/cr5rmz0vreno>



**Figure 5.2: Core Strategy Review Housing Trajectory.**

5.10 This trajectory clearly sets out how the housing numbers would be met, first initially though the completion of the remaining strategic sites in the Core Strategy (2013), then the allocations in the Places and Policies Local Plan, with the garden settlement at Otterpool Park gradually becoming the focus for development in the district as the plan period progresses. An allowance for windfalls was also assumed.

5.11 The most recent trajectory, based on the 2023/2024 Housing Information Audit, is set out below.



**Figure 5.3: Amended housing trajectory.**

5.12 The graph indicates that delivery has been slower than predicted. For this year, completions are far lower than what was expected in the original trajectory with 282 predicted to be completed rather than 932 which was expected at this date. Completions are also expected to be lower next year (2025/2026). The higher completions appear to be the result of a delay of around three years compared to the previous trajectory, picking up in 2026/27, 2027/28 and 2028/29 and then following the stepped trajectory thereafter.

5.13 Housing completions are predicted to recover in 2026/2027, with a high proportion of extant permissions and allocations expected to be competed. Overall development, including the start of larger sites in the PPLP and the garden settlement, in the Core Strategy Review (2022), being put back by roughly three years.

5.14 However, with the 20% buffer and shortfall added, the overall number of dwellings predicted to come forward is still short of the new requirement.

5.15 The proposed garden settlement is the mechanism that should enable a step change in housing delivery to occur through its ability to deliver multiple types and tenures of housing. The first phases at Otterpool Park will supplement volume market housing elsewhere in the district and will be delivered through local housebuilders, a housing association and the build to rent sector, delivering for certain housing markets currently underprovided for. The garden settlement was allocated in the Core Strategy Review in 2022, following which the council's Planning and Licensing Committee resolved to grant the outline application on the 4th April 2023. An application has been submitted (February 2025) for early infrastructure (wastewater treatment works and primary substation, along with associated wetlands) and is being considered by Kent County Council.

5.16 The other strategic sites are expected to progressively complete their buildouts. A summary of the progress of these sites is as follows.

### **Folkestone Seafront**

Plot B (84 dwellings) of Folkestone Seafront Development has been completed and reserved matters for Plots C1 (110 dwellings), D1 (96 dwellings) and E1 (112 dwellings) have been granted.

### **Shorncliffe Garrison**

Shorncliffe Garrison has progressed with nearly half of the 1,200 dwellings been completed and another 230 under construction. Reserved matters have been approved for a further 222 dwellings. Some delay has been experienced due to the government using part of the site for alternative use.

### **New Romney Broad Location**

Regarding the broad location at New Romney, all but 25 dwellings have been completed (these are currently under construction). In December 2024, a further 91 homes were granted planning permission on land west of Ashford Road<sup>4</sup>.

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4 Land allocated under Policy RM4 in the PPLP, but this would fall outside of the HIA data for 2023/2024.

## Sellindge Broad Location

Policy CSD9 identifies phases A & B. Phase A is located to the southwest of the village, adjacent to new development (identified in the Core Strategy (2013)). Two applications have been submitted and committed resolved to grant these. Phase B has had multiple applications (full and reserved matters) and in total 162 dwellings have been granted with 32 of these being completed at the last survey.

## Martello Lakes (Nickolls Quarry site)

Of the 1,050 dwellings identified in the original outline application, 284 have been completed with another 18 under construction. The site was subject to delays following construction of a new roundabout and the submission of a new application for 650 dwellings, local centre and commercial floorspace (now granted). Reserved matters were also granted for 200 of dwellings in that application.

5.17 The completion of these existing sites, and particularly the strategic allocations, corresponds with the potential transition and commencement of volume housebuilders currently active in Folkestone & Hythe to the development of Otterpool Park.

5.18 Table 5.4 below sets out the predicted HDT results over the next five-year period (based on the 2023/24 HIA). The housing requirement reflects the stepped trajectory in the Core Strategy Review, which increases from 622 dwellings to 885 in 2024. Given the current predicted completions, it is likely that the HDT results will fall before increasing again.

Year	Housing Requirement	Predicted Completions	HDT Predicted Result
2023/2024	1,866	1,273	68.2%
2024/2025	2,129	1,101	51.7%
2025/2026	2,362	1,120	47.4%
2026/2027	2,655	1,634	61.5%
2027/2028	2,655	2,363	89%

**Table 5.4: Estimated Future HDT Results 2023/2024 – 2027/2028**

## 6. Folkestone & Hythe Housing Market

6.1 The housing market is sensitive to market forces and as such, it is accepted that the rate of housing delivery in the Folkestone & Hythe District will fluctuate across various economic cycles, despite the council providing a robust, sound and positively prepared policy framework to help shape and facilitate housing delivery.

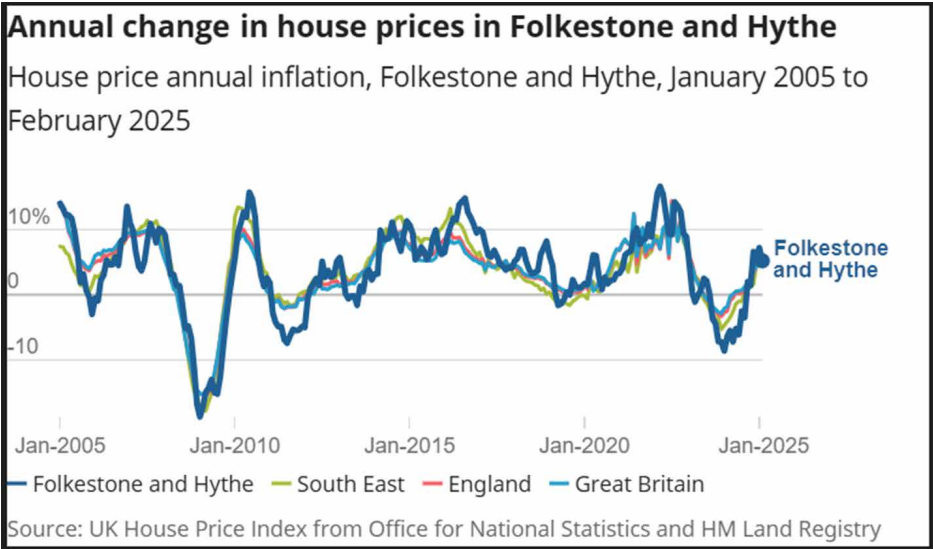
6.2 The PPG advises that house prices should be monitored to identify if longer term changes indicate an imbalance between the demand for, and the supply of, housing.

6.3 Data from the ONS indicates that provisional average house price in Folkestone & Hythe



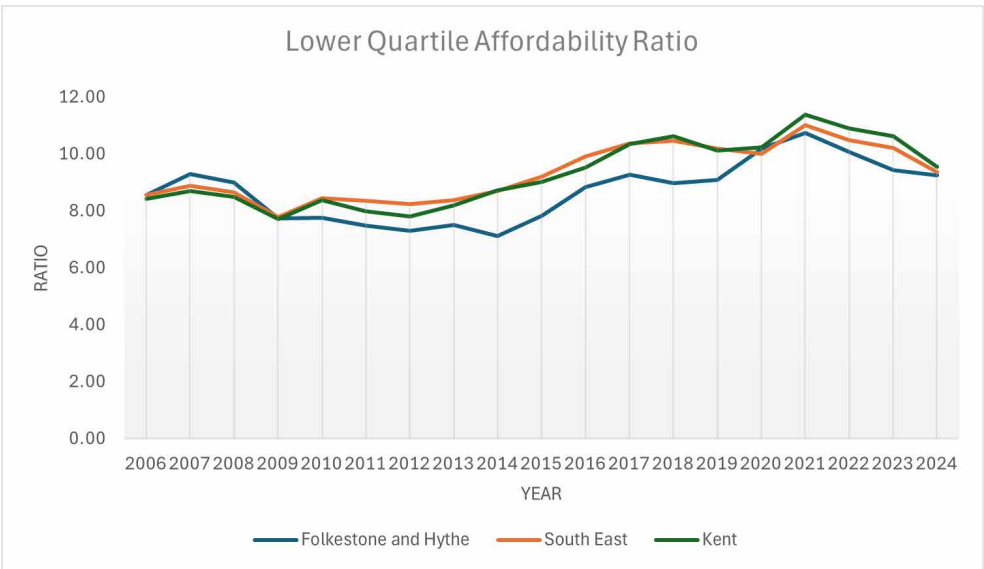
in February 2025 was £307,000. This was higher than the average of £291,000 in February 2024 (revised), a 5.2% rise.

6.4 The ONS indicates that across the South East, the average house price in February 2025 was £385,000, which was higher than a year earlier (£368,000), whilst across Great Britain, a home sold for an average of £271,000 in February 2025, which was up from the February 2024 average of £257,000.



**Figure 6.1: Annual Change in house prices in Folkestone & Hythe District**

6.5 The graph below sets out the ratio of lower-quartile (entry level) house prices to lower-quartile workplace-based earnings (affordability ratio) published by the ONS<sup>5</sup>. This indicates that, house prices in Folkestone & Hythe district are currently slightly more affordable than the Kent or the south east averages.



**Figure 6.2: Lower Quartile Affordability Ratio**

<sup>5</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

6.6 Prior to the financial crash in 2008, the lower-quartile (entry level) house prices were approximately 9.3 times the earnings of households in the district, compared to an approximate ratio of 8.89 in the South East and in Kent 8.71. Affordability in the district improved slightly during the downturn with house prices fluctuating around 7 to 8 times that of household earnings.

6.7 Since 2015 household earnings have not kept pace with rising house prices meaning a return to pre-recession levels of affordability. In 2020, Lower Quartile Affordability Ratio reached 10.19, slightly more than the South East (10.02) and comparable to Kent's (10.24). Within the last four years, the ratios for the district, Kent and the South East have, however, dropped and are similar at 9.25, 9.55 and 9.38 respectively.

6.8 The potential impacts arising from high housing costs and a lack of affordability include falling home ownership, increasing numbers of households renting privately, levels of over-occupied households and those in shared housing increasing. The SHMA (2017) recommends an additional 139 affordable houses need to be delivered each year to meet the needs of households in the district currently residing in unsuitable housing.

6.9 The rising household numbers, coupled with an ageing population, mean that Folkestone & Hythe will continue to need to provide a mix of housing types and sizes, including specialist forms of housing. This presents a challenge for the district as it will need to facilitate the delivery of affordable housing and a range of housing types to meet identified needs, including those of older people and self- and custom-builders, within both the market and affordable sectors.

## **7. Main barriers and constraints to housing delivery**

### **Introduction**

7.1 This section outlines some of the barriers and constraints that may be restricting housing delivery. As noted by the Lords Built Environment Committee, levels of building are influenced by a range of national and local factors (paragraph 2.2).

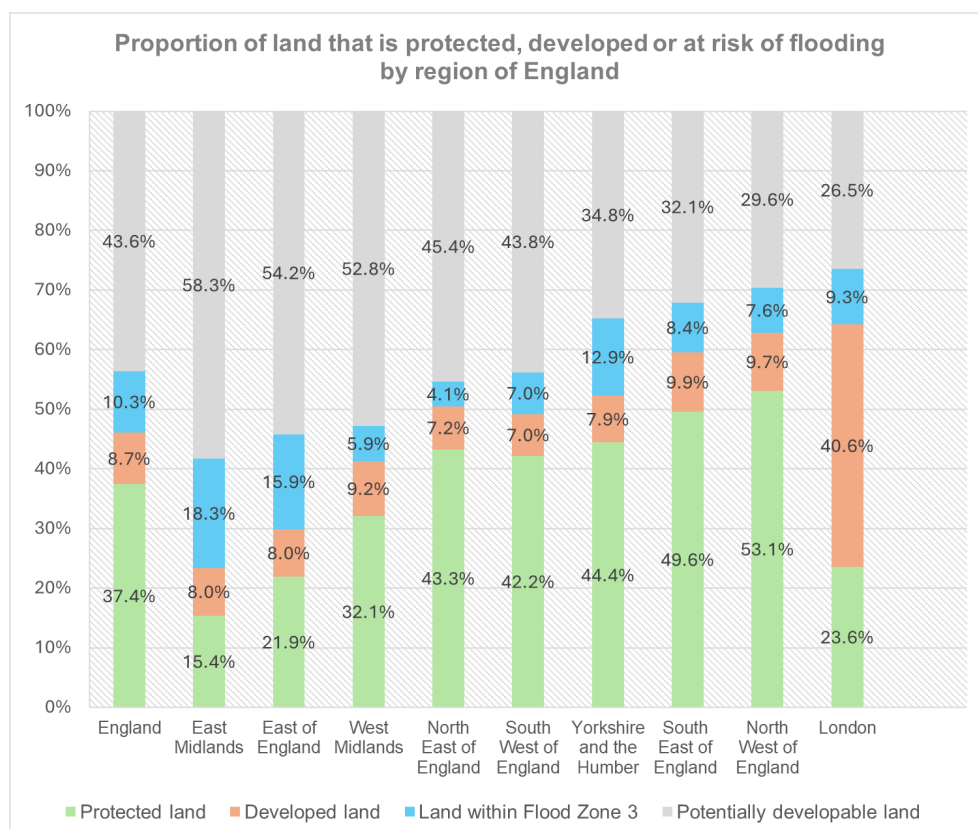
7.2 Clearly some constraints are beyond the ability of Folkestone & Hythe to influence. Key factors affecting housebuilding within Folkestone & Hythe are the environmental constraints that restrict development in the district, including the Kent Downs National Landscape and its setting, areas of high flood risk and international, national and local nature designations.

7.3 The CMA study recognises that “natural constraints such as the quantum of developable land in places where people want to live” affect the quantity of housing supplied to the market.

7.4 The CMA study attempts to estimate how much land could potentially be available for housebuilding in England and its regions by using national datasets to quantify the area of land that is already built on, the area of land that is protected from development by Green Belt, ecological or landscape designations and the area of land that is at high risk of flooding. The remainder is assumed to be potentially developable, although the study recognises that some constraints may overlap, meaning that the exercise may underestimate the amount of developable land.

7.5 Using this methodology, the CMA study finds that approximately 43.6 per cent of land in England is potentially developable. The amount of developable land varies considerably across the

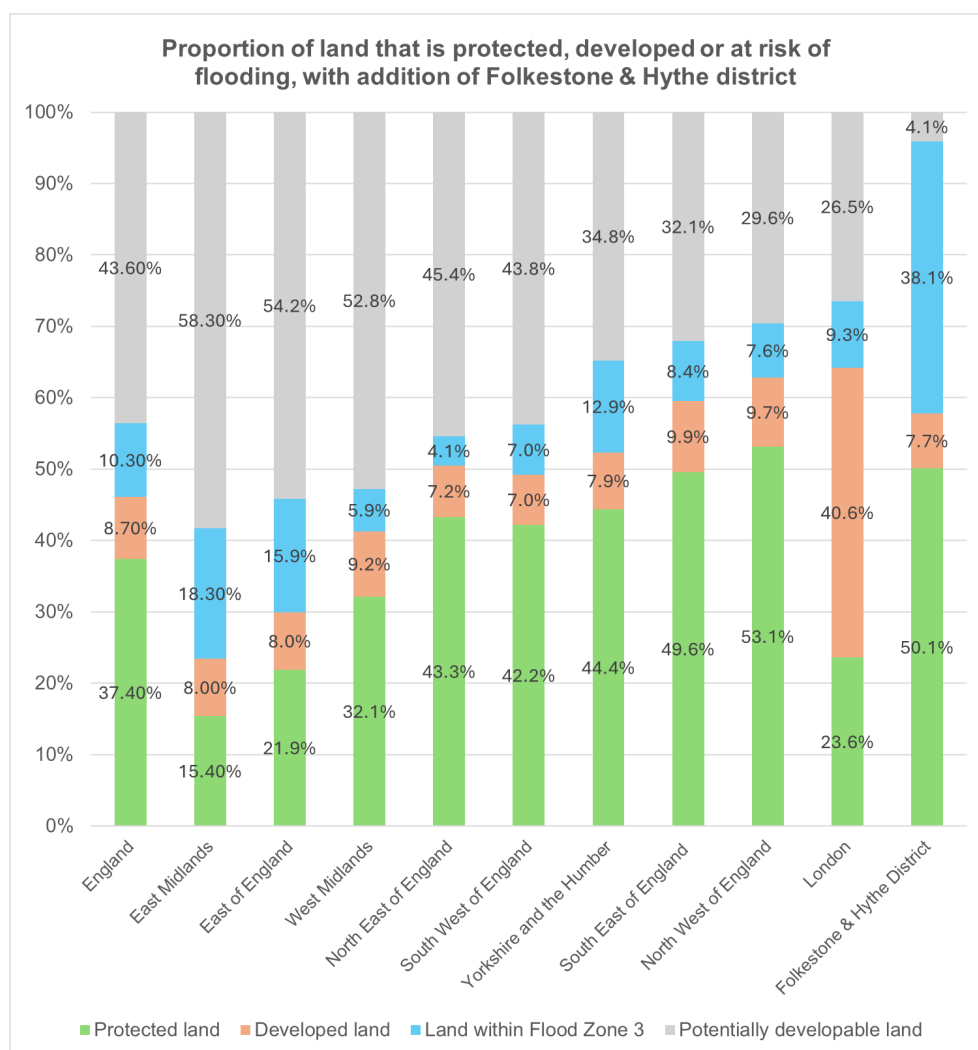
regions, with the southeast of England being one of the most constrained areas of the country, behind only the northwest and London (see Figure 7.1 below).



**Figure 7.1: Proportion of land that is protected, developed or at risk of flooding by region in England (adapted from CMA, 2024, Figure 4.4, page 67)**

7.6 Folkestone & Hythe district sits within the southeast region, one of the most constrained in England. While accepting the limitations of the CMA’s methodology, particularly the double counting of constraints where they may overlap, if the same approach is used for Folkestone & Hythe district, totalling built up and constrained land from national data sets, this suggests that Folkestone & Hythe is significantly more constrained than England and the south east. Figure 7.2 below shows Folkestone & Hythe district in the context of the English regions.

7.7 The CMA’s methodology would suggest that only around 4.1 per cent of Folkestone & Hythe is potentially developable. Of that land more than half, some 765 hectares, is allocated for development as part of the Otterpool Park garden settlement. This suggests that as little as 2 per cent of the district’s land may be potentially available and unallocated for development. While the CMA’s methodology provides a very crude estimate of potential land availability, it does serve to illustrate the severe environmental constraints affecting the district; these constraints will be examined closely during the preparation of the council’s new local plan.



**Figure 7.2 Proportion of land that is protected, developed or at risk of flooding by region in England & Folkestone & Hythe District.**

7.8 The north of the district also falls within the Stour Valley and Stodmarsh National Nature Reserve catchment area. New development in the catchment area has the potential to increase nutrient flows into the River Stour, flowing into the Stodmarsh system of European designated sites (Special Area of Conservation, Special Protection Area and Ramsar site), in north east of Canterbury. Damage to the water quality of these sites (eutrophication) has been caused by high nutrient levels, particularly phosphorus but also nitrogen. In 2020, Natural England advised that any new housing in the area must not result in additional nutrients (nitrogen or phosphorus) entering the River Stour catchment to ensure no adverse impact on Stodmarsh. Kent County Council<sup>6</sup> has reported that, as a result, new housing delivery in East Kent has been held up whilst suitable mitigation is established.

## Stakeholder Survey on Barriers to Delivery

7.9 To help inform the Housing Delivery Action Plan, the council consulted land and planning agents, developers and landowners, all of which have come into contact with the Planning

<sup>6</sup> Stodmarsh Nutrient Mitigation Strategy

Department, to gain a fuller understanding of the issues that may be constraining delivery of new housing in the district.

7.10 42 questionnaires were sent out and the respondents were asked to consider the relative importance of a range of specific factors (e.g. lack of sites, development viability issues, delays in the planning process etc) in constraining or slowing down housing delivery. A copy of the questionnaire is attached in Appendix 1.

7.11 Nine responses were received (21%) from individuals consisting of four planning consultants, three architects and a site promoter<sup>7</sup>. Not all questions were answered by the individuals, and it was clear from the responses, that they were largely influenced by specific cases. 79% of those surveyed chose not to respond. Given the low number of responses the results are unlikely to be representative of all developers and promoters operating in the district, particularly when considering the number of people that did not feel the need to respond. However, the responses that were received are considered in the following paragraphs.

## **Housing Market**

7.12 Regarding the housing market, all but one of those responding considered that the housing market in the district has capacity to expand if enough suitable sites were available. It was suggested that the market could take between 600 and 850 dwellings each year given the right conditions. However, this will be dependent on identifying sufficient suitable sites and as noted above the district is highly constrained. Furthermore, evidence also indicates that permissions approved have not been built out.

## **Affordable Housing**

7.13 Five respondents indicated that finding a partner for affordable housing was an issue slowing down development of sites. Six responded positively when asked whether developers would be interested in joint working with the council on affordable housing schemes using council-owned land.

## **Development Plan & Site Availability**

7.14 Regarding the Development Plan the main issue raised was the lack of small- to medium-sized sites in the district or policies to encourage them to come forward. Three respondents also indicated that there is a lack of strategic sites in the Local Plan.

7.15 Respondents also raised the issue of the lack of an edge of settlement policy to guide development (similar to SP4, which was recently adopted in Dover, or HOu5 in Ashford's local plan). Other comments made included restrictive in-fill policy resulting in limited sites for self-build and overly harsh constraints on development within the National Landscape or on the edge of settlements.

7.16 Other issues raised included delays in updating the Places and Policies Local Plan (adopted in 2020) and that the council should carry out a call for sites to identify other possible development sites.

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<sup>7</sup> One did not respond to the question.



## **Speed of decision making**

7.17 Six responses indicated that delays in determining planning applications was affecting housing delivery. Comments were also made in relation to the planning committee and their understanding of planning legislation as well as overturning officer recommendations. Other reasons given for slow delivery related to the time taken in finalising legal agreements and the discharging of conditions.

7.18 One response also raised the lack of guidance relating to Biodiversity Net Gain and another suggested that the quality of interaction had dropped since officers largely worked from home.

7.19 Suggestions to improve the decision-making process included the prioritisation of Planning Performance Agreements (PPAs) (including post committee and established timeframes with legal); proactively engaging with landowners on sites permitted but not yet started; and reviewing the Community Infrastructure Levy (CIL), pre-commencement orders and discharging conditions. Improving communication with developers and setting up a developers' delivery forum to tackle delivery issues were also highlighted.

## **Viability**

7.20 Six responses raised issues with viability. It was suggested that the combined cost of CIL and s106 reduced the viability of schemes in certain parts of the district. The decision to remove education contributions from CIL and the additional costs for Nutrient Neutrality have been added to these costs to the developer.

7.21 One respondent commented that the decision taken to remove education out of CIL without any testing of the implications or the uncertain costs of Nutrient Neutrality have also affected viability of sites

## **Other issues and suggestions raised**

7.22 Three of those who responded raised the issue of a shortage of skilled labour slowing down development.

7.23 To help improve delivery, other actions identified included the council helping to stimulate greater diversity of housing product (such as social housing) or proactively responding to bidding for funding opportunities as they arise to support the delivery of new infrastructure. It was also suggested that the brownfield register should be reviewed and updated to grant permission in principle.

## **Summary**

7.24 Overall, five themes have come through the consultation:

- It is considered that there is capacity in the local market to deliver at a higher rate with the right sites;
- Issues with viability and rising costs of CIL, S106, nutrient neutrality and biodiversity net gain;
- The lack of affordable housing partners is a problem, but respondents would be happy to work with the district council;

- The process to make decisions on planning applications is perceived to be slow and needs to be improved, this includes validation, committees, discharging conditions and legal decisions as well as working practices; and
- There is a lack of small to medium sites and this is compounded by a lack of a small sites policy in the development plan (therefore the local plan needs to be reviewed).

7.25 It is important to reiterate that those responding may have had specific issues with the planning service and may not be representative of overall developer satisfaction with the service the council provides. The most recent performance results for the past financial year have indicated that the council's results are in the upper quartile for England and have consistently improved. The council's analysis of open data suggests:

- 84% of all decisions are made in statutory time which means that the council was in the top 2% in England (of 314), 2nd in the South East and the best in Kent.
- In terms of major applications 20% of decisions were made within 13 weeks. The council improved from 10% to 20%, from 174th in England to 106th, from 11th in Kent to joint 6th.
- In terms of minor applications, which includes housing applications for between 1 and 9 homes, the performance figures indicate that the council was 11th in England and 2nd in Kent
- The council's validation process runs at less than five days, which meets the government's targets.

7.26 From the Development Management team's perspective, delays in the processing of applications have been due to:

- Alterations to the heads of terms by applicants after the committee decision has been made;
- Developers seeking multiple discharge of conditions under one application; and
- Delays in signing agreements due to the time taken by external third-party signatories.

7.27 The experience in the team regarding delays in building new homes has been down to lack of funding for the project or, in one case, government bodies using the site for alternative uses. Nutrient neutrality issues do not seem to be major issue, as experienced in neighbouring authorities, and has only impacted sites around Sellindge and these were resolved.

## **8. Key Actions and Responses**

8.1 The National Planning Practice Guidance sets out several actions and initiatives that local authorities could put in place to increase housing supply. Key actions are set out in detail below. This is followed by other actions that the council will examine.

### **National Planning Practice Guidance (NPPG) Suggested Actions.**

8.2 Paragraph 43<sup>8</sup> of the NPPG sets out the actions that local planning authorities could consider as part of the Action Plan. These are listed below together with the council's response to each and a timescale when they are likely to be carried out.

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8 NPPG, Paragraph: 043 Reference ID: 68-051-20190722, Revision date: 22 07 2019

NPPG Suggested Action	F&HDC Position	Timescale Short (1-2) Medium (3-5) Long (6+)
Revisiting the Strategic Housing Land Availability Assessment (SHLAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land.	The council is currently undertaking a new Housing and Economic Land Availability Assessment (HELAA). Two 'call for sites' have been carried out, the first in November 2024 and the second in March 2025. Sites are currently being assessed and will be presented in the HELAA.	Short Term
Working with developers on the phasing of sites, including whether sites can be subdivided.	This is currently being undertaken by officers as part of the annual Housing Information Audit (HIA). Developers are asked to share up-to-date information on the phasing of sites.	Implemented
Offering pre-application discussions to ensure issues are addressed early.	The council's Development Management Team already offers pre-application advice on housing and other proposals. Usage of the service is good.	Implemented
Considering the use of Planning Performance Agreements.	The council's Development Management Team already use Planning Performance Agreements.	Implemented
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites.	Two 'call for sites' were carried out in November 2024 and March 2025. Sites are currently being assessed and will be presented in the HELAA (see above). The council is planning to undertake this annually.	Implemented

NPPG Suggested Action	F&HDC Position	Timescale Short (1-2) Medium (3-5) Long (6+)
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.	Will be addressed through the local plan process and will be re-evaluated through a future review, especially where small / medium sized sites need to meet the same policy requirements as large sites, while struggling with smaller site areas and development quanta and being unable to benefit from economies of scale. The council has published a 'Local Plan Timetable' and, subject to the publication of new Regulations by government, work on the next local plan will commence in November 2025.	Medium Term
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use.	None in operation in Folkestone & Hythe district.	N/A
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.	This is currently being undertaken by officers as part of the annual Housing Information Audit (HIA). Developers are asked to share up-to-date information on the phasing of sites. As set out in paragraph 2.8 above, developers of larger sites will be required to update the council annually with progress on the build out of their sites.	Implemented
Establishing whether certain applications can be prioritised, conditions simplified, or their discharge phased on approved sites, and standardised conditions reviewed.	The standard conditions list has been revised.  The council is encouraging developers not to seek the discharge multiple conditions under one application as this slows the overall process.	Implemented and short term.

NPPG Suggested Action	F&HDC Position	Timescale Short (1-2) Medium (3-5) Long (6+)
Ensuring evidence on a particular site is informed by an understanding of viability.	This will be undertaken through the plan-making process. This is currently being carried out, where appropriate through the planning application process. The council retains consultants to advise of viability assessment in connection with planning applications.	Implemented for planning applications stage. Medium Term for local plan.
Considering compulsory purchase powers to unlock suitable housing sites.	Consider when changes proposed in the Planning & Infrastructure Bill are in place.	Long Term
Using Brownfield Registers to grant permission in principle to previously developed land.	A review of the brownfield register to be undertaken by officers. Unable to apply permission in principle where development proposals considered to be 'Habitats Development' without an appropriate assessment, due to the presence of SPA, SAC and Ramsar designations.	Short Term
Encouraging the development of small- and medium-sized sites.	<p>The Places and Policies Local Plan currently allocates a range of small- and medium-sized sites. Historically, the council also has a positive track record of receiving and approving development on windfalls sites. This is monitored annually through the HIA to ensure that the windfall allowance is achieved. A new policy on small sites may be introduced through the government's National Development Management Policies. If there is no national policy, the council will consider introducing a policy through the new local plan.</p> <p>The council, however, already takes a pragmatic view of sites not allocated outside the settlement boundary.</p>	Implemented

**Table 8.1: National Planning Practice Guidance (NPPG) Suggested Actions.**

8.3 In addition to the above, the council has also taken the following actions to increase the delivery of homes:



- The council has acquired and is actively promoting strategic land for a new garden settlement at Otterpool Park as an allocation in Core Strategy Review and has established a Limited Liability Partnership (LLP) as the delivery vehicle to bring forward the site. The council has resolved to grant outline planning permission and is also working with the applicant to resolve the barriers.
- The Strategic Flood Risk Assessment (SFRA) has been reviewed, and a Level 2 report will be produced to test sites that have come forward as part of the HELAA.
- Other evidence currently being produced for the new local plan will include:
  - Review of the Growth Options Study to take account of the updated SFRA and/or preparing a more focused approach to smaller areas for growth.
  - Update the Employment Land Review which could identify redundant employment land with the potential for housing development.
- Regular review of the Infrastructure Delivery Plan (IDP) and exploring opportunities for funding applications for new infrastructure schemes. Council officers are involved in various grant funding applications to support the delivery of new infrastructure.
- An in-depth review of the current resourcing and capacity of the Development Management Team was undertaken in 2020/21. Two Area Teams within the Development Management team have been created, and additional resources were added to the Strategic Sites Team. The planning service has been re-structured and is now fully resourced. As highlighted in section 7 above, performance figures have improved and are better than most in the county.
- Review of the pre-application process to encourage the uptake of the advice service to reduce abortive work by developers in bringing forward schemes. Reviewing pre-application processes (including the charging schedule and validation check sheet) and introducing secondary sign off by Team Leaders for housing pre-application advice.
- The council's planning department actively encourages the uptake of voluntary Planning Performance Agreements (PPAs) to assist in the delivery of major applications for housing sites within the local plan.
- Development Management Team hold quarterly meetings with agents and developers and are planning to hold additional meetings with larger housebuilders not currently operating in the district. A separate developers forum is being formulated.
- The changes to the council's planning processes have resulted in improvements in the national targets for all types of applications over the last financial year.
- Additional training for Planning Committee Members has been undertaken.
- Council officers have been working with funding providers, such as Homes England, to secure finance to deliver housing by enabling sites with marginal viability to be developed (such as Biggins Wood and Ship Street in Folkestone).
- Delivering market and affordable housing through the council's development arm and developing surplus council-owned land to provide new social housing. Current projects that will provide 100 new affordable homes include:
  - Middlesex House, Arras Way, Folkestone (completed)
  - Risborough Barracks, Cheriton (February 2026)

- Sutherland Park, Hythe (March 2026)
- Broad Street, Lyminge (March 2026)
- Westwell Park, New Romney (February 2027)
- The council has implemented a marketing and branding campaign to improve the perception of the district and encourage inward investment including housing. The council also manages Folkestone Works to promote inward investment.
- Council officers attend Kent Chief Planners, Kent Development Managers, and Kent Planning Policy Forums to share delivery trends and intelligence.
- The council is active in bringing forward suitable sites (e.g. through the Place Plan for Folkestone Town Centre and by taking positive decisions on suitable sites on the edge of settlements where appropriate) to guide the redevelopment of opportunity sites. The Place Plan, which was agreed in September 2021, identifies short-term, medium-term and long-term opportunity sites which the council will examine through its call for sites and new local plan.
- The HIA process was refined to provide clarity on stalled sites, by introducing specific stages in the 'under construction' category to monitor progress more closely. This will inform how long particular sites take to deliver completions and likely build out rates. New requirements for developers of larger sites to formally notify local planning authorities before they commence development and to report annually on their actual housing delivery should improve the information available to the council in the future (see paragraph 2.8 above).

## Summary and Proposed Actions

8.4 The 2023 measurement for the Housing Delivery Test, published by government, indicated that the FHDC result fell below the 85% threshold with a score of 83% against the housing requirement.

8.5 The primary reasons identified that could have caused this situation are:

- Development in the district is very restricted by national constraints, primarily Flood Risk, National Landscape and international and national nature conservation designations. As noted above (see paragraphs 7.3 – 7.7) the Competition and Markets Authority (CMA) produced a basic methodology to illustrate how much land could potentially be available for housebuilding in England. Accepting that this only provides a very crude estimate, the CMA's methodology suggests that around 4.1 per cent of Folkestone & Hythe is potentially developable. Of that land more than half, some 765 hectares, is allocated for development as part of the Otterpool Park garden settlement. This suggests that as little as 2 per cent of the district's land may be potentially available and unallocated for development. This shows the severe environmental constraints affecting the district. Development proposals that do fall within the designated areas are subject to more restrictive policies and additional work which slows the decision-making processes down.
- Reliance on strategic sites coming forward in the development plan.
- Lack of policy and allocations for small to medium sites.
- Lack of affordable housing partners stalling permissions.
- Decisions made by Planning Committee against Officer advice.

- Some development management process, such as third-party signatures, slowing the discharge of planning agreements.

8.6 As set out earlier in section 8 above, the district council is already undertaking many of the actions advised by government to boost the future delivery of housing in the district.

8.7 The district council has also been proactive in working with developers, taking on affordable housing schemes, and working with other agencies, such as Homes England, on difficult projects.

8.8 Whilst the district council will continue to do these, the actions that the council consider to be priority to boost the delivery of homes are:

### **In progress**

- Updating the Housing and Employment Land Availability Assessment. This work has started with two ‘call for sites’ having already been undertaken. Further calls will be made on an annual basis, or more frequently, if required.
- Updating the Brownfield Land Register annually or adding new sites when individual sites are submitted and assessed as suitable.
- Providing guidance on Biodiversity Net Gain so that it is clear for developers and their agents.
- Monitoring planning application processes to ensure decisions continue to meet national targets and review practices, such as the need for third party signatories on planning agreements.

### **Short Term 1-2 years**

- District wide design code. Work has commenced on a design guide in conjunction with other east Kent authorities. Design codes are intended to enable applicants to understand the design requirements to achieve consent, reducing time through the planning system and delivering more homes. For decision making this means confidence in maintaining design quality whilst approving more applications.
- Interim guidance notes. These could be produced to provide guidance on design issues (such as extensions or parking) in the short term when the Design Guide is being drafted.

### **Medium Term 3-5 years**

- New local plan. The council has already committed to undertake a new local plan to replace both the Places and Policies Local Plan (2020) and the Core Strategy Review (2022). Work on the evidence base for this has already started with a Strategic Flood Risk Assessment nearing completion (to identify where development should go in the flood risk areas) and the HELAA mentioned above. Further work will be commissioned. Timescales for the new local plan are dependent on the publication of regulations to the Levelling Up and Regeneration Act by government. This is expected in summer / autumn 2025.

8.9 The council will also look to implement measures in the government’s “Planning Reform Working Paper: Speeding up build out” if they are taken forward. This proposes reforms to the

planning system, including changes to planning committees and statutory consultees. It also proposes “Delayed Homes Penalty” for development which falls materially behind pre-agreed build out schedules, as set out through the new transparency measures.

8.10 There are, however, issues that the district council cannot change, that of the international and national designations that constrain the district and add additional considerations when submitting applications. The lack of skilled labour and the current financial situation for funding schemes are also outside of the remit of the council.

## **9. Monitoring and Review**

9.1 The Housing Delivery Action Plan will be carefully monitored to assess its impact on the completion of new homes in the district. As a first step, the actions that are already in place or are identified for the short-term in Section 8 will be monitored. This will allow the council to better understand any root causes of under-delivery. If required (depending on the outcome of a future Housing Delivery Test), another Action Plan will be produced next year which will review the actions and successes from this Action Plan, as well as highlighting if further actions (including new actions) are needed. Following this, the council can move on to the medium-term and long-term actions.

## Appendix 1: Developer Questionnaire

### 1. What best describes you?

- National Housebuilder ☐
- SME ☐
- Registered Provider ☐
- Planning Agent / Consultant ☐
- Architect ☐
- Site Promoter ☐
- Self / custom builder ☐

### 2. Which would you consider best describes your current involvement with promoting housing development in Folkestone & Hythe District? (Please tick all those that apply)

- Active (i.e. have housing sites in the planning process) ☐
- Dormant (i.e. have potential housing sites; or seeking investment opportunities) ☐
- Inactive (i.e. have no potential housing sites; and not seeking investment opportunities) ☐

### 3. If you are a housing developer (i.e. housebuilder, SME; and RP), what is your current typical build out rate per annum in Folkestone & Hythe District?

- 0 dwellings ☐
- 1-25 dwellings ☐
- 26-50 dwellings ☐
- 51-100 dwellings ☐
- 100+ Dwellings ☐
- N/A ☐

### 4. On average, Folkestone & Hythe District Council is delivering approximately 450 homes per annum. Do you think that there is a capacity in the local market to deliver at a higher rate, if enough suitable sites were available?

- Yes (F&HDC housing market expanding) ☐
- No (F&HDC housing market saturated) ☐

If yes, how many homes do you think you could deliver per annum in Folkestone & Hythe District?

.....

### 5. Which of the following issues affect housing (Please tick all those that apply).

- A lack of suitable and available strategic housing sites (i.e. 250+)
- A lack of suitable and available small and medium housing sites (i.e. 1 - 249)
- Land banking
- Challenges associated with land assembly (i.e. legal, ownership, land prices) ☐

- Spatial constraints restricting development opportunities (i.e. AONB, Flood Risk, Sites of Biological Interest (SSSI, RAMSAR, SPA etc)). ☐
- Finding partner for taking on/providing Affordable Homes. ☐
- Other (Please State) ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

**6. Which of the following aspects of the planning process do you think have affected housing delivery? (please tick all that apply)**

- Existing development plan policies too prescriptive; ☐
- Existing development plan policies too ambiguous; ☐
- Lack of a small sites policy ☐
- A lack of up-to-date supplementary planning policy guidance ☐
- Pre-application advice (i.e. cost, time taken, consistency) ☐
- Planning application validation ☐
- Finding a partner for taking on/providing affordable homes ☐
- The time taken to determine a planning application (i.e. validation to decision notice) ☐
- Finalisation of associated legal agreements (i.e. time & viability) ☐
- Use of pre-commencement conditions ☐
- Discharge of planning conditions (i.e. time taken) ☐
- Planning Committee (i.e. consistency, standard of debate, overturn officer recommendations) ☐
- Consultee delays (Highways, Ecology, Environment Agency, Town/Parish Council etc) ☐
- Appeals (i.e. quality of decision making – planning officer and/or planning committee) ☐
- Other (please state) ..... ☐
- None ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

**7. Which of the following issues concerning housing delivery do you think have affected housing delivery? (Please tick all that apply)**

- Economic and housing market uncertainty i.e. demand for housing / competition ☐
- Viability i.e. planning obligations - affordable housing, CIL and S.106 ☐
- Difficulties accessing finance ☐
- Significant infrastructure requirements i.e. utilities, highways, waste water ☐
- Site preparation i.e. contamination, land stability ☐
- Shortages in skilled labour (i.e. tackling shortages in the construction industry) ☐
- Shortages in materials ☐
- Other (please state) ..... ☐



- None ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

**8. Do you have a site (in planning process or not) where the barriers listed above apply to the delivery of your site?**

- Yes ☐
- No ☐
- If yes, please specify ☐

**9. Which of the following actions could increase housing supply?**

- Review development plan ☐
- Undertake a regular review of the effectiveness of current housing policy ☐
- Update the council's land register of available housing sites (i.e. 'call for sites') ☐
- Increase promotion for new housing through council led initiatives and regeneration strategies (i.e. town centre regeneration plan) ☐
- Introduce a 'small sites' policy for edge of settlement proposals of exceptional design ☐
- Increase and improve current monitoring of housing data to be more reactive to emerging issues. ☐
- Pro-actively engage with landowners/site owners where applications have been granted for a time, and not yet commenced. ☐
- Other (please state) ..... ☐
- None ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

**10 Which of the following planning process actions could increase housing supply?**

- Review Community Infrastructure Levy (CIL) ☐
- Update or prepare new supplementary planning guidance to provide greater certainty to developers on matters such as parking, drainage; and broadband ☐
- Encourage use of pre-application services and Planning Performance ☐
- Agreements ☐
- Review internal planning resource and processes (i.e. validation to decision) ☐
- Review the process for using pre-commencement conditions and discharging planning conditions ☐
- Review the processes for finalising legal agreements ☐
- Review Planning Committee processes ☐
- Prioritise planning application of 10 or more houses ☐
- Other (please state) ..... ☐

- None ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

# 11 Which of the following housing delivery actions could increase supply?

- Council to help stimulate greater diversity of housing product, i.e. council housing / social housing ☐
- A lack of diversity in housing product i.e. council housing, social housing ☐
- Council proactively responding to bid funding opportunities as they arise to support the delivery of new infrastructure ☐
- Council to raise infrastructure delays with relevant providers ☐
- Review and update the brownfield register to grant permission in principle. ☐
- Promote greater links with colleges / vocational courses for housebuilders ☐
- Set up a developers' delivery forum to tackle delivery issues ☐
- Other (please state) ..... ☐
- None ☐

[Please use this box for any additional comments you may wish to make; or to expand on any of issues raised above]

# 12 Would you be interested in joint working with the council on affordable housing schemes, utilising council owned land?

- Yes ☐
- No ☐

[Please use this box for suggestions as to how this could be achieved]:

# 13 Would you be interested in participating in a future developer forum / workshop with the Council?

- Yes ☐
- No ☐

# 14 Do you want the council to send you a copy of the Housing Action Plan when it's published

- Yes ☐
- No ☐

# 15 Would you like to be involved in future surveys regarding housing delivery with Planning Policy?

- Yes ☐
- No ☐





## Housing Delivery Action Plan

Folkestone & Hythe District Council

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