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# Housing Delivery Test Action Plan 2020

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**July 2020**



**Elmbridge**  
Borough Council  
*... bridging the communities ...*



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## **Acronyms**

AIFS – Annual Infrastructure Funding Statement

AMR – Annual Monitoring Report

BLR – Brownfield Land Register

Dph – Density per hectare

EBC – Elmbridge Borough Council

HDT – Housing Delivery Test

HMA – Housing Market Area

HWP – Housing White Paper

ICMDM - Individual Cabinet Member Decision Making

IDP – Infrastructure Delivery Plan

LAA – Land Availability Assessment

NPPF – National Planning Policy Framework

ONS – Office of National Statistics

PPG – Planning Practice Guidance

SHMA – Strategic Housing Market Assessment

SM – Standard Methodology

SSSI – Site of Special Scientific Interest

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# 1. Introduction

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- 1.1 It is widely accepted that we are experiencing a national housing crisis. This lack of supply and pressure for new homes is felt even more acutely in the South East of England. The Government is focused on increasing the supply of new homes across the country. In the 2017 Budget, the Government announced that it would enable the housing market to deliver 300,000 homes a year on average by the mid-2020s<sup>1</sup>. This objective was to increase the number of new homes and is reflected in the new National Planning Policy Framework (published July 2018 and updated February 2019) which included the introduction of the Housing Delivery Test (HDT).
- 1.2 The first HDT (2018) result for Elmbridge Borough Council (EBC) was published by the Secretary of State on 19 February 2019. EBC scored 62% and in response to this, the council produced and published a Housing Delivery Action Plan (the Action Plan) 2019<sup>2</sup>.
- 1.3 The 2019 score was published on 13 February 2020 and EBC scored 58%. To continue the council's commitment to positively responding to the challenge of increasing housing delivery in the borough, the Action Plan 2019 has been reviewed and updated. This Action Plan analyses the reasons for the under delivery of new homes, reflects on the performance of the 2019 Action Plan over the past year and includes new actions to improve housing delivery within the borough.
- 1.4 The HDT Action Plan 2020 was approved by Individual Cabinet Member Decision Making (ICMDM) on 15 July 2020.

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<sup>1</sup> Technical consultation on updates to national planning policy and guidance

<sup>2</sup> As part of the preparation of the Housing Delivery Action Plan, the council participated in the Planning Advisory Service Pilot Study

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## 2. Planning Policy Context

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### **The Housing White Paper**

- 2.1 In response to the national housing crisis, the Government published the Housing White Paper (HWP) [‘Fixing our broken housing market’](#) in February 2017. The HWP set out the Government’s plans to reform the housing market and boost the supply of new homes in England<sup>3</sup>. The proposed measures covered planning for the right homes in the right places, how to build homes faster and how-to diversify the housing market.
- 2.2 Importantly, it proposed to hold local authorities to account for the number of new homes delivered through the introduction of a new HDT. The test would show whether the number of homes being built is below the required number of homes needed in that area. The test would provide a mechanism for establishing the reasons why there has been an under delivery.

### **Planning for the right homes in the right places: consultation proposals**

- 2.3 Building on the HWP, the Government published the [‘Planning for the right homes in the right places: consultation proposals’](#) in September 2017. This set out proposals to reform the planning system to increase the supply of new homes and increase the local authority capacity to manage growth. The most significant proposal was for the introduction of a standard method for calculating local authorities’ housing need. The standard method (SM) would identify the minimum number of homes expected to be planned for. This proposal marked a huge departure from previous Government policy which required local authorities to prepare a Strategic Housing Market Assessment (SHMA) to identify their housing need figure and the type of housing needed in their area.

### **Planning for the Future**

- 2.4 In March 2020 the Government produced the [Planning for the Future: Policy Paper](#) which set out further plans and funding to support the delivery of homes that local people need. The Government committed to backing well-planned

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<sup>3</sup> Department for Communities and Local Government, Fixing our broken housing market, Introduction, Page 9

development on brownfield land and provided tools to support communities to densify and make best use of under utilised brownfield land. To ensure that communities make land sufficiently available to deliver homes in the right places, the Government continues to drive supply through the HDT raising the threshold to 75% to provide incentives to local authorities to deliver on their Local Plans.

## National Policy Context

- 2.5 The Government reinforced its objective to significantly boost the supply of new homes and making the local authority more accountable for delivery in their area in the new [National Planning Policy Framework](#) (NPPF) (published July 2018 and updated February 2019). Further details were published in the [HDT Measurement Rule Book](#) (July 2018), updated [Planning Practice Guidance](#) (PPG) (paragraph 036 Reference ID: 68-036-20190722) (July 2019) and the [HDT: 2018 Measure Technical note](#) (February 2019).
- 2.6 The methodology for calculating the HDT is set out in the HDT Measurement Rule Book. It measures the number of net homes delivered against the number of homes required over a rolling three-year period<sup>4</sup>.
- 2.7 The formula for the HDT calculation is as follows:

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

- 2.8 The HDT number of homes required was assessed against the Governments [HDT: 2019 Measurement Technical Note](#). The total number of homes required for the three-year period is broken down as follows:
- 2016/17 used 2012-household projections (335 homes),
  - 2017/18 used 2014-household projections (443 homes), and in
  - 2018/19 used the standard methodology local housing need figure (623 homes).
- 2.9 The 2019 HDT results produced by the Government in February 2020 were

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<sup>4</sup> If the housing requirement figure is more than five years old and needs revising, the local housing need figure will be applied to each year of the Housing Delivery Test period.

based on delivery data for the borough over the three period. Table 2 (page 12) demonstrates the annual net homes completed each monitoring year. The HDT results indicated 267 in 2016/17, 130 homes in 2017/18 and 427 homes in 2018/19 were delivered.

- 2.10 In contrast, the council recorded 271 in 2016/17, 231 homes in 2017/18 and 353 homes in 2018/19. In total over a three-year period there has been a difference +31 units between the council's data and that reported to the Government (shown in paragraph 2.8). This was enough to improve the HDT result score from 58% to 60%. The updated data has been provided to the Government, but it has not been accepted<sup>5</sup>.
- 2.11 The HDT result means the council is required to produce an Action Plan as required in paragraph 75 of the NPPF. With an Action Plan already in place, the council has reviewed the existing one to ensure it is fit for purpose. The Action Plan analyses the causes of under delivery and demonstrates the council's commitment to responding positively to the challenge of increasing housing delivery. Appendix 2 sets out the PPG relating to Action Plans.
- 2.12 The NPPF in paragraph 73 requires local planning authorities to demonstrate a 5-year land supply of deliverable housing land plus a buffer depending on the circumstances the local authority falls within. The HDT result means the council is required to add a 20% buffer<sup>6</sup> to improve the prospect of achieving the planned supply<sup>7</sup>.

### **Presumption in favour of sustainable development**

- 2.13 The NPPF in paragraph 11 states that when it comes to decision-making the presumption in favour of sustainable development will apply where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

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<sup>5</sup> The council seeks to provide the most up to date data within all its publications. The data sets are however continuously reviewed as there is often a lag-time between developments being commenced / completed and the council being notified. This means that the council could report an under-delivery of new homes in a monitoring year and then, when notified, will need to retrospectively add these to the correct monitoring year data and re-run and publish the updated data in the next appropriate report. This could include in future versions of the AMR, the HDT Action Plan or the LAA.

<sup>6</sup> This buffer is not in addition to the existing requirement to add a 20% buffer failing to demonstrate a 5 year supply of housing land as required by paragraph 73 of the NPPF.

<sup>7</sup> Footnote 39 of the NPPF states that 'From November 2018, this will be measured against the HDT, where this indicates that delivery was below 85% of the housing requirement'.

- i. The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
  - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 2.14 There is a footnote 7 attached to this section which clarifies what is meant by 'out-of-date'. This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75%) of the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1 of the NPPF. The details of paragraph 11 are presented in Appendix A of the Action Plan,
- 2.15 For clarity, the council is unable to demonstrate 5-year housing land supply (with a 20% buffer) and, as such, the presumption applies in regard to housing land supply. However, it does not apply under the HDT as the council's result for 2019 was 58%.

### **Local Planning Policy**

- 2.16 The Elmbridge Core Strategy was adopted in 2011 prior to the publication of the NPPF in 2012 and has a now out of date housing target of 225 new homes per year. In 2015, the Development Management Plan was adopted. The NPPF published in 2012 introduced major policy changes and in 2016, the council began the process of producing a new Local Plan to replace the Core Strategy and Development Management Plan.
- 2.17 One of the reasons the council is producing a new Local Plan is that the need for new homes as set out in local evidence (as set out in the Strategic Housing Market Area Assessment 2016) and the more recently the Government's national formula for calculating local housing need is significantly higher than the council's current housing target. It is clear that any uplift needed to meet local housing need, cannot be met through the current spatial strategy set out in the Core Strategy. The preparation and adoption of a new Local Plan is recognised as a corporate priority for the council.
- 2.18 To date, the council has carried out three Regulation 18 consultations:



- Strategic Options consultations 2017
- Options consultations 2019
- Vision, objectives and direction for development management policies 2020

2.19 The Local Plan team have continued to further develop the Local Plan evidence base, updating or undertaking additional evidence base studies as required. The current Local Plan timetable can be found in the [Local Development Scheme 2019/22](#). This will be subject to change as a result of the Covid-19 pandemic.

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## 3. Housing Delivery Analysis

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- 3.1 This section examines the causes of the ‘under delivery’ of new homes in the borough and identifies the local and national issues which influence housing delivery. A range of data and intelligence sources have been used to inform this analysis. As part of this process, the council has engaged with stakeholders to improve its understanding of the issues effecting housing delivery. The analysis of the issues has been used to inform what actions the council needs to take to improve its housing delivery.
- 3.2 Building homes is often a complex process, there may be other factors as to why sites for housing do not come forward that are beyond the control of the council. It requires a broader approach to be taken to increase the delivery of new homes and the use of other tools available which are beyond the traditional remit of the Local Planning Authority.

### **Strategic issues influencing delivery**

- 3.3 Delivery of market and affordable homes is a key strategic and cross boundary issue for the council and this is reflected in the [Duty to Cooperate Scoping Statement 2015 \(updated September 2016\)](#). The high demand for new homes and a constrained land supply is a shared characteristic across neighbouring authorities and those within the housing market area<sup>8</sup>.
- 3.4 A key component of the Local Plan preparation is to take account of any potential shortfalls in existing infrastructure provision, and to plan for any additional capacity that may arise because of future growth. The current Infrastructure Delivery Plan (IDP) 2019 and previous IDPs can be found on the [evidence page](#). The council is currently preparing an updated IDP alongside the new Local Plan. This will set out all of the infrastructure required to deliver the growth proposed in the new Local Plan. The IDP will set out what mitigation is required as well as identify funding streams and mechanisms required to enable development. Currently there are local concerns over the impact of growth on the existing infrastructure capacity in particularly the highways network. Therefore, the council is progressing with a Transport Assessment which will highlight any strategic problems and identify mitigation measures required.

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<sup>8</sup> Housing market area partners: Epsom & Ewell Borough Council, Mole Valley District Council and the Royal Borough of Kingston upon Thames

- 3.5 The council fed into the Surrey-wide Infrastructure Study (2017) which identifies the Surrey-wide strategic infrastructure necessary to support growth planned in Surrey to 2031. It highlights the scale of investment required to provide this infrastructure. Work is being undertaken to update this study and the council is inputting into this update.
- 3.6 Outside of the borough, there are several major transport infrastructure projects being proposed. One of these is Heathrow Airport expansion<sup>9</sup> and a proposal for new railway infrastructure<sup>10</sup>. The other is the Crossrail 2 proposal to improve rail connectivity from central London to Surrey. It is considered these major infrastructure proposals are unlikely to lead to a significant increase in the delivery of new homes of the borough's limited land supply.

### Our increasing housing need

- 3.7 The need for housing has increased significantly since the adoption of the Core Strategy (see Table 1). The council's current local housing need figure is 623 homes per year. This is calculated using the standard method as stated in paragraph 60 of the NPPF. An explanation of this calculation can be found in the PPG (002 Reference ID: 2a-002-20190220):

“The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method set out below ([calculation set out in the PPG](#)) identifies a minimum annual housing need figure. It does not produce a housing requirement figure”.

**Table 1 – Local Housing Need**

Source	Status	New homes per year
Core Strategy 2011	Adopted Housing Target (out of date)	225

<sup>9</sup> The council is part of the Heathrow Strategic Planning Group formed in 2015 to discuss holistically how the impacts for expansion can be mitigated - <https://www.heathrowexpansion.com/>

<sup>10</sup> A proposed new railway route would improve access to Heathrow from Surrey. New railway infrastructure could be built even if airport expansion does not progress and could potentially be running by 2027. Heathrow Southern Railway - <https://heathrowrail.com>

Kingston and North Surrey Strategic Housing Market Assessment (SHMA) 2016	Local Housing Need Figure	474
Local Housing Need Figure (as of 2018/19) calculated using the standard method	Local Housing Need Figure	623

- 3.8 As required by national planning policy at the time, prior to the standard method, the council jointly commissioned the Kingston and North Surrey Strategic Housing Market Assessment (SHMA) (2016) which identified a housing need figure of 474 homes per year for the borough. The SHMA also provided a breakdown on the type of homes that were needed locally. This assessment is still required by national policy and, an update to this evidence document is being produced. An Assessment of Local Housing Need is expected to be published alongside the draft Local Plan as part of a Regulation 19 representation period.
- 3.9 It is important to note that the local housing needs figures identified both by the local evidence and the standard method do not represent a housing target. A new housing target will be proposed in the draft Local Plan.
- 3.10 As shown in Table 1 and outlined earlier, there has been a significant increase in the need for new homes, which is considerably higher than the Core Strategy housing target of 225 new homes per year. The current spatial strategy in the Core Strategy does not support this increased need for housing and the council is preparing a new Local Plan to respond this.

### **Local Housing Performance**

- 3.11 The council had a strong record of delivering housing above the Core Strategy housing target. This is demonstrated in the [Authority Monitoring Reports](#) (AMR) which monitor housing delivery against the Core Strategy housing target. In the AMR 2018/19 there were 353 net additional homes completed. This is higher than the adopted (out of date) Core Strategy target and an increase of 122 homes from the previous monitoring year. Since the adoption of Core Strategy in 2011, the average number of new homes delivered each year is 293.

**Table 2 – Annual Net Homes Completed**

<b>Monitoring Year</b>	<b>Homes Completed</b>
2011/12	264
2012/13	214
2013/14	477
2014/15	289
2015/16	242
2016/17	271
2017/18	231
2018/19	353

- 3.12 The forthcoming 2019/20 AMR will monitor delivery against the local housing need figure of 623. This is due to be published by 31 December 2020.

### **Affordability**

- 3.13 The main development pressure across London and the South East is for housing. The borough's proximity to London, the availability of good services, accessibility and high-quality environment mean that this pressure is acutely reflected locally. In fact, the borough's high house prices are more reflective of London than the rest of Surrey.
- 3.14 The SHMA (2016) indicated that the average property price in 2015 was £505,000 (a 63% change between 2007-2015). More up to date information is available from the Office of National Statistics (ONS) and is set out in Table 3. In September 2019 Elmbridge had the 9th highest median house price in England, with the eight higher Local Authority areas all being in London. The average cost of a home in Elmbridge in September 2019 was £581,000. This is 10.3 times the median rate of residents' income of £32,043.
- 3.15 The affordability ratio is the third highest when compared to the other Local Authority areas in Table 3 and the 14th highest when compared to all other areas in England. This means that accessing the property market in the borough is limited for most first-time buyers and even those already established on the housing ladder. Affordability is therefore a significant issue in the borough, and this is reflected in the local housing need.

**Table 3 – Median house price to workplace-based earnings across the entirety of England at September 2019**

Rank	Local Authority	Region	Median house price in 2019 <sup>11</sup>	Median work placed earnings annual earnings in 2019	Ratio of median affordability house prices to work place earnings <sup>12</sup>
1	Kensington & Chelsea	London	£1,307,500	£29,554	9.0
2	Westminster	London	£947,500	£29,929	4.79
3	City of London	London	£918,650	£28,934	11.5
4	Camden	London	£777,000	£29,164	12.7
5	Hammersmith & Fulham	London	£740,000	£29,285	9.5
6	Richmond upon Thames	London	£645,000	£29,697	7.0
7	Wandsworth	London	£630,000	£29,875	5.2
8	Islington	London	£600,000	£29,534	9.0
9	Elmbridge	S. East	£581,000	£32,043	10.3

### **Affordable housing delivery**

3.16 There are about 20 housing associations (Registered Providers) with stock in the borough. They vary in size, ranging from some of the biggest landlords in the UK, to those that are relatively small and very local in their outlook and operation.

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<sup>11</sup> These statistics report the count and median price of all dwellings sold and registered in a given year. They are calculated using open data from the Land Registry, a source of comprehensive record level administrative data on property transactions.

<sup>12</sup> By dividing the house price for a given area by its earnings, ONS produce a ratio which serves as an indicator of relative affordability. A higher ratio indicates that on average, it is less affordable for a resident to purchase a house in their local authority district. Conversely, a lower ratio indicates higher affordability in a local authority. While there are many more factors that influence affordability, the simple ratio provides an overview of geographic differences across England and Wales.

- 3.17 Every one of these associations holds land in some form, by definition of their ownership of stock, whatever the scale. Some have a larger dispersed stock and it is a very mixed picture, in terms of their scale and operations, with a variety of accommodation types and some providing housing and services for a specific need and other for a range of needs.
- 3.18 However, the housing associations operating in the borough, do not own significant land that can be effectively developed to meet local housing need on any scale. Where there are development opportunities, these tend to be dependent on the existing stock being redeveloped, or intensified in density through for example, potential infill development.
- 3.19 Where opportunities exist for development, dependent on individual housing associations' asset management strategies, these tend to be where their existing assets are coming to the end of their viable economic life. Opportunities may arise for redevelopment, potentially with higher densities but only where this feasible in the local context and is a viable development opportunity.
- 3.20 Although the local housing associations have limited land holdings, from time-to-time there are redevelopment options on sites that are already owned or through one-off opportunities, like the redevelopment of obsolete garage sites.
- 3.21 However, many of the opportunities that do arise are constrained or have already been exploited for their housing potential and developed out. Within the constrained opportunities that do exist in the borough, the council works proactively with providers but expects proposals to be policy-compliant and include the delivery of affordable housing units within every development, subject to viability.
- 3.22 The council does not support housing associations/ providers selling off their assets in the borough to realise a housing gain elsewhere, at a later date through cross-subsidy, which does not benefit those in needing housing locally. The high cost of land locally, combined with a limited land supply, means an extra challenge for housing associations/ providers in competing with private developers in the housing market.
- 3.23 Much of the delivery of new affordable housing in the borough comes through Section 106 agreements, where private developers make contributions towards meeting the need for affordable housing locally, which is preferred on site within private development schemes. As a result, the delivery of new affordable housing tends to be through private developers, with a limited

number of additional affordable housing units per site. This affordable housing is complemented by housing associations effectively re-developing their own sites.

- 3.24 To increase the delivery of affordable new homes in the borough, the council has established its own housing company, EBC Homes Ltd which is supported by the Affordable Homes Enabling fund.
- 3.25 During 2018/19, the AMR recorded that 57 new affordable housing units were delivered. This is a decrease of 16 housing units from the previous monitoring year. However, there were 182 affordable homes under construction (an increase of 11 housing units from the previous monitoring year). The delivery of affordable homes remains a critical issue for the borough.
- 3.26 Elmbridge Core Strategy Policy CS21 requires a contribution towards affordable housing from all developments where there is a net increase in dwellings<sup>13</sup>, this includes affordable housing contributions from small sites (fewer than 10 units). The council's statement on [Affordable Housing Provision on Small Sites](#) published April 2019 sets out the council's policy approach and supporting evidence on requiring affordable housing contributions from small sites on a case-by-case basis.

### Housing Mix

- 3.27 The size of new homes being built in the borough has a direct impact on affordability and on the number of new homes being delivered. The SHMA (2016) provides the current published source of information regarding the size, type and tenure of homes needed in the borough. It concluded that there is an overwhelming need for smaller homes. Table 4 below sets out the number of bedrooms required to meet identified need. The SHMA also identified an acute need for affordable housing (primarily social rented tenure).

**Table 4. Mix of housing need based on the SHMA 2016**

Number of Beds	Percentage of Objectively Assessed Housing
1 bed	28%
2 bed	42%
3 bed	29%
4 bed	1%

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<sup>13</sup> Core Strategy Policy CS21 Affordable Housing - <http://www.elmbridge.gov.uk/planning/local-plan/>



- 3.28 Past AMR data has demonstrated that the delivery of new homes consisting of 4 bedrooms or more has achieved significantly greater than 1% identified in the SHMA (2016). This has resulted in a continued oversupply of larger homes worsening affordability and failing to contribute to local housing needs.
- 3.29 To increase the delivery of the type of homes needed locally and to ensure the appropriate optimisation of development land, the council has published a series of [Development Management Advice Notes](#). In conformity with existing policy requirements set out in national planning policy and the Core Strategy and Development Management Plan, the DM Advice Notes explain to developers, planning agents and applicants the local need for certain types and sizes of home, and the importance to optimise land appropriately. The policy position in relation to type and/ or optimisation has been regularly upheld by Inspectors at appeal.
- 3.30 Previously the gross delivery of larger (+4 bedroom) new homes has dominated. However, in 2018/19, the AMR reported that there had been a continued decrease in the percentage of larger homes been delivered over a two-year period and that in the last monitoring period there had been a 11% decrease in the delivery of 4+ bed homes. The reduction in the delivery of larger homes and the progressive delivery of smaller units in the borough is outlined in Table 5.
- 3.31 It is important to note that the AMR monitors housing completions only and not granted planning permissions, therefore the data presented in the AMR does not include residential schemes in the development pipeline. The DM Advice Notes 1-4 were published in 2018/19. Therefore, it will take time to see any real change in the delivery of homes due to the development pipeline<sup>14</sup>.

**Table 5. Comparison of gross<sup>15</sup> delivery by housing units over the two previous financial years**

Years	1 bed	2 bed	3 bed	4+ bed	Total
2017/18	70	99	40	130	339

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<sup>14</sup> The time taken for a planning permission to be realised and for a new home to be completed.

<sup>15</sup> The breakdown of housing can only be provided as a gross figure. This is because there is no clear way of identifying the direct replacement dwelling and discounting it.

<b>Percentage</b>	21%	29%	12%	38%	100%
<b>2018/19</b>	91	124	85	113	413
<b>Percentage</b>	22%	30%	21%	27%	100%
<b>Difference</b>	+1%	+1%	+9%	-11%	

### Housing land supply

- 3.32 One of the key issues affecting the delivery of new homes is that the borough's land supply is severely limited. The borough is embedded in the Metropolitan Green Belt which permeates 57% of the borough<sup>16</sup>. The Government and the council attach great importance to Green Belt land. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and maintaining its openness and permanence. The NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances through the plan making process.
- 3.33 In addition, the land in the borough has a high nature conservation value and some has international importance too. There are three Sites of Special Scientific Interest (SSSI) located within the borough<sup>17</sup>. The borough is characterised by extensive green areas including woodland, ancient woodland, common land, farmland, rivers, reservoirs and parkland. It includes the Thames Valley with the River Thames and its floodplain, the Thames Basin Heath and the Thames Basin Lowlands. There are historic landscapes at Claremont, Painshill and Oatlands Park. Together this means the borough has a high quality, distinctive landscape with significant landmarks. The presence of these landscape characteristics results in limited development opportunities for delivering new housing on a large scale.
- 3.34 The council has already carried out a number of evidence base studies looking at availability and supply of sites for delivering new homes. As a result of the updated NPPF 2019 the list of constraints is now referred to as the 'national constraints' in a definitive list; a review of this has been undertaken. The

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<sup>16</sup> See Appendix 4 for Borough Map of the Metropolitan Green Belt.

<sup>17</sup> Esher Common SSSI comprising parts of Esher Common, West End Common, Fairmile Common and Oxshott Heath. Ockham and Wisley SSSI has a relatively small area in Elmbridge. Knight and Bessborough Reservoirs SSSI, Hurst Road, Molesey.

Review of the Absolute Constraints (2016 and updated 2019)<sup>18</sup> identified where development should be restricted as the harm could not be mitigated<sup>19</sup> and it concluded that the supply of suitable land is limited by national constraints.

- 3.35 To identify the extent of deliverable and developable land for housing, employment and retail development, a Land Availability Assessment (LAA) (2018) was published as part of the Local Plan preparations utilising the existing spatial strategy. It identified the number of sites where new homes could be delivered in the urban area. A general presumption against development in the Green Belt, allotments and designated / non-designated open space was taken. The sites identified to deliver future new homes consisted of a combination of sites with planning permission that have not yet been implemented, new homes on opportunity sites, and houses on windfall sites<sup>20</sup>.

### **Small sites**

- 3.36 The LAA highlighted that there were limited large sites available for delivering new homes and that the supply consisted of mainly small sites. Small sites therefore have a significant role to play in the delivery of new homes. The analysis of planning permission granted demonstrates that the majority of development taking place is on sites of less than 0.5 hectares and that the average development site in the borough is 0.11 hectares. Table 6 below shows that during 1 August 2011 to 31 March 2019, 1,262 planning applications granted planning permission were for developments of fewer than 10 gross units which equated to 95% of total applications over the monitoring period. In the future, it is expected that small sites will continue to be a significant source of housing delivery as evidence through the LAA (2018) and the emerging 2020 version.

### **Five Year Housing Land Supply**

- 3.37 The AMR 2018/2019 sets out the current housing land supply calculation and position. The council is currently unable to demonstrate a 5-year housing land

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<sup>18</sup> Review of Absolute Constraints (2016 and updated 2019), <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

<sup>19</sup> Based on NPPF footnote 6 for paragraphs 176.

<sup>20</sup> Opportunity sites had been identified as those having potential for development in the future but do not benefit from planning permission. Windfall sites had been identified as those of four homes or less that are on previously developed land that are likely to come forward for development in the future.

supply against its housing need figure as per the requirement of the NPPF<sup>21</sup>.

- 3.38 The council is committed to responding positively to the challenge of increasing the delivery of new homes and a number of evidence base studies have been undertaken to review the supply of future housing sites. These have been published on the Local Plan evidence page and included undertaking an Urban Capacity Study. A further call for sites was undertaken in the summer 2019 and a refresh of the LAA 2018 is being prepared.

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<sup>21</sup> NPPF paragraph 73 - <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

**Table 6 – Gross dwellings and number of applications granted planning permissions by scheme size, 2011-2019**

Year of approval	Fewer than 10 units	% of total units	Apps granted PP with fewer than 10 units	% of total app.	More than 10 units	% of total units	Apps granted PP with more than 10 units	% of total app.	Total units (gross)	Total apps
2011/12 <sup>22</sup>	165	51	102	94	158	49	6	6	323	108
2012/13	246	77	174	98	73	23	3	2	319	177
2013/14	253	60	140	95	169	40	7	5	422	147
2014/15	317	92	179	99	28	8	2	1	345	181
2015/16	214	24	158	89	696	76	19	11	910	177
2016/17	375	77	179	97	110	23	6	3	485	185
2017/18	309	48	156	95	334	52	9	5	643	165
2018/19	356	31	174	94	799	69	12	6	1155	186
<b>Total</b>	<b>2,235</b>	<b>49</b>	<b>1,262</b>	<b>95</b>	<b>2,367</b>	<b>51</b>	<b>67</b>	<b>5</b>	<b>4,602</b>	<b>1,329</b>

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<sup>22</sup> Data is from the date of the implementation of the Core Strategy (1 August 2011) up to 31 March 2012

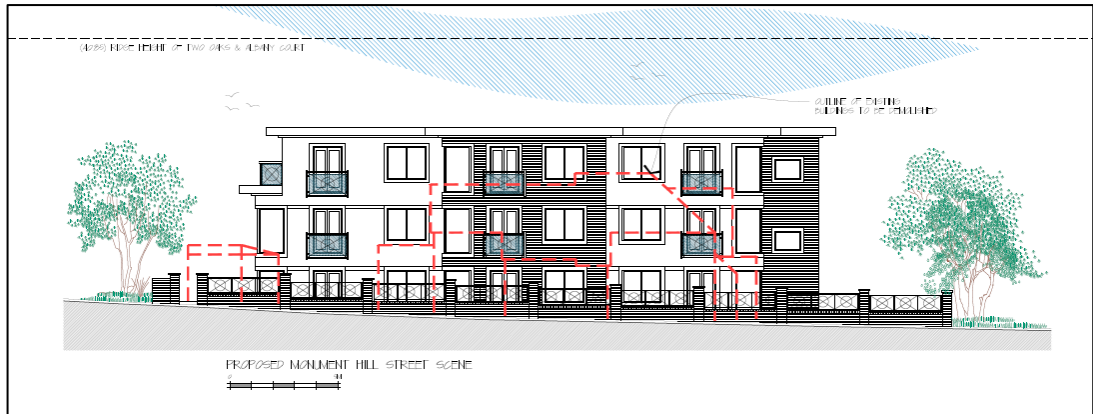
## Density

- 3.39 Much of the borough is characterised by low density developments. This is particularly obvious in the borough's three special low-density areas; St. George's Hill Estate, Burwood Park and the Crown Estate, Oxshott with St. George's Hill protected by an act of Parliament. There are only three high rise tower blocks which are ten storeys in height, which are all located in Walton-on-Thames.
- 3.40 Past AMRs have recorded low densities in residential developments across the borough, but it is important to note that the AMR monitors completions and not granted planning permissions. There is, therefore, a time lag in the planning permissions being granted and the building and completion of the development. The Density Study 2019 which has been prepared as part of the evidence base for the new Local Plan focuses on granted planning permissions.
- 3.41 The existing character of the area can be seen as having an influential role on maintaining density or as a barrier to increasing the density that new development is delivered at. New developments must be designed to respect the character and appearance of the area and there are good examples of higher-density development which have been successfully delivered in the borough. This includes Matham Court and Prior Court (see Figure 1 below), Monument View (see Figure 2 below) and Walton Court (see Figure 3 below).



**Figure 1: Matham Court and Prior Court, Island Farm Road, Molesey, 125dph**

- 3.42 Matham Court and Prior Court is located on Island Farm Road opposite Molesey Industrial Estate. Following the demolition of a public house, the new development provides twenty flats, at 125 dph.



**Figure 2: Monument View, 99 Baker Street, Weybridge, 275dph**

3.43 Monument View is located in Weybridge’s retail centre, it is a high-density development that has been delivered in the urban area without impacting on the character of the area. It has a high density of 275 dph, containing 11 flats, following demolition of a vacant public house.



**Figure 3. Walton Court, Station Avenue, Walton-on-Thames, 136 dph**

3.44 Sitting within a site of approximately 2.67 hectare, Walton Court (previously Grade II listed) was formerly a three-storey office building. The site is currently being redeveloped to provide 375 units at 136 dph. The site is well served by public transport and is in close proximity of Walton Station on Station Avenue.

3.45 Given the high need for new homes and the constrained housing supply, it will be crucial that new developments coming forward make the most efficient use of land. The council has published a [Development Management Advice Note](#)

2: Optimising Development Land. This approach is supported by the NPPF policy that where there is a shortage of land for meeting identified housing need, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of each site.

- 3.46 The NPPF promotes the use of minimum density standards for town centres and other locations that are well served by public transport. Where there is a shortage for meeting identified need or anticipated shortage, developments should avoid being built at low densities and should use land efficiently. LPAs should consider the use of minimum density standards for other parts of the plan area. This is an important consideration for the new Local Plan as many of the borough's train stations are located away from the shopping centres and are often in the Green Belt. In addition, currently there are designated Special Low-Density Areas which may not be appropriate to retain. The council will consider creative solutions to accommodate more housing in the borough's urban areas such as increasing density, optimising development land and delivering more flats and smaller homes to increase housing delivery. This is supported by the SHMA (2016) which identified an overwhelming need for smaller homes (1 to 3 bedrooms) in order to widen the choice of new homes in the borough. The new Local Plan will ensure that the most efficient use of land is achieved appropriate to the location of development.

## **Viability**

- 3.47 The borough has some of the highest land values and property prices in the country. Based on a review of viability evidence, viability is not considered to be an issue that is preventing developers from delivering new homes in the borough. In the past land values and the market have heavily influenced the type of housing being delivered in this borough and resulted in the dominance of large 4 bed plus luxury homes.
- 3.48 The council has always sought to maximise affordable housing provision and continues to apply Core Strategy Policy CS21 Affordable Housing<sup>23</sup> on a case by case basis. The Statement on Affordable Housing Provision on Small Sites published April 2019 sets out evidence supporting the council's approach. It reviews the effectiveness of Policy CS21 including a viability analysis that demonstrates that contributions to affordable housing from sites with fewer than 10 units are viable in principle alongside Community Infrastructure Levy

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<sup>23</sup> Core Strategy 2011 - <http://www.elmbridge.gov.uk/planning/local-plan/>



(CIL) rates.

- 3.49 The council has introduced a new viability consultancy framework to support the implementation of the current affordable housing policy. This provides the council with greater choice and expertise when seeking independent review of viability assessment submitted with planning applications. Work is underway to produce a new viability assessment to support the emerging Local Plan and affordable housing policy requirements. Unless there are particular circumstances, that have arisen post adoption of the new Local Plan, there will be no need for a further viability assessment at the decision-making stage. This will provide greater certainty for the delivery of affordable homes in the borough.

## **Site delivery**

### **Implementation of planning permission and market conditions**

- 3.50 The council has ongoing dialogue with developers, agents and site promoters to monitor build out rates, obtain information on barriers to delivering new homes and market conditions. In general, the current market conditions and demand reflect the local need to deliver smaller homes. There are no major barriers preventing the implementation of existing permissions or housing delivery such as viability or land banking.

### **Decision-making performance**

- 3.51 The performance of decision making in the council's Planning Services is not considered to be a barrier to delivering new homes. On the whole, planning applications are being processed within the statutory timeframes. The AMR 2018/19 reported 77% of major planning applications were processed within the statutory 13-week period. Although below the council's target of 83%, it is above the national target of 60%. For minor applications, where the statutory time period to process an application is 8 weeks, 86% were processed within this timeframe, exceeding both the council's target of 83% and the national target of 65%. It is reasonable to conclude that based on these statistics the processing of planning applications is not preventing the granting of planning permission and in turn the delivery of new homes.
- 3.52 On those sites where planning permission is refused, the council's performance is good (see Table 7 below). During 2018/19, 65% of planning appeal decisions were dismissed. These statistics demonstrate the soundness of decision making by the council and that unsound decisions are not leading to unnecessary delays and costs to the delivery of new homes.

**Table 7: Planning Service Appeals Performance**

	<b>Appeals Allowed</b>	<b>Appeals Dismissed</b>
April to June 2018 (Q1)	34%	66%
July to September 2018 (Q2)	32%	68%
October to December 2018 (Q3)	63%	37%
January to March 2019 (Q4)	32%	68%
<b>2018/19</b>	<b>35%</b>	<b>65%</b>

### **Borough-wide infrastructure**

- 3.53 The council has considered whether the current provision of infrastructure in the borough is acting as a barrier to delivering new homes. For the current planning permissions in place, there are no infrastructure barriers preventing the commencement of sites.

### **Conclusion**

- 3.54 The high demand for housing and the need to deliver more new homes is a pressure not only felt by this borough but also across the other authorities in the Housing Market Area and neighbouring authorities.
- 3.55 The council had a successful record of delivering new homes against the Core Strategy target of 225 homes per year. However, the need for new homes has increased significantly to 623 per year. Such an increase cannot be met by the existing spatial strategy and this has resulted in the council underperforming in the delivery of new homes against the number of new homes needed.
- 3.56 The borough continues to experience significant affordability issues and has some of the highest prices in the UK, similar to the levels experienced in some London boroughs. It means that the need for affordable homes is significant. The council is continuing with its Core Strategy Policy CS21 and seeks to require affordable housing contributions on case by case basis on all net additions including those on small sites.
- 3.57 Despite the evidenced need for smaller homes and affordable housing as per

the SHMA (2016) and the policies in the Core Strategy and Development Management Plan which seek a balance in the type and size of new homes delivered, the figures presented in previous AMRs highlighted the continued delivery of large sized homes consisting of four bedrooms plus. In response to this issue, the council published a [Development Management Advice Note on understanding housing need for developers and planning agents](#).

- 3.58 Due to the development 'pipeline' and the length of time taken for planning permissions to be realised as completions, it is expected that it may take a number of monitoring years for the approach as set out in the advice note to be proved effective. Notwithstanding this, the monitoring data for 2018/19 reported that 74% of the total completions were smaller homes (1, 2 and 3 bed) which is an improvement upon previous monitoring years.
- 3.59 The borough is heavily constrained by land designations which means much of the housing land is severely limited. The LAA (2018) showed there were a limited number of large sites in the borough and the housing land supply comprised mainly of small sites. Small sites will continue to play an important role in the delivery of new homes in the future.
- 3.60 Given the borough's high need for new homes and constrained land supply, it is essential that development proposals make the optimal use of land and that any new homes proposed meet the identified need. The council has published a [Development Management Advice Note on optimising development land to support this approach](#). Development schemes should be innovative and utilise higher densities while respecting the local character. The recent AMR indicates that the average density of new housing developments is increasing although still low. The average density of housing developments in the AMR refers to completions and there is a lag time between developments with granted planning permission and developments that are completed (see paragraph 3.42). However, it should be noted that density should not be taken as sole measure of optimisation or an indicator of a development's acceptability.
- 3.61 The AMR 2018/19 analyses the council's speed and quality of decision making. The council continues to exceed national targets and demonstrate good appeal performance.
- 3.62 On -going feedback from developers, agents and site promoters highlights that the current market conditions and demand reflect the local need to deliver smaller homes. There are no major barriers preventing the implementation of existing permissions or housing delivery such as viability or land banking.

- 3.63 Within this challenging context, the council is carrying out further assessments on sites and continues to liaise with developers and site promoters in order to increase the supply of developable<sup>24</sup> sites for housing. Further evidence base studies will be published alongside the draft Local Plan (Regulation 19).
- 3.64 The council is committed to positive decision and plan-making and is working hard to respond to the high need for new homes through the Local Plan preparations. The council continues to pro-actively engage with developers, planning agents and applications through the pre-application advice service to encourage the submission of development schemes that make efficient use of land and meet our housing needs.

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<sup>24</sup> NPPF (2019) defines developable to mean: to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could viably developed at the point envisaged

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## 4. The Action Plan

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- 4.1 This section sets out the actions that the council has already taken to increase housing delivery and the future actions required to continue this work. It also reflects on the progress the council has made in implementing the 2019 Action Plan.
- 4.2 The council is fully committed to working proactively and is utilising the full range of tools and processes at its disposal. It is acknowledged that the delivery of new homes has a wider remit than just the Planning Service and requires actions to be undertaken by other council services including the Housing and the Asset and Property Management Services.
- 4.3 As set out in in chapter 1, the 2019 HDT score was 58% (down 4% from the previous year. This is because the last year of the rolling 3-year period, is tested against a higher housing need figure (623 per annum as per the standard methodology calculation). The wider local and national barriers to delivering new homes have not significantly changed since the publication of the 2019 Action Plan.
- 4.4 The council will continue to collaborate with registered providers and housing companies to deliver affordable homes. The Action Plan demonstrates that there has been ongoing commitment to deliver affordable housing including the recent adoption of a new Housing, Homelessness & Rough Sleeping Strategy to support the delivery of at least 300 affordable homes between April 2020 and March 2024. The council is continuing its efforts to increase affordable housing and is progressing with its new company, EBC Homes Ltd which is supported by the Affordable Homes Enabling fund which saw an increase in funds last year.
- 4.5 Other new opportunities to speed up the delivery of new homes include the revision of the pre-application advice service proposed to be implemented in September 2020<sup>25</sup>. The aim of the revised service is to improve the quality and speed of advice given to applicants and developers in advance of the submission of a planning application.
- 4.6 The council has also started to use Planning Performance Agreements (PPAs) for major development schemes at pre-applications and planning applications

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<sup>25</sup> This is an approximate timeframe for implementation which may be subject to review following the Covid-19 pandemic

stage. Encouraged by Government, a PPA is a project management tool which the local planning authority and applicants can use to agree timescales, actions and resources for handling particular applications. They encourage joint working between the applicant and local planning authority and can also help to bring together other parties such as statutory consultees.

- 4.7 The need to produce a new Local Plan with an up to date housing target continues to be a corporate priority to boost housing delivery and respond positively to the borough's identified housing needs. Since the publication of the 2019 Action Plan, progress has been made, including undertaking two Regulation 18 consultations and the preparation of and consultant on the update to the Developers Contributions SPD. This work was undertaken in accordance with the council's current Local Development Scheme 2019-2022, however, this existing timetable is being reviewed following the implications of the Covid-19 pandemic. This is likely to lead to delays in preparing the draft Local Plan, undertaking a Regulation 19 representation period and submission to the Planning Inspectorate.
- 4.8 Alongside the Local Plan preparation, the council will continue to closely monitor housing delivery and sites to provide an accurate picture of land availability within the borough.

## What have the council done so far?

- 4.9 The tables below set out the wide range of positives actions that the council has already the delivery of the housing we need. These actions have carried out across the council's Planning, Housing and Asset Management and Property services.

**Table 8. Local Plan Progress**

Action	Department Responsible	Delivery Date
✓ A Duty to Cooperate Scoping Statement was produced as part of the background work required to prepare the new Local Plan and is available to view online. <sup>26</sup> The Scoping Statement sets out the scope of the new Elmbridge Local Plan, identifying strategic matters, who the council needs to be constructively engaged with and how and when it is proposes to do so.	Planning Services	January 2015 (updated September 2016)
✓ Contacted all applicants, agents and developers who have been an unimplemented planning permission to find out if there are any issues preventing the delivery of housing.	Planning Services	Summer 2018
✓ Deliver an annual Members' (Councillors) training programme to assist Members making sounds planning decisions.	Planning Services	2018/19 and 2019/20.
✓ Updated the Statement of Community of Involvement, which sets out how the Planning Department consults the public on planning policy documents and planning applications. The Statement of Community Involvement has been published on the council's website.	Planning Services	December 2018
✓ Have an update adopted <b><u>Local Development Scheme (LDS)</u></b> published online which sets out the timeframe for progressing the new Local Plan.	Planning Services	October 2018 and December 2019

<sup>26</sup> <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

✓ Published a series of evidence base documents that supported our three Regulation 18 consultations. Further evidence base documents are in the process of being updated or prepared prior to the draft Local Plan representation period. This work includes a refresh of the Land Availability Assessment which takes into account sites provided by landowners through our 'call for sites'.	Planning Services	August 2019 January 2020
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**Table 9. Improving Decision Making**

<b>Action</b>	<b>Department Responsible</b>	<b>Delivery Date</b>
✓ Introduced a new service offering planning performance agreements (PPAs) for major development proposals. This service received an early uptake and PPA's have been utilised at either the pre-application or planning application stage.	Planning Services	January 2018
✓ The Local Validation Checklist has been reviewed and updated with clear expectations. This seeks to reduce the number of invalid applications and the length of time they are recorded as invalid. To improve transparency, viability assessments are requested to be published up front. The improved local validation list is available to view online <sup>27</sup> .	Planning Services	October 2018
✓ Published online the Development Management Advice Note 1: Understanding Housing Need. This advice note explains what types of homes are required (smaller homes consisting of 1 to 3 bedrooms) to meet the identified housing need and how	Planning Services	November 2018

<sup>27</sup> Local Validation Checklist - <http://www.elmbridge.gov.uk/planning/make-a-planning-application/>



development proposals for residential schemes must make a positive contribution towards meeting the types of homes needed.		
✓ Published online the Development Management Advice Note 2: Optimising Development Land. This advice note explains to applicants and agents about the importance of making efficient use of the land coming forward for development and the council's approach to ensuring the optimisation of development land when assessing development proposals	Planning Services	November 2018
✓ Published online an updated Statement on the Affordable Housing Provision on Small Sites following the revisions made to the NPPF in July 2018. This statement sets out evidence to support the council's policy approach in Policy CS21 and requiring affordable housing contributions on small sites.	Planning Services	April 2019
✓ Established a consultancy framework to provide greater choice and expertise for independently reviewing viability assessments submitted as part of planning applications.	Planning Services	December 2019

**Table 10. Supporting Affordable Housing Delivery**

<b>Action</b>	<b>Department Responsible</b>	<b>Delivery Date</b>
✓ The AMR 2018/19 recorded that 57 affordable homes had been delivered. This was down from the previous monitoring year, however, there was 182 affordable homes under construction. The newly established council-owned housing company with the aim of building homes to meet the needs of residents was created February 2018. There was an increase of funds committed to the	Planning Services and Housing Services	March 2019

housing enabling fund of which £3,000,00 has been redistributed to support the new council-owned housing company.		
✓ The adoption of the Housing, Homelessness and Rough Sleeping Strategy <sup>28</sup> brought in five core priorities and a vision to tackle housing. In particular, Priority 1 was to aim to deliver more affordable housing across the borough.	Housing Services	December 2019
✓ Establish a Community Wellbeing Priority R3 in the Elmbridge Council Plan 2019/20 to deliver and provide the type of affordable housing for the borough that will meet the needs of the local community through investment or development. The Planning and Housing Departments are facilitating the delivery of affordable housing in the area.	Asset Management and Property Services	March 2020 (Elmbridge Council Plan 2019/20)
✓ Establish a Community Well-being Priority in the Elmbridge Council Plan 2019-20 to help meet the need for affordable housing through a housing company owned by the council.	Housing Services	March 2020 (Elmbridge Council Plan 2019/20)
✓ 10 affordable homes with planning consent at Ansell Hall, Oakbank Avenue – Land being sold by EBC to PA Housing.	Asset Management and Property Services	December 2018
✓ 5 affordable homes having secured planning consent in January 2018 are being provided at Albemarle House in Thames Ditton.	Asset Management and Property Services	January 2019
✓ 50 affordable homes to be delivered on the former Molesey Centre for the Community, School Lane, East Molesey	Asset Management and Property Services	March 2020 - 20 completed (30 planned in 2020/21).
✓ 9 affordable homes delivered in 2019/20 at Stompond Lane, Walton-on-Thames.	Asset Management and Property Services	March 2020
✓ 5 affordable homes are being provided through the redevelopment of Weybridge Hall having secured planning permission in April	Asset Management and Property Services	Permission secured April 2018, completion expected Summer 2021

<sup>28</sup> Housing, homelessness and rough sleeping strategy 2020-2024 - <https://www.elmbridge.gov.uk/housing/housing-strategies-and-policies/>

2018 to convert the hall to a cinema and the upper floors to residential use.		
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**Table 11. Supporting Wider Housing Opportunities**

Action	Department Responsible	Delivery Date
<p>✓ The Community Infrastructure Levy (CIL) was implemented in 2013. These contributions are used to fund local infrastructure in the borough. The implementation of CIL has resulted in reducing the amount of time spent on negotiating Section 106 Agreements between developers and the council. During the 2018/19 monitoring board period, there has been meeting for both the Local and Strategic Spending Boards. Monies have been secured for the delivery in a number of infrastructure project. The details of these are outlined in the <b>CIL Annual Spending Report</b> which is published on the councils website.</p>	Planning Services	April 2013 CIL Annual Spending Report prepared and published annually
<p>✓ In 2014, the council implemented several Article 4 Directions on sites of Strategic Employment Land. This provides better protection of employment assets and brings back the need for planning permission. It provides the council much greater control over the type and location of development. The Article 4 Direction covers the following areas:</p> <ul style="list-style-type: none"> <li>• Brooklands Industrial Estate</li> <li>• Hersham Trading Estate (including North Weylands Trading Estate)</li> <li>• Molesey Industrial Estate</li> <li>• Riverdene Trading Estate</li> </ul>	Planning Services	October 2014

✓ Published <b>Brownfield Land Register</b> (BLR) for the borough in 2017 which identifies suitable sites for housing using previously developed land. The register is updated on an annual basis. There are currently 54 sites identified on the council's BLR.	Planning Services	2017, May 2019 & updated January 2020
✓ Established an online <b>Self-Build and Custom Build Register</b> . The register provides the council with an indication of the demand for self and custom build homes. Data collated from the register is reported in the AMR which is published annually.	Planning Services	Register established 2017- ongoing
✓ Based on evidence provided as part of planning applications, where it has been demonstrated that the continued use of the site for employment uses is no longer appropriate or viable, the council has permitted these areas to be redeveloped for residential use.	Planning Services	Ongoing
✓ Prepare and adopt a new Housing, Homelessness & Rough Sleeping Strategy.	Housing Services	November 2019

### What more can the council do?

4.10 The council will continue to positively seek out further opportunities to increase housing delivery as set out in the tables below. The council will work across its services and with external organisations to achieve these.

**Table 12. Local Plan Progress**

Action	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> <li>Through the Local Plan preparation, the council will respond positively to</li> </ul>	Planning Services	December 2021 (Elmbridge	The Local Development Scheme is to be reviewed, and the timetable updated to

<p>the challenge of housing need and identify a sustainable growth strategy by establishing a housing target and adopting a new Local Plan. This is supported by the Elmbridge Council Plan 2020-2021 'Character and Development' priority to publish the draft Local Plan and submit it to the Planning Inspectorate for Examination.</p>		Council Plan 2020/21)	reflect the delay of the preparation of the draft Local Plan due to Covid-19 pandemic.
<ul style="list-style-type: none"> <li>As part of the Duty to Cooperate, the council will work with its neighbouring authorities to produce a Statement of Common Ground. The Statement will focus on strategic cross-boundary issues such as housing, it will note where agreement has and has not been met.</li> </ul>	Planning Services	Ongoing	Ongoing
<ul style="list-style-type: none"> <li>Continue to monitor sites to support an accurate Land Availability Assessment (LAA) to inform the draft Local Plan.</li> </ul>	Planning Services	Ongoing	Ongoing. The LAA 2018 was published in August 2019 alongside the Options Consultation. A refresh of the LAA is being undertaken and this will inform the draft Local Plan and will be published at the Regulation 19 representation period.
<ul style="list-style-type: none"> <li>Complete new viability work to support the new Local Plan, to strengthen the council's position to increase the provision of affordable homes in the borough.</li> </ul>	Planning Services	September / October 2020	Ongoing. The viability work is being undertaken and this will inform the draft Local Plan and will be published at the Regulation 19 representation period.

<ul style="list-style-type: none"> <li>Review maximum density standards within the current low-density designated areas</li> </ul>			The Local Development Scheme is to be reviewed, and the timetable updated to reflect the delay of the preparation of the draft Local Plan due to Covid-19 pandemic.
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**Table 13. Improving Decision Making**

Action	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> <li>Review and update the Developers Contributions Supplementary Planning Document (SPD).</li> </ul>	Planning Services	July 2020	<p>A draft revised SPD has been prepared and subject to public consultation. It is expected that the updated SPD will be adopted by the council in July 2020.</p> <p>A further review and update of the SPD will be required following the adoption of the Local Plan. This will be prepared in accordance with the Local Development Scheme.</p>
<ul style="list-style-type: none"> <li>Review the standard conditions list for planning applications.</li> </ul>	Planning Services	Ongoing	Ongoing
<ul style="list-style-type: none"> <li>Continue to reduce the number of applications determined after the statutory deadline.</li> </ul>	Planning Services	Ongoing	Ongoing
<ul style="list-style-type: none"> <li>Continue to determine application in accordance with current National and Local targets.</li> </ul>	Planning Services	Ongoing	Ongoing

<ul style="list-style-type: none"> <li>Continue to develop and offer a proactive pre-application service<sup>29</sup> to support the delivery of sustainable development.</li> </ul>	Planning Services	September 2020	A new updated pre-application service is ready to be implemented. The estimated date is September 2020, although this could be subject to delay following the Covid-19 pandemic.
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**Table 14. Support Wider Housing Opportunities**

Action	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> <li>Continue dialogue with developers and landowners to monitor build out rates and obtain information on barriers to delivering housing. This will help support and produce accurate evidence to support a new housing target and trajectory for the new Local Plan.</li> </ul>	Planning Services	<p>March 2021 (Elmbridge Council Plan 2020/21)</p> <p>December 2021 (Local Development Scheme)</p>	<p>Ongoing</p> <p>The Local Development Scheme is to be reviewed, and the timetable updated to reflect the delay of the preparation of the draft Local Plan due to Covid-19 pandemic</p>
<ul style="list-style-type: none"> <li>Review publicly owned sites and work with external organisations who own land in this borough to identify potential opportunities for housing development and or land swaps. This</li> </ul>	Asset Management and Property Services	March 2021 (Elmbridge Council Plan 2020/21)	Ongoing

<sup>29</sup> The most update version of the council's pre-application service is found on the website - <https://www.elmbridge.gov.uk/planning/preapp/>

will involve working with Surrey County Council and other stakeholders to develop ways to free up land for regeneration projects. In particular, areas presenting regeneration opportunities such as Lower Green (Character and Development – Elmbridge Council Plan 2020/21).			
<ul style="list-style-type: none"> <li>To adopt a reviewed CIL Levy Charging Schedule to support the Local Plan</li> </ul>	Planning Services	December 2021 (Local Development Scheme December 2019-2022)	Ongoing. Evidence is being prepared as part of the viability work being undertaken to support the new Local Plan. It is expected that consultation on a revised charging schedule will be published alongside the Regulation 19 draft Local Plan. The timetable for this is under review as the Local Development Scheme is updated as a result of the Covid-19 pandemic.
<ul style="list-style-type: none"> <li>Evolve CIL programme as required by amended CIL Regulations, replacing the Regulation 123 list with an Annual Infrastructure Funding Statement (AIFS) and publish the first AIFS.</li> </ul>	Planning Services	December 2020	Ongoing
<ul style="list-style-type: none"> <li>Next Local CIL project allocations made in June/ July 2021 by Local Spending Boards, and Strategic CIL project allocations made by June/July 2021</li> </ul>	Planning Services	June and July 2021	Ongoing



<ul style="list-style-type: none"> <li>Review and update the Infrastructure Delivery Plan.</li> </ul>	Planning Services	December 2020	Ongoing. An updated IDP will be published alongside the draft Local Plan. The timetable for this is under review as the Local Development Scheme is updated as a result of the Covid-19 pandemic.
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**Table 15. Support Affordable Housing**

Action	Department Responsible	Delivery date	Progress
<ul style="list-style-type: none"> <li>Continue to progress the establishment of the housing company and deliver an increase of 40 units in the supply of affordable housing (Community and Wellbeing - Elmbridge Council Plan 2020/21).</li> </ul>	Housing Services and Asset Management and Property Services	March 2021 (Elmbridge Council Plan 2020/21)	Ongoing
<ul style="list-style-type: none"> <li>Ensure the transfer of key sites, currently in the ownership of public sector partners, in support of affordable housing priorities (Character and Development - Elmbridge Local Plan 2020/21).</li> </ul>	Asset Management and Property Services	March 2021 (Elmbridge Council Plan 2020/21)	Ongoing
<ul style="list-style-type: none"> <li>As part of the new Housing, Homelessness &amp; Rough Sleeping Strategy support the delivery of at least 300 affordable homes between April 2020 and March 2024</li> </ul>	Housing Services	March 2024	Ongoing

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## 5. Next steps

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- 5.1 The 'Actions' set out in the previous tables range from short to long term in their implementation. The Action Plan will be monitored and reviewed by the council on an annual basis.
- 5.2 The 'Actions' will be implemented by those services indicated in the 'Department Responsible' column. Monitoring information will be collected from a range of sources such as the AMR, the Elmbridge Council Plan, the Planning Service Delivery Report, Quarterly Returns, appeals monitoring and housing trajectory along with any other relevant documents.
- 5.3 Actions will be updated where necessary and new actions will be added in response to any changes in local and national circumstances such as those following the Covid-19 pandemic and in response to legislation, Government policy and practice guidance updates.
- 5.4 The council welcomes your suggestions on any future actions to help increase housing delivery in the borough. You can contact the Planning Policy and Strategy Team with your suggestions

**Email:** [planningpolicy@elmbridge.gov.uk](mailto:planningpolicy@elmbridge.gov.uk)

**Telephone:** 01372 474 474

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## 6. Appendix 1: National Planning Policy Framework

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**Ministry of Housing, Communities and Local Government  
National Planning Policy Framework  
February 2019**

### **The presumption in favour of sustainable development**

#### **Paragraph 11:**

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this meant that:

- a) Plans should positively seek opportunities to meet the development need of their area, and be sufficiently flexible to adapt to rapid change;
- b) Strategic policies should, as a minimum, provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless(5):
  - i. The application of policies in this Framework that protect areas or assets of particular importance and provides a strong reason for restricting the overall scale, type or distribution of development in the plan area(6); or
  - ii. Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date(7), granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed(6); or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnotes:

5 As established through statements of common ground (see paragraph 27)

6 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

7 This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

Transitional arrangements for the Housing Delivery Test are set out in Annex 1.

## **Maintaining supply and delivery**

### **Paragraph 73:**

Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies (36), or against their local housing need where the strategic policies are more than five years old (37). The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan (38), to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (39).

### **Paragraph 75:**

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.

Footnotes:

36 For the avoidance of doubt, a five-year supply of deliverable sites for travellers – as defined in Annex 1 to Planning Policy for Traveller Sites – should be assessed separately, in line with the policy in that document.

37 Unless these strategic policies have been reviewed and found not to require updating.

For the purposes of paragraphs 73b and 74 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.

38 For the purposes of paragraph 73b and 74 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.

39 From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

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## 7. Appendix 2: Planning Practice Guidance

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### **What is the Housing Delivery Test Action Plan<sup>30</sup>?**

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 reduced the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

### **Who can produce an action plan?**

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

Apart from where an action plan is required as a consequence of the HDT, 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 HDT, such as National Park Authorities, the Broads Authority and development corporations without (or which do not exercise) both plan-making and decision-making function, the use of an action plan is encouraged where appropriate to help identify any causes of under delivery and actions to address these.

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

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

- Small and large developers
- Land promoters
- Private and public landowners
- Infrastructure providers (such as utility providers, highways, etc) and other public bodies (as Home England)
- Upper tier authorities (county councils) in two-tier areas
- Neighbouring authorities with adjoining or cross-boundary sites

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<sup>30</sup> <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test>

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

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

- Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales
- Barriers to delivery on sites identified as part of the 5 year land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy sections 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc).
- Whether the sufficient planning permissions are being granted and whether they are determined within statutory time limits
- 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.

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

Actions to boost delivery could include:

- Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development 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 unblock 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

### **When can the action plan be published?**

To ensure the document is as useful as possible local planning authorities will need to publish an action plan within 6 months of publication the Housing Delivery Test measurement.

### **Will an action plan require formal public consultation?**

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

### **How could the action plan be monitored?**

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



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## 8. Appendix 3: Standard Method Calculation

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The standard method (SM) as set out in the revised NPPF is used to calculate the boroughs housing need. The PPG provides more detail on the calculation<sup>31</sup>.

The standard method is as follows:

### **Step 1 – Setting the baseline**

Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive year, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded and individual cells need to be viewed in order to see the full number.

### **Step 2 – An adjustment to take account of affordability**

Then adjust the average annual projected household growth figure (as calculate in step 1) based on the affordability of the area.

The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used

No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

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<sup>31</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

### **Step 3 – Capping the level of any increase**

A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

Where these policies were adopted within the last 5 years (at the point making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

This also applies where the relevant strategic policies have been reviewed by the authority within the 5 year period and found to not require updating.

For areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy. For example, where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure in the spatial development strategy should be used.

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a) The projected household growth for the area over the 10 year period identified in step 1; or
- b) The average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists)

### **The council's position on the SM calculation**

As set out in responses to previous national consultations, EBC considers that the SM is fundamentally flawed, over simplistic and relies upon a limited range of datasets, that by themselves, do not provide a complete assessment of housing need within an individual local authority area or across the Housing Market Area (HMA).

The council considers that factors such as employment growth and other market signals such as land prices, rents, concealed households, and homelessness, as a more nuanced SM would more accurately reflect actual housing need.

# 9. Appendix 4: Borough Map of Green Belt

