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# Housing Delivery Test Action Plan 2024

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June 2024



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



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# 1.0 Introduction

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- 1.1 This Housing Delivery Test (HDT) Action Plan has been prepared by Elmbridge Borough Council (EBC) to provide an overview of housing delivery within the borough. This includes an analysis of housing delivery, barriers to delivery and actions necessary to increase the delivery of housing in the future.

## **Why is the Housing Delivery Test Action Plan being prepared?**

- 1.2 The HDT was introduced by government through the National Planning Policy Framework (NPPF) in July 2018 to monitor whether a local planning authority is building enough homes to meet its identified Local Housing Need (LHN). The HDT measures the number of homes built (completed) against the housing target for a plan making area over the previous three-year period. The 2022 HDT considers the number of homes delivered between 2019/20 and 2021/2. The results are based on a percentage score which is published annually by the Government. Local Planning Authorities (LPAs) are required to take appropriate actions where certain delivery target thresholds, as set out in the NPPF, are not met.
- 1.3 The results of the 2022 HDT showed that 1,474 new homes were delivered in the borough between 2019/20 and 2021/22, equating to 90% of the borough's housing target over the three-year period. As the 2022 HDT result is below 95%, the Council is required to prepare and publish an HDT Action Plan aimed at further increasing housing delivery in the borough before 19 June 2024 (within six months after the publication of the 2022 HDT results)<sup>1</sup>.
- 1.4 This Action Plan demonstrates the Council's continued commitment to positively responding to the challenge of boosting housing delivery in the borough. It analyses the reasons for the under delivery of new homes; reflects on the performance of the previous Action Plan; and includes new actions to improve housing delivery within the borough.

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<sup>1</sup> Planning Practice Guidance Paragraph: 052 Reference ID: 68-052-20190722

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## 2.0 Policy Context

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### National Planning Policy

- 2.1. The HDT was introduced by government through the NPPF in July 2018 to monitor whether a local planning authority is building enough homes to meet its identified LHN. The HDT is an annual measurement of housing delivery in the area of relevant plan-making authorities. It is a percentage measurement of the total net amount of housing delivered in a plan-making area over the preceding three financial years, against the number of homes required in that area over the same three-year period.
- 2.2. If housing delivery falls below the housing requirement in a plan-making area, as indicated by the HDT, policies set out in the NPPF<sup>2</sup> will apply to that plan-making area with immediate effect. Where the HDT result is:
- a) **where delivery falls below 95%** of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.
  - b) **where delivery falls below 85%** of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of the NPPF, in addition to the requirement for an action plan.
  - c) **where delivery falls below 75%** of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of the NPPF, in addition to the requirements for an action plan and 20% buffer.

### Local Planning Policy

- 2.3. The Elmbridge Core Strategy was adopted in 2011 and contains a housing target to deliver 3,375 net additional dwellings (225 per annum) over a period of fifteen years from 2011 to 2026. However, this target as set out in Core Strategy Policy CS2 is of-date only in terms of the Local Housing Need (LHN) figure referred to. The Core Strategy is more than five years old, and in accordance with the requirements in paragraph 77 and footnote 42 of the NPPF, the

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<sup>2</sup> Paragraphs 79 and 80 of the NPPF 2023

housing requirement falls to be determined by the LHN derived from the application of the Government’s standard method. The Council does not consider that the other elements of Policy CS2 are out-of-date. These remain consistent with the NPPF.

- 2.4. Since 2018 LHN has been calculated using the standard method set out in National Policy and the Planning Practice Guidance. Utilising the standard method, EBC’s local housing need in is currently 650 homes per annum.
- 2.5. EBC submitted its draft Local Plan to Secretary of State for Levelling-Up, Housing and Communities (DLUHC) on 10 August 2023. The draft Local Plan contains a housing requirement which averages 452 homes per annum between 2022-2039. Once the new Local Plan is adopted, the HDT housing requirement will be re-run using the new Local Plan housing requirement instead of the standard method assessment of local housing need<sup>3</sup>.

### Local Housing Need

- 2.6. The Council has a strong record of delivering housing above the Core Strategy housing target of 225 homes per annum. This is demonstrated in the Council’s Authority Monitoring Reports (AMR). Although the housing target is now considered out of date, since the adoption of the Core Strategy in 2011, there has only been one year (2012/13) where housing delivery fell below the Core Strategy’s annual housing target.

**Table 1: Annual Net Homes Completed**

| Monitoring Year | Homes Completed |
|-----------------|-----------------|
| 2011/12         | 264             |
| 2012/13         | 214             |
| 2013/14         | 477             |
| 2014/15         | 289             |
| 2015/16         | 242             |
| 2016/17         | 271             |
| 2017/18         | 231             |
| 2018/19         | 353             |
| 2019/20         | 396             |
| 2020/21         | 302             |
| 2021/22         | 768             |
| <b>Total</b>    | <b>3807</b>     |

<sup>3</sup> As set out in Paragraphs 17 to 18 of the Housing Delivery Test rule book.

- 2.7. The LHN for Elmbridge is calculated using the standard method consistent with paragraph 61 of the NPPF. In setting the LHN figure the standard method considers household growth projections and the affordability of the area, as well as applying a capped level of increase, where relevant. Using the calculation set out in the PPG<sup>4</sup> the annual LHN figure for Elmbridge is 650 homes. An explanation of how the LHN figure for Elmbridge has been calculated using the standard method can be found in Appendix 1.
- 2.8. Table 2 below shows how the borough's housing need figure has changed due to various methods of calculation (e.g. pre & post standard method) and how, since the publication of the standard method, the LHN has gradually increased due to changes in household projections and affordability ratios which sit behind the standard method.

**Table 2: Local Housing Need**

| Source  | Status                               | New homes per year |
|---|--------------------------------------|--------------------|
| <b>Pre standard method</b>  |                                      |                    |
| Core Strategy 2011  | Adopted Housing Target (out of date) | 225                |
| Kingston and North Surrey Strategic Housing Market Assessment (SHMA) 2016       | Local Housing Need Figure            | 474                |
| <b>Post standard method</b>   |                                      |                    |
| Local Housing Need Assessment (LHNA) 2020 calculated using the standard method. | Local Housing Need Figure            | 626                |
| Local Housing Need Assessment (LHNA) 2021 calculated using the standard method. | Local Housing Need Figure            | 641                |
| Local Housing Need Figure 2022 calculated using the standard method.            | Local Housing Need Figure            | 647                |

<sup>4</sup> PPG Paragraph:005 Reference ID: 2a-005-20190220

| Source   | Status                    | New homes per year |
|--|---------------------------|--------------------|
|  |                           |                    |
| Local Housing Need Figure 2023 calculated using the standard method. | Local Housing Need Figure | 650                |

- 2.9. It is important to note that the LHN figures identified both by the local evidence and the standard method do not produce a housing requirement figure. Once adopted, the housing requirement in the draft new Local Plan will be used.

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

- 2.10. The AMR 2022/2023 sets out the current housing land supply calculation and position. The council is currently unable to demonstrate a 5-year housing land supply against its LHN figure as per the requirement of national policy.
- 2.11. The council is committed to responding positively to the challenge of increasing the delivery of new homes and several evidence base studies have been undertaken to review the supply of future housing sites. These have been published on the Council's website. The housing trajectory will continue to be updated annually and published as part of the AMR.

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## 3.0 Housing Delivery Test Results

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- 3.1. The latest HDT results were published on 19 December 2023. The results of the 2022 HDT measurement revealed that housing delivery in Elmbridge was 90% of the housing required between 2019 and 2022. Table 3 shows the 2022 HDT result for EBC.

**Table 3: 2022 Housing Delivery Test Results**

| Area Name | Total number of homes required 2019 to 2022 | Total number of homes delivered 2019 to 2022 | Housing Delivery Test: 2022 measurement | Housing Delivery Test: 2021 consequence |
|-----------|---|--|---|---|
| Elmbridge | 1635  | 1474   | 90%                                     | Action plan                             |

- 3.2. As the 2022 HDT result is below 95%, EBC is required to prepare and publish a HDT Action Plan before the 19 June 2024.
- 3.3. With a return of 90%, the 2022 HDT shows a significant improvement in the number of homes delivered in the borough compared to previous years. This means that the presumption in favour of sustainable development, which has been in effect since 2020, no longer applies in the borough. In addition, the Council is no longer required to include a 20% buffer to its identified supply of specific deliverable sites as set out in paragraph 77 of the NPPF.

**Table 4: Annualised Housing Delivery Test number of homes required and delivered in Elmbridge**

| Monitoring Year | Number of Homes Required | Number of Homes Delivered | Difference |
|-----------------|--------------------------|---------------------------|------------|
| 2021/22         | 641                      | 768                       | +127       |
| 2020/21         | 421*                     | 302                       | -119       |
| 2019/20         | 573*                     | 396                       | -177       |
| 2018/19         | 623                      | 353                       | -270       |
| 2017/18         | 443                      | 231                       | -212       |
| 2016/17         | 355                      | 267                       | -88        |
| 2015/16         | 225                      | 240                       | -15        |

*\*The government reduced the 'homes required' within the 2019 to 2020 year by a month and within the 2020 and 2021 year by 4 months in the Housing Delivery Test due to the national lockdown which saw temporary disruption to local authority planning services and the construction sector. This is reflected in the 2022 results.*

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## 4.0 Housing Delivery Analysis

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- 4.1 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 a Local Authority.
- 4.2 This section examines the potential causes of the 'under delivery' of new homes in the borough and identifies the local and national issues which influence housing delivery. This analysis will be used to inform what actions the Council needs to take to improve its housing delivery in the action plan in section 5.

### **What are the causes of under delivery in the borough?**

- Limited land supply and land availability.
- Over delivery of large, 4 bedroom plus detached dwellings.
- Small sites unable to supply a mix of housing units required.
- Low density development/ character of the area.
- Site specific issues
- High Land Values

### **Other issues to consider:**

- Decision-making performance
- Borough-wide infrastructure

### **What are the causes of under delivery in the borough?**

#### **Limited land supply and land availability**

- 4.3 One of the key issues affecting the delivery of new homes is that the borough's limited land supply. Elmbridge is embedded in the Metropolitan Green Belt which permeates 57% of the borough<sup>5</sup> and 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.

- 4.4 Land in the borough also has a high nature conservation value and some areas

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<sup>5</sup> See Appendix 2 for Borough Map of the Metropolitan Green Belt.

have designations of international importance. For example, there are three Sites of Special Scientific Interest (SSSI) located within Elmbridge<sup>6</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 also historic landscapes at Claremont, Painshill and Oatlands Park. Together this means the borough has a high-quality landscape with significant landmarks. The presence of these characteristics results in limited development opportunities for delivering new housing on a large scale.

- 4.5 The Council has already carried out several evidence base studies looking at availability and supply of sites for delivering new homes. The Review of the Absolute Constraints (2016 and updated 2019)<sup>7</sup> identified where development should be restricted as the harm could not be mitigated and it concluded that the supply of suitable land is limited by national constraints.
- 4.6 To identify the extent of deliverable and developable land for housing, employment and retail development, a Land Availability Assessment (LAA) is produced annually. This assessment provides information needed for the 5-year land supply calculation and the housing trajectory which are published in the AMR as well as forming the housing target for the new Local Plan.
- 4.7 It identifies the number of sites where new homes could be delivered in the urban area. The sites identified to deliver new homes consisted of a combination of sites under construction, those with planning permission that have not yet been implemented, new homes on opportunity sites, and homes on windfall sites<sup>8</sup>.

#### **Over delivery of large, 4 bedroom plus detached dwellings.**

- 4.8 The over delivery of large, detached dwellings being built in the borough has a direct impact on the number of new smaller homes being delivered. The Local Housing Needs Assessment (LHNA) (2020) provides the current published source of information regarding the size, type and tenure of homes needed in

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<sup>6</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.

<sup>7</sup> Review of Absolute Constraints ([2016](#) and [updated 2019](#)),

<sup>8</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. This is explained in full in the published [Land Availability Assessments](#)

the borough. It concluded that there is a need for smaller homes for market housing. Table 5 below sets out the number of bedrooms required to meet identified need.

**Table 5: Mix of housing need based on the LHNA 2020**

| Number of Beds | Percentage need for Market Housing |
|----------------|------------------------------------|
| 1 bed          | 20%                                |
| 2 bed          | 50%                                |
| 3 bed          | 20%                                |
| 4 bed          | 10%                                |

- 4.9 Past AMR data has demonstrated that the delivery of new homes consisting of 4 bedrooms or more has achieved significantly greater than 10% identified in the LHNA (2020). This has resulted in a continued oversupply of larger homes failing to contribute to local housing needs.
- 4.10 To increase the delivery of the type of homes needed locally and to ensure the appropriate optimisation of development land, the Council 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.
- 4.11 The AMR 2022/23 reported 18% completed 4+ bed units, which is above the percentage need (see Table 6).

**Table 6: Comparison of gross delivery of housing units over a 4-year period**

| Years          | 1 bed     | 2 bed     | 3 bed    | 4+ bed    | Total (gross numbers) |
|----------------|-----------|-----------|----------|-----------|-----------------------|
| <b>2019/20</b> | 129 (27%) | 175 (36%) | 85 (18%) | 93 (19%)  | 482 (100%)            |
| <b>2020/21</b> | 65 (17%)  | 138 (37%) | 57 (15%) | 112 (30%) | 372 (100%)            |
| <b>2021/22</b> | 292 (35%) | 366 (44%) | 89 (10%) | 79 (9.5%) | 826 (100%)            |
| <b>2022/23</b> | 92 (31%)  | 85 (29%)  | 66 (22%) | 53 (18%)  | 296 (100%)            |

## Small sites

- 4.12 The LAA highlights that there are 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 the LAA 2023 shows that a significant proportion of sites are less than 0.5 hectares in size. In the future, it is expected that small sites will continue to be a significant source of housing delivery as evidenced through the LAA.
- 4.13 Draft Local Plan policies HOU2 and HOU3 seek to ensure development makes efficient use of land and to optimise sites within the urban area of the borough. This includes focusing development within sustainable locations and delivering additional homes via infill and backland developments, promoting mixed use schemes and increased building heights. This will help deliver more homes on the borough's smaller sites.

## Low density development/character of the area

- 4.14 Elmbridge is characterised by low density development. This is particularly obvious in areas such as the 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.
- 4.15 The AMR analyses the average density achieved across the borough, it is important to note that the AMR monitors completions and not, granted planning permissions. The last monitoring year saw an increase due to a small site. This was largely driven by higher density completions in Esher, East and West Molesey, Hersham and Thames Ditton, Long Ditton, Hinchley Wood and Weston Green.

**Table 7: Borough wide average density**

| Years   | Borough wide average density |
|---------|------------------------------|
| 2013/14 | 58                           |
| 2014/15 | 43                           |
| 2015/16 | 57                           |
| 2016/17 | 57.81                        |
| 2017/18 | 33.24                        |
| 2018/19 | 46.77                        |
| 2019/20 | 39.21                        |
| 2020/21 | 38.7                         |
| 2021/22 | 39.6                         |
| 2022/23 | 75.1                         |

- 4.16 Advice note [Development Management Advice Note 2: Optimising Development Land](#) was produced to applicants and their agents when considering proposals for new homes in Elmbridge during the preparation of the new Local Plan. The note focuses on the need to optimise development land in the Borough and the Council's approach to ensuring the optimisation of development land when assessing development proposals. This approach is supported by NPPF paragraph 129 that states, 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.
- 4.17 The draft Local Plan includes policy HOU2 which states that developments must make efficient use of land and optimise sites within the urban area of the borough (point 1 of the policy). Point 2 of the policy states that sites within or on the edge of town, district and local centres and sites adjacent to train stations will deliver additional homes. In addition, the previously designated Special Low-Density Areas have not been retained in the draft Local Plan.
- 4.18 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.

### **Site Specific Issues**

- 4.19 There are a variety of issues which effect specific sites causing slower rates of homebuilding. These include:
- Complex landownership with multiple land parcels
  - Viability and planning obligations
  - Sites relying on other developments to come forward
  - Site constraints (planning designations such as Green Belt and green space, flood risk etc.)
  - Land contamination
  - Access to/from the site
  - Legal issues (e.g. lease arrangements, covenants, rights to light)

### **Landowner / Developers' Circumstances**

- 4.20 Individual circumstances of the landowners and developers impact the speed at which sites get built out. Issues that create barriers to homes being built are:
- Business model of the landowner – whether or not they intend to build

themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission.

- Access to finance and cost of interest payments.
- Land value expectations.
- Extent of the freeholder / leaseholder motivation to develop the site.

4.21 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 land banking however, the Council is aware of the increase in cost of building materials which is impacting the development industry.

### **High Land Values**

4.22 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.

4.23 The council has always sought to maximise affordable housing provision and continues to apply Core Strategy Policy CS21 Affordable Housing on a case-by-case basis. The updated [Statement on Affordable Housing Provision on Small Sites](#) published October 2021 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 (CIL) rates.

4.24 The council has introduced a 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. A new viability assessment has also been published to support the draft 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.

## Other issues to consider

### Decision-making performance

- 4.25 The performance of decision making in the council's Planning Services is not considered to be a barrier to delivering new homes. Overall, planning applications are being processed within the statutory timeframes. The AMR 2022/23 reported 87% of major planning applications were processed within the statutory 13-week period. This is above the council's target of 83%, and the national target of 60%. For minor applications, where the statutory time period to process an application is 8 weeks, 83% were processed within this timeframe, exceeding both the council's target of 83% and the national target of 65%. On these statistics the processing of planning applications is not preventing the granting of planning permission and in turn the delivery of new homes.
- 4.26 On those sites where planning permission is refused, the council's performance is good (see Table 8). During 2022/23, 62% 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 8: Appeals allowed and dismissed 2022/23**

|                                      | <b>Appeals Allowed</b> | <b>Appeals Dismissed</b> |
|--------------------------------------|------------------------|--------------------------|
| <b>April to June 2022 (Q1)</b>       | 34%                    | 66%                      |
| <b>July to September 2022 (Q2)</b>   | 40%                    | 60%                      |
| <b>October to December 2022 (Q3)</b> | 35%                    | 65%                      |
| <b>January to March 2023 (Q4)</b>    | 42%                    | 58%                      |
| <b>2022/23</b>                       | <b>37.8%</b>           | <b>62.2%</b>             |

### Borough-wide infrastructure

- 4.27 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.

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## 5.0 Action Plan

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### How the Council is supporting housing delivery

- 5.1 The Council is fully committed to working proactively and is utilising the full range of tools and processes at its disposal to boost the delivery of new homes. It is acknowledged that housing delivery 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.
- 5.2 The HDT results demonstrate that the Council has improved the delivery of housing in the borough compared with previous HDT results. The wider local and national barriers to delivering new homes have not significantly changed since the publication of the previous 2020 Action Plan.
- 5.3 The Council engages with developers, agents and site promoters to monitor build out rates, obtain information on barriers to delivering new homes and market conditions.
- 5.4 The Council will continue to collaborate with registered providers and housing companies to deliver affordable homes. There has been ongoing commitment to deliver affordable housing, which is explained in the Housing, [Homelessness & Rough Sleeping Strategy](#), to support the delivery of at least 300 affordable homes between April 2020 and March 2024.
- 5.5 The revision of the pre-application advice service implemented in 2020 has helped to speed up the delivery of new homes. 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. This has been working well.
- 5.6 The Council has also started to use Planning Performance Agreements (PPAs) for major development schemes at pre-applications and planning applications 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.

- 5.7 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 2020 Action Plan, the Local Plan has progressed to submission and the Examination in Public has started.
- 5.8 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 has the Council done so far?

- 5.9 The tables below provide a summary of what the Council has done to achieve previous actions and what it needs to do to continue this and deliver the housing we need. Many of these actions have been carried out across the Council’s Planning, Housing and Asset Management and Property services.

### Progress from the actions published in the HDT 2020

Table 1: Action Plan 2020 - Local Plan progress

| Actions – Taken from the ‘What more can the Council do’ section of the HDT Action Plan 2020  | Department Responsible | Delivery Date                | Progress  |
|--|------------------------|------------------------------|---|
| <ul style="list-style-type: none"> <li>Through the Local Plan preparation, the council will respond positively to 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</li> </ul> | Planning Services      | August 2023 (Plan submitted) | <p>On the 10 August 2023, the draft Local Plan 2037 was submitted to the Planning Inspectorate and the Examination in Public has started.</p> <p>The plan contains policies for meeting the housing need and a growth strategy that responds positively to the housing challenge.</p> |

| Actions – Taken from the ‘What more can the Council do’ section of the HDT Action Plan 2020  | Department Responsible   | Delivery Date                           | Progress  |
|--|--------------------------|---|---|
| <p>Development’ priority to publish the draft Local Plan and submit it to the Planning Inspectorate for Examination.</p>   |                          |   | <p>The plan is supported by the <a href="#">Council’s 2030 Vision document</a>. One of its key goals is that ‘Our Local Plan will be in place, outlining our commitments for how the communities and places in the borough will develop’.</p>   |
| <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> | <p>Planning Services</p> | <p>August 2023 (Evidence submitted)</p> | <p>On the 10 August 2023, the draft Local Plan 2037 was submitted to the Planning Inspectorate for Examination.</p> <p>Submission documents include the Duty to Cooperate Statement of Compliance, the Duty to Cooperate Scoping Statement and Statements of Common Ground with neighbouring authorities.</p> |
| <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>  | <p>Planning Services</p> | <p>Annually</p>                         | <p>Land Availability Assessments have been updated on an annual basis and since the last HDT Action Plan, three LAA documents have been published.</p> <ul style="list-style-type: none"> <li><a href="#">LAA 2021</a></li> <li><a href="#">LAA 2022</a></li> <li><a href="#">LAA 2023</a></li> </ul>         |

| Actions – Taken from the ‘What more can the Council do’ section of the HDT Action Plan 2020   | Department Responsible | Delivery Date                | Progress   |
|---|------------------------|------------------------------|--|
|   |                        |                              | The LAA 2022 informed the draft Local Plan site allocations chapter and housing target for Strategic policy SS3 and Housing policy HOU1.   |
| <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      | June 2022                    | The Viability Assessment 2022 was published at the Regulation 19 representation period in June 2022. This evidence informs the draft Local Plan policies including affordable housing.   |
| <ul style="list-style-type: none"> <li>Review maximum density standards within the current low-density designated areas</li> </ul>  | Planning Services      | August 2023 (Plan submitted) | <p>The Special Low-Density designation is not included in the draft Local Plan.</p> <p>Draft Local Plan policy HOU2: Optimisation of sites states that development must make efficient use of land and optimise sites within the urban area.</p> |

**Table 2: Action Plan 2020 - Improving Decision Making**

| Action  | Department Responsible | Delivery Date | Progress  |
|---|------------------------|---------------|---|
| <ul style="list-style-type: none"> <li>Review and update the Development Contributions Supplementary Planning Document (SPD).</li> </ul>  | Planning Services      | April 2021    | This was reviewed and updated, and the revised SPD was adopted by the Council in April 2021.  |
| <ul style="list-style-type: none"> <li>Review the standard conditions list for planning applications.</li> </ul>  | Planning Services      | Ongoing       | This has worked well and has prevented delays by avoiding pre-commencement conditions being sought.   |
| <ul style="list-style-type: none"> <li>Continue to reduce the number of applications determined after the statutory deadline.</li> </ul>  | Planning Services      | Ongoing       | Two new Development Management and two new Business Support Team posts have been agreed in 2024 which will enlarge the department and ensure applications are being validated & determined within the statutory deadline. |
| <ul style="list-style-type: none"> <li>Continue to determine applications in accordance with current National and Local targets.</li> </ul>   | Planning Services      | Ongoing       | This continues and is reported annually in the Authority Monitoring Report.   |
| <ul style="list-style-type: none"> <li>Continue to develop and offer a proactive <a href="#">pre-application service</a> to support the delivery of sustainable development.</li> </ul> | Planning Services      | Ongoing       | The pre-application service continues to be offered and provides a pro-active service which prevents delays to delivery.  |

**Table 3: Action Plan 2020 - 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                      | Ongoing            | <p>A developer forum takes place annually and allows a dialogue with developers.</p> <p>Landowners of urban sites in the LAA have been contacted in 2023 to confirm timescale to delivery.</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 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.</li> </ul> | Asset Management and Property Services | Ongoing            | <p>Work is progressing on a number of publicly owned sites across the borough including the Esher town centre vision, Elm Grove and Lower Green Regeneration Project</p> <p>An Asset Strategy Review is also underway which will balance operational, strategic and commercial outcomes.</p> <p>These projects are supported corporately and featured in the <a href="#">Council's 2030 Vision document</a>.</p> |
| <ul style="list-style-type: none"> <li>To adopt a reviewed CIL Levy Charging</li> </ul>   | Planning Services                      | Autumn 2024 (Local | Ongoing. The LDS 2023-2026 has   |

|   |                   |                               |  |
|---|-------------------|-------------------------------|--|
| Schedule to support the Local Plan  |                   | Development Scheme 2023-2026) | timetabled this to be adopted in Autumn 2024.  |
| <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 | Annually                      | Annual funding statements have been written since 2019-2020 and are available to view on the <a href="#">Community Infrastructure Levy (CIL) webpage</a> .                         |
| <ul style="list-style-type: none"> <li>Local CIL project allocations made in June/ July by Local Spending Boards, and Strategic CIL project allocations considered by June/July by the Strategic CIL Working Group.</li> </ul>      | Planning Services | Annually                      | This happens on an annual basis and provides communities the opportunity to spend local CIL funds to enable community projects to be funded from development that has taken place. |
| <ul style="list-style-type: none"> <li>Review and update the Infrastructure Delivery Plan.</li> </ul>   | Planning Services | May 2022 (updated July 2023)  | An updated IDP was published alongside the draft Local Plan for regulation 19 in May 2022 and was updated in July 2023.  |

**Table 4: Action Plan 2020 - Support Affordable Housing**

| <b>Action</b>  | <b>Department Responsible</b>                               | <b>Delivery date</b>                        | <b>Progress</b>   |
|--|---|---|---|
| <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</li> </ul>                          | Housing Services and Asset Management and Property Services | March 2021 (Elmbridge Council Plan 2020/21) | Although the housing company no longer exists, other funding streams are being considered to ensure more affordable homes can be delivered. |
| <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</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                                  | Work is ongoing to provide more affordable homes, however the target has been met.  |

## What more can the Council do?

**Table 5: Action Plan 2024 - Proposed actions across all departments**

| Action  | Department Responsible                 | Delivery Date |
|---|--|---------------|
| ✓ Adopt the Local Plan which means the growth strategy, housing policies and site allocations can be implemented ensuring the delivery of homes in the borough for the next 15 years. | Planning Services                      | 2025          |
| ✓ Contacted all applicants, agents and developers who have an unimplemented planning permission to find out if there are any issues preventing the delivery of housing.               | Planning Services                      | 2025          |
| ✓ Complete an annual Land Availability Assessment making sure all sites for housing are identified.   | Planning Service                       | 2025          |
| ✓ Update the Brownfield Land Register   | Planning Services                      | Annually      |
| ✓ Maintain the self-build and custom build register   | Planning Services                      | Ongoing       |
| ✓ Progress the property and placemaking delivery strategy to identify land in public ownership and future development plans.  | Asset Management and Property Services | Ongoing       |
| ✓ Deliver an annual Members' (Councillors) training programme to assist Members making sound planning decisions.  | Planning Services                      | Annually      |
| ✓ Continue to host Developers forum and find out what barriers there are to housing delivery.   | Planning Services                      | Annually      |
| ✓ Develop and implement a new Housing & Homelessness strategy to address the housing challenges our community faces   | Housing                                | 2025          |
| ✓ Use the Housing enabling fund to increase homes in Elmbridge  | Housing                                | Ongoing       |

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# Appendix 1: The Housing Need Calculation

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The standard method to calculating local housing need is set out in the PPG on [housing and economic needs assessments](#). The standard method uses a formula to identify the minimum number of new homes expected to be planned for over a 10-year period. In accordance with the NPPF requiring strategic policies to look ahead over a minimum 15-year period from adoption, guidance in the PPG states that the annual number, based on a 10-year baseline, can be applied to the whole plan period.

The four steps of the standard method calculation are:

- Step 1 – Setting the baseline
- Step 2 – An adjustment to take account of affordability
- Step 3 – Capping the level of any increase
- Step 4 – Cities and urban centres uplift

## 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.

Estimated households in Elmbridge in:

2023=57,268

2033=61,914

Projected household growth calculation:  $61,914 - 57,268 = 4,646$  growth over a 10-year period

Projected annual growth = **464.6** ( $4,646 / 10$ )

## 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:

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

Elmbridge affordability ratio = 20.04 (2022)

Adjustment factors calculation:  $20.04 - 4 = 16.04 / 4 = 4.01 \times 0.25 = 1.0025 + 1 = 2.00$

The adjustment factor is therefore 2.00 and is used as follows:

Minimum annual local housing need figure = (adjustment factor) x projected household growth

Minimum annual local housing need figure =  $2.00 \times 464.6$

The resulting figure is **929.2** (uncapped local housing need)

## 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 local housing need figure is capped at 40% above the average annual housing requirement figure (Step 1) (464.6)

$$\text{Cap} = 464.6 + (40\% \times 464.6) = 464.6 + 185.84 = 650.44$$

The annual local housing need in Elmbridge is therefore **650 dwellings per annum**.

#### **Step 4 - Cities and urban centres uplift**

Elmbridge is not on the list of cities and urban centres, therefore an 35% uplift does not apply.

# Appendix 2: Borough map of the Green Belt

