
Housing Delivery Action Plan

February 2019



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



Contents

1	Introduction	1
2	Planning Policy Context	2
3	Housing Delivery Analysis.....	5
4	The Action Plan.....	18
5	Next Steps	28
	Appendix 1: National Planning Policy Framework	29
	Appendix 2: Planning Practice Guidance	31
	Appendix 3: Standard Method Calculation	33
	Appendix 4: Borough Map of Green Belt.....	35

1 Introduction

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-2020s¹. This objective to increase the number of new homes is reflected in the revised National Planning Policy Framework (NPPF) (July 2018) and the introduction of the Housing Delivery Test.

1.2 The Housing Delivery Test Result for Elmbridge Borough Council was published by the Secretary of State on 19 February 2019. Elmbridge Borough Council scored 62%² and in response to this, the Council has produced a Housing Delivery Action Plan³. By preparing an Action Plan, the Council is positively responding to the challenge of increasing its housing delivery. The Action Plan analyses the reasons for the under-delivery of new homes and sets out actions to improve housing delivery within the Borough. The Housing Delivery Action Plan was approved by Individual Cabinet Member Decision Making (ICMDM) on the 18 March 2019.

¹ Technical consultation on updates to national planning policy and guidance <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

² Housing Delivery Test: 2018 Measurement <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

³ As part of the preparation of the Housing Delivery Action Plan, the Council participated in the Planning Advisory Service Pilot Study.

2 Planning Policy Context

The Housing White Paper

2.1 In response to the national housing crisis, the Government published the Housing White Paper (HWP) 'Fixing our broken 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.⁴ 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 Housing Delivery Test. 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 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, 2017⁵. 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 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 types of housing needed in their area.

National Policy Context

2.4 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 by publishing a revised National Planning Policy Framework (NPPF) (July 2018)⁶, the Housing Delivery Test Measurement Rule Book (July 2018), updated Planning Practice Guidance (PPG) (September 2018) and the Housing Delivery Test: 2018 Measurement Technical note (February 2019).

2.5 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book⁷. It measures the number of net homes delivered against the number of homes required over a rolling three year period.⁸

⁴ Department for Communities and Local Government, Fixing our broken housing market, Introduction, Page 9, <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

⁵ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

⁸ 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.

2.6 The formula for the Housing Delivery Test Calculation is as follows:

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

2.7 The Council scored 62% in the Housing Delivery Test. This result means the Council is required to produce an Action Plan as per the requirements of the NPPF⁹. 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 Planning Practice Guidance on the action plan¹⁰.

2.8 The NPPF requires local planning authorities to demonstrate a 5-year supply of deliverable housing land plus a buffer depending on the circumstances the local authority falls within. The Housing Delivery Test result means Elmbridge is required to add a 20% buffer to improve the prospect of achieving the planned supply¹¹.

Local Planning Policy

2.9 The Elmbridge Core Strategy was adopted in 2011 prior to the publication of the NPPF in 2012 and has a housing target of 225 new homes per year. In 2015, the Development Management Plan was adopted. The NPPF introduced major policy changes and the Council began the process of producing a new Local Plan to replace the Core Strategy.

2.10 The Council needs to produce a new Local Plan as the need for new homes according to the Government's formula is significantly higher than our current housing target and it is clear that any uplift in need, can not 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 corporate priority for the Council.

2.11 The Council carried out a Regulation 18, Strategic Options Consultation at the end of 2016. In response to the Strategic Options consultation, the Planning Policy Team have been further developing the Local Plan evidence base and undertaking a number of additional evidence base studies. An updated Local Plan timetable (see Table 1 below) was published in the Local Development Scheme on 30 October 2018¹². A further Regulation 18 Local Plan consultation will take place in 2019.

⁹ NPPF paragraph 75, <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

¹⁰ Planning Practice Guidance on Housing Delivery Test, <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#housing-delivery-test>

¹¹ NPPF paragraph 73, Footnote 30, <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

¹² Local Development Scheme, October 2018, <https://www.elmbridge.gov.uk/planning/local-plan/>

Table 1: Summary of key milestones in Local Plan process				
Consultation Stage	Consultation period	Submission	Examination	Adoption
'Preferred Options' (Regulation 18 August/September 2019)	6 weeks	March 2020	July- September 2020	January 2021
'Draft Plan' (Regulation 19) January/ February 2020	6 weeks			

3 Housing Delivery Analysis

3.1 This section looks at 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 have been used to inform what actions the Council need to take to improve its housing delivery.

3.2 Building houses is often a complex process, there maybe 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 Statement¹³. The high demand for new homes and a constrained land supply is a shared characteristic across neighbouring authorities and those within the housing market area¹⁴.

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 Council is currently preparing an updated Infrastructure Delivery Plan (IDP) which will set out all of the infrastructure required to deliver the 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 concerns over the existing Highways Network and the impact of future housing growth, therefore the Council is progressing with a Highways Assessment which will highlight any strategic problems and provide mitigation.

3.5 The Council fed into the Surrey wide Infrastructure Study (2017) which identifies the necessary Surrey wide strategic infrastructure to support growth planned in Surrey to 2031. It highlights the scale of investment required to provide this infrastructure.

3.6 Outside of the borough, there are several major transport infrastructure projects being proposed. One of these is Heathrow Airport expansion¹⁵ and a proposal for new railway infrastructure¹⁶. The other is the Crossrail 2 proposal to improve rail connectivity from

¹³ <https://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

¹⁴ Housing market area partners: Epsom & Ewell Borough Council, Mole Valley District Council and the Royal Borough of Kingston upon Thames.

¹⁵ This received government backing in June 2018. <https://www.heathrowexpansion.com/press/mps-say-yes-to-heathrow-expansion-as-parliament-vote-passes-airports-national-policy-statement/>

¹⁶ A proposed new railway route would improve access to Heathrow from Surrey. New railway infrastructure could be built even if airport expansion doesn't progress and could potentially be running by 2027. Heathrow Southern Railway - <https://heathrowrail.com/>

central London to Surrey¹⁷. It is considered these major infrastructure proposals are unlikely to lead to a significant increase in the delivery of new homes because of the Borough's limited land supply.

Increased Housing Need

3.7 The need for housing¹⁸ has increased significantly since the adoption of the Core Strategy. The Council's local housing need figure is 623 homes per year. This is calculated using the standard method as per the NPPF requirement (see Appendix 3 for an explanation of the calculation).

3.8 Prior to this, the Council's own evidence, the Kingston and North Surrey Strategic Housing Market Assessment (SHMA) (2016), identified a housing need figure of 474 homes per year.

Source	Status	New Homes Per Year
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
Local Housing Need Figure (as of 19 February 2019) calculated using the standard method ¹⁹	Local Housing Need Figure	623

3.9 The significant increase in the need for new homes 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 address this.

Local Housing Performance

3.10 It is important to note that 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 monitored housing delivery against the Core Strategy housing target. In 2017-2018²⁰, there were 231 net additional dwellings completed²¹. The 2017-2018 AMR

¹⁷ It is expected that this will drive the development of 200,000 new homes across the region. Crossrail 2 stations are being proposed at Thames Ditton and Hampton Court stations however these are located within the Green Belt. <http://crossrail2.co.uk/discover/new-homes/>

¹⁸ Assessing housing need is the first step in the process of deciding how many homes need to be planned for. Housing need is an unconstrained assessment of the number of homes needed in an area. PPG, Paragraph: 001 Reference ID: 2a-001-20180913, <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁹ Planning Practice Guidance on Housing and economic needs assessment. Updated on 20th February 2019, <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

²⁰ AMR 2017-2018, <http://www.elmbridge.gov.uk/planning/local-plan/>

²¹ Net additional dwellings is defined as a measure of the net change in dwelling stock between 1st April and 31st March of the following year. The net change comprises the number of new house building completions plus any gains or losses through conversions, changes of use and demolitions

recorded 75% of all new homes were built on brownfield land whilst 16% were built on greenfield land²².

3.11 The annual net additional²³ homes completed since 2004 are shown in Table 3 below²⁴. Since 2004, the average number of new homes delivered each year is 327. There was a high of 718 addition homes completed in 2007-2008. This reflects the completion of some larger housing sites in the borough. Whilst in 2009-2010 there was a low of 201 net addition homes completed.

Monitoring Year	Additional Homes Completed
2004/05	336
2005/06	362
2006/07	450
2007/08	718
2008/09	327
2009/10	201
2010/11	355
2011/12	300
2012/13	264
2013/14	257
2014/15	273
2015/16	240
2016/17	267
2018/19	231

3.12 Despite a successful record of delivering above the Core Strategy housing target, future AMRs will monitor housing delivery against the local housing need figure which will indicate an under performance in housing delivery.

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 and high-quality environment mean that this pressure is reflected locally. In fact, the high house prices and for new homes is more reflective of London than the rest of Surrey. The average house price in the Borough is now in the region of £759,000²⁶.

3.14 As set out in Table 4, the Borough had the 9th highest average (mean) house price across the entirety of England in 2016/17, with the 8 other Local Authority areas all being in London. This results in the Borough having one of the worst levels of affordability in the country coupled with an under supply of affordable homes.

²² AMR 2017-2018, page 15, <http://www.elmbridge.gov.uk/planning/local-plan/>,

²³ Net additional dwellings means the number of new dwellings being created minus any existing dwellings lost through demolition for example.

²⁴ AMR 2017-2018, page 14, <http://www.elmbridge.gov.uk/planning/local-plan/>

²⁵ AMR 2016-2017, <http://www.elmbridge.gov.uk/planning/local-plan/> paragraph 4.5, page 27

²⁶ Statement on Affordable Housing Provision on Small Sites (November 2018) <http://www.elmbridge.gov.uk/planning/local-plan/>

Table 4: Highest average mean house price across the entirety of England in 2016/17 (National Housing Federation Home Truths)²⁷

Ranking	Local Authority	Region	Average (mean) house price	Mean annual earnings in 2017	Ratio of house prices to incomes	Income required for 80% mortgage (80% at 3.5x)
1	Kensington & Chelsea	London	£1,983,779	£70,496	28.1	£435,435
2	Westminster	London	£1,610,474	£55,266	29.1	£368,109
3	Camden	London	£1,027,351	£42,552	24.1	£234,823
4	Hammersmith & Fulham	London	£937,157	£43,347	21.6	£214,207
5	City of London	London	£933,478	£57,689	16.2	£213,366
6	Wandsworth	London	£788,501	£44,658	17.7	£180,229
7	Richmond upon Thames	London	£781,260	£47,970	16.3	£178,574
8	Islington	London	£760,315	£42,916	17.7	£173,786
9	Elmbridge	S. East	£759,635	£40,461	18.8	£173,631

3.15 The average annual mean income in Elmbridge is well above the national average, in 2017 it was £40,461, however the level of average income required to purchase a new home is double that required in England. As a result of high average mean house prices, the National Housing Federation has identified that the ratio of house prices to income is 18.8. This is on par with the levels experienced in London. 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. There is pressure on the Council to develop its own land for housing. Affordability is therefore a significant issue in the Borough and this is reflected in local housing need.

Affordable Housing Delivery

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

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 others 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

²⁷ National Housing Federation – Home Truths 2017/18 - <https://www.housing.org.uk/resource-library/home-truths/>

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 residential schemes are coming to the end of their viable economic life. Opportunities may arise for redevelopment, potentially with higher densities of housing, but only where this is 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 the Council's 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 expects housing association development 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 selling off their assets in the Borough to realise a housing gain elsewhere, at a later date through cross-subsidy, which is of no gain to those in housing need locally. The high cost of land locally, combined with a limited land supply, means an extra challenge for housing associations 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 only a limited number of additional affordable housing units. This affordable housing is complemented by housing associations effectively re-developing their own sites.

3.24 During 2017-18, the AMR recorded that 73 new affordable housing units were delivered²⁸, this is a marked increase compared to the previous year, where only 4 new affordable units were completed²⁹. However, the delivery of affordable housing remains a critical issue.

3.25 Elmbridge Core Strategy Policy CS21 requires a contribution towards affordable housing from all developments where there is a net increase in dwellings³⁰, this includes affordable housing contributions from small sites (fewer than 10 units). The Council's Statement on Affordable Housing Provision on Small Sites (November 2018)³¹ sets out the Council's policy approach and supporting evidence on requiring affordable housing contributions from small sites.

²⁸ AMR, 2017-2018, <http://www.elmbridge.gov.uk/planning/local-plan/>

²⁹ AMR 2016-2017, paragraph 5.2, page 43, <http://www.elmbridge.gov.uk/planning/local-plan/>

³⁰ Core Strategy Policy CS21 Affordable Housing, <http://www.elmbridge.gov.uk/planning/local-plan/>

³¹ Statement on Affordable Housing Provision on Small Sites (November 2018)
<http://www.elmbridge.gov.uk/planning/local-plan/>

Housing Mix

3.26 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 trend for the delivery of large new homes in the Borough continues and has increased from the previous monitoring years. In 2017-2018, the AMR reported that 46% of gross new homes completed had 4 or more bedrooms³², in the previous year it was 30%. 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.

3.27 The SHMA (2016) provides an up to date 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 new homes. Table 5 below sets out the number of bedrooms required to meet identified need. It also identified an acute need for affordable housing (primarily social rented tenure).

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

3.28 The AMR data demonstrates that the delivery of new homes consisting of 4 bedrooms or more has already achieved over the 1% identified in the SHMA (2016). The continued oversupply of larger homes will worsen affordability issues and does not positively contribute towards meeting local housing need.

3.29 In order to tackle this issue, the Council has published online the Development Management Advice Note 1: Understanding Housing Need³⁴. Using existing policies set out in the Core Strategy and Development Management Plan, it explains to developers, planning agents and applicants about the type and size of homes needed.

Housing Land Supply

3.30 One of the key issues affecting the delivery of new homes is the characteristics of the Borough's land supply and as a consequence it means the available land supply is severely limited. The Borough is embedded in the Metropolitan Green Belt. It permeates all parts of the Borough with 57% of the Borough designated as Metropolitan Green Belt³⁵. Green Belt has the highest policy protection and is identified as a constraint for development in the NPPF. The NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances through the plan making process.

3.31 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

³² AMR 2017-2018, page 14, <http://www.elmbridge.gov.uk/planning/local-plan/>

³³ AMR 2016-2017, paragraph 4.11, page 30, <http://www.elmbridge.gov.uk/planning/local-plan/>

³⁴ Development Management Advice Note 1: Understanding Housing Need
<https://www.elmbridge.gov.uk/planning/a-guide-to-planning-policy/>

³⁵ See Appendix 4 for Borough Map of the Metropolitan Green Belt.

(SSSIs) located within the Borough³⁶. 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 and strategic views. The presence of these landscape characteristics results in limited development opportunities for delivering new housing on a large scale.

3.32 The Council has already carried out a number of evidence base studies looking at availability and supply of sites for delivering new homes. The Review of the Absolute Constraints (2016)³⁷ identified where development should be restricted³⁸ and concluded that the land available for potential development is limited and that only a small number of parcels were not affected by Absolute Constraints.

Small Sites

3.33 To identify the extent of land for housing, employment and retail development a Land Availability Assessment (LAA) (2016)³⁹ was prepared as part of the Local Plan preparations utilising the existing spatial strategy. It identified the number of new homes that could be delivered in the urban areas. 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 sites⁴⁰. The LAA highlighted that there were limited large sites available for delivering new homes and that the supply consisted of mainly small sites.

3.34 Small sites therefore have a significant role to play in the delivery of new homes. The analysis of planning permissions granted demonstrates that the majority of development taking place is on sites of less than 0.50 hectares and that the average development site in the Borough is 0.11 hectares. Table 6 below shows that during the period of 1 August 2011 to 31 July 2018, 94% planning applications granted planning permission were for developments of fewer than 10 gross units which equated to 546 applications out of a total of 580⁴¹. In the future, small sites will continue to deliver the majority of new development in the Borough as evidenced through the LAA (2016) and the emerging 2018 version.

³⁶ 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.

³⁷ Review of Absolute Constraints (2016), <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

³⁸ Based on NPPF footnote 6 for paragraphs 175 and 176.

³⁹ LAA (2016), <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

⁴⁰ 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.

⁴¹ Statement on Affordable Housing Provision on Small Sites (November 2018)
<http://www.elmbridge.gov.uk/planning/local-plan/>

Scheme size – proposed units	Fewer than 10 units (gross)		Applications granted planning permission with fewer than 10 gross units		10 units or more (gross)		Applications granted planning permission with 10 or more gross units		Total units (gross)	Total app.
	No. of units	% of total units	No. of app.	% of total app.	No. of units	% of total units	No. of app.	% of total app.		
2011/12 ⁴²	23	100%	13	100%	0	0%	0	0%	23	13
2012/13	100	67%	49	96%	52	33%	2	4%	150	51
2013/14	151	69%	65	94%	67	31%	4	6%	218	69
2014/15	181	100%	89	100%	0	0%	0	0%	181	89
2015/16	189	22%	85	89%	652	78%	10	11%	841	95
2016/17	285	67%	107	95%	142	33%	6	5%	427	113
2017/18	243	42%	94	91%	334	58%	9	9%	577	103
2018 ⁴³	114	31%	44	92%	250	69%	4	8%	364	48
Total	1,286	46%	546	94%	1,497	54%	35	6%	2,783	581

Five Year Housing Land Supply

3.35 The AMR 2017-2018 sets out the current housing land supply calculation and position⁴⁴. The Council is currently unable to demonstrate a 5 year housing land supply against its housing need figure as per the requirements of the NPPF⁴⁵.

3.36 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. This includes a refresh of the LAA, a call for sites⁴⁶ and an Urban Capacity Study. These evidence base studies will be published during the next public consultation on the new Local Plan.

Housing Density

3.37 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 in the Borough which are ten storeys in height and located in Walton-on-Thames.

3.38 In order to promote the best use of urban land and to protect the Borough's green spaces Core Strategy Policy CS17 Local Character Density and Design supports well designed, high quality and sustainable developments which will contribute to the achievement of an overall housing density target of 40 dph (dwellings per hectare). Other than in the St. George's Hill Estate, Burwood Park and the Crown Estate, Oxshott, a minimum of 30dph will be required. Developments within town centres should exceed 40dph.

⁴² Data is from the date of the implementation of Policy CS21 (1 August 2011) up to 31 March 2012

⁴³ Date is from 1 April 2018 up to 31 July 2018

⁴⁴ AMR 2017-2018, Chapter 4 Housing Land Supply, <https://www.elmbridge.gov.uk/planning/local-plan/>

⁴⁵ NPPF paragraph 73, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴⁶ The Call for Sites officially closed in September 2018.

3.39 The AMRs have recorded low densities in residential developments across the Borough however 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 Draft Density Study which has been prepared as part of the evidence base for the new Local Plan focuses on granted planning permissions and this will be published for the next round of public consultation on the Local Plan.

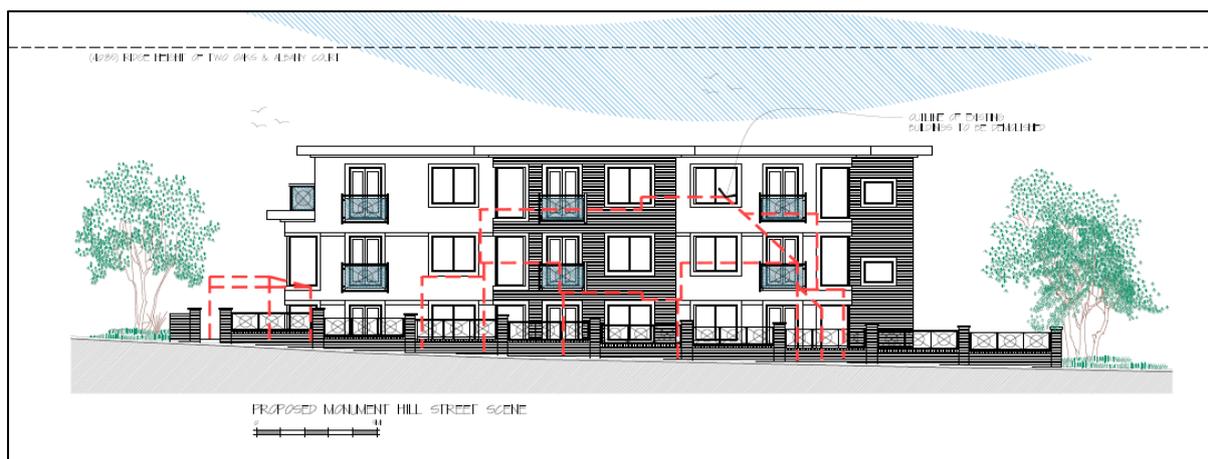
3.40 The character of the area plays an influential role in the impact on density. The settlements which are characterised by low density private residential estates, mean new developments being designed to respect the character and appearance of the area. However there are good examples of high density development which have been successfully delivered, these are Matham Court and Prior Court (see Figure 1 below) and Monument View (see Figure 2 below). 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 125dph.

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



3.41 Monument View is located in Weybridge's district 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 275dph, containing 11 flats, following the demolition of a vacant public house.

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



3.42 Until a new Local Plan is in place and given the high demand for new homes and the constrained housing land supply, it will be crucial that new developments coming forward make the most efficient use of land. The Council has published online a Development Management Advice Note 2: Optimising Development Land⁴⁷. 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.

3.43 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 an existing shortage of land for meeting identified housing need, the use of minimum density standards should be considered for other parts of the plan area. This is an important consideration for Elmbridge, as many of the Borough's train stations are located away from the shopping centre and are often in the Green Belt. The Council will need to consider creative solutions to accommodate more housing in the Borough's urban areas such as increasing density by 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 could also consider a different policy approach to density by identifying a range of densities to reflect the characteristics of different areas within the Borough.

Viability

3.44 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 an issue that is preventing developers from delivering new homes in the Borough. Viability does heavily influence the type of housing being delivered in this Borough and resulted in the dominance of large 4 bed plus luxury homes.

3.45 The Council has always sought to maximise affordable housing provision and continues to apply Core Strategy Policy CS21 Affordable Housing⁴⁸ on a case by case basis. The Statement on Affordable Housing Provision on Small Sites (November 2018) sets out evidence supporting the Council's approach. It reviews the effectiveness of Core Strategy

⁴⁷ <https://www.elmbridge.gov.uk/planning/a-guide-to-planning-policy/>

⁴⁸ Core Strategy 2011, <http://www.elmbridge.gov.uk/planning/local-plan/>

Policy CS21 including a viability analysis that demonstrated that contributions to affordable housing from sites with fewer than 10 units are viable in principle alongside CIL rates.

Site Delivery

Implementation of Planning Permissions

3.46 Local planning authorities have limited influence to deliver once planning permissions have been granted. The timescale for the implementation of a planning permission is generally not considered to be a significant issue within the Borough. Implementation generally occurs within the permission period. However, there are some instances, where developers undertake the first stages of implementing a planning permission by carrying out the demolition of buildings on site and then delay the construction of the development.

3.47 The Council has continued to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. The Council has taken a proactive approach on non-implemented planning permissions by contacting applicants that have received a recent planning permission. A small number of responses were received, a number of them identified the reduction of pre-commencement conditions as a potential action to speed up the delivery of new homes. Another response suggested reducing the amount of time taken to discharge planning conditions, and to remove the 2-tier committee structure for residential planning applications as it causes delay. Overall, no significant barriers to the delivery of the development were raised.

Planning Service Performance

3.48 The performance of decision making in the Council's Planning Service is not considered to be a barrier to delivering new homes. On the whole, planning applications are being processed within the statutory timeframes. In the AMR 2017-2018, 97% of major planning applications were processed within the statutory 13-week period. This is an increase of 5% on the previous monitoring year and is above the Council target of 83% and well above the national target of 60%⁴⁹. For minor applications, where the statutory time period to process an application is 8 weeks, 84% were processed within this timeframe, exceeding both the Council's target of 83% and the national target of 65%. This is an increase of 7% on the previous year.⁵⁰ These statistics from the AMR demonstrate the speed of decision making by the Planning Service. The timely processing of planning applications is not preventing the granting of planning permissions and in turn the delivery of new homes.

3.49 On those sites where planning permission is refused, the Planning Service appeal's performance is good (see Table 7 below). The Council has continued to win appeal decisions on large sites located within the Green Belt. During 2017-2018, 71% of planning appeal decisions were made in favour of the Council and dismissed. This statistic demonstrates the soundness of decision making by the Planning Service and that unsound decisions are not leading to unnecessary delays and costs to the delivery of new homes.

Table 7: Planning Service Appeals Performance

⁴⁹AMR 2017-2018, page 8, <http://www.elmbridge.gov.uk/planning/local-plan/>

⁵⁰ AMR 2016-2017, paragraph 13.5, page 100, <http://www.elmbridge.gov.uk/planning/local-plan/>

	Appeals Allowed	Appeals Dismissed
April to June 2017 (Quarter 1)	36%	64%
July to September 2017 (Quarter 2)	14%	86%
October to December 2017 (Quarter 3)	48%	52%
January to March 2018 (Quarter 4)	24%	76%
2017/18	29%	71%

Borough-wide Infrastructure

3.50 The Council has considered whether the current provision of infrastructure in the Borough is acting as a barrier for the delivery of new homes. For the current planning permissions in place, there are no infrastructure barriers preventing the commencement of sites.

Conclusion

3.51 The high demand for housing and the need to deliver more new homes is a pressure not only felt by this Council but also across the other authorities in the Housing Market Area and neighbouring authorities.

3.52 The Borough experiences significant affordability issues and has some of the highest house 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 from all net additions including those on small sites.

3.53 The Council had a successful record of delivering new homes against the Core Strategy housing target of 225 new homes per year. However the need for new homes is now 623 and has increased significantly since the Core Strategy. This has resulted in the Council underperforming in the delivery of new homes against the number of new homes needed.

3.54 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 the AMRs highlights the continued delivery of large sized homes consisting of 4 bedrooms plus. In response to this issue, the Council published a Development Management Advice Note on understanding housing need for developers and planning agents.

3.55 The Borough is heavily constrained by land designations which means much of the housing land supply is severely limited. The LAA (2016) 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.

3.56 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.

3.57 The analysis of the Planning Service shows there are no significant issues delaying the granting of planning permissions and the Council's appeals performance is good. The analysis of feedback from developers and agents highlighted there were no major issues effecting housing delivery such as viability or land banking.

3.58 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 developable⁵¹ sites for housing. Further evidence base studies will be published during the next round of public consultation on the Local Plan.

3.59 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 will continue to pro-actively engage with developers, planning agents and applicants through the pre-application advice service to encourage the submission of development schemes that make efficient use of land and meet our housing needs.

⁵¹ NPPF 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. <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

4 The Action Plan

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. 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 Service and the Asset and Property Management Services.

4.2 The need to produce a new Local Plan with an up to date housing target is recognised as a corporate priority. By boosting housing delivery as well as responding to housing need, the Council can ensure that it delivers more homes in a way that carefully balances the objectives set out in the new Local Plan as well as making a positive contribution towards meeting its identified housing needs.

What have the Council done so far?

4.3 The tables below set out the wide range of positive actions that the Council has already taken to increase the supply of new homes and support the delivery of the housing we need. These actions have been carried out across the Council's services including Planning, Housing and Asset Management and Property Services.

LOCAL PLAN PROGRESS		
Action	Department Responsible	Delivery Date
✓ The Planning Policy Team have been progressing the preparation of the new Local Plan. The need for a new Local Plan is crucial as it will include an up to date housing target. A Strategic Options consultation was carried out at the end of 2016 into early 2017. The Local Development Scheme (LDS) has been updated and published online which sets out the timeframe for progressing the new Local Plan.	• Planning Service	• October 2018
✓ The Planning Policy Team contacted all applicants, agents and developers who have been granted planning permission to find out if there are any issues preventing the delivery of housing.	• Planning Service	• Summer 2018
✓ The Planning Policy Team have published a series of evidence base documents to support the Strategic Options 2016 consultation. A number of evidence base studies are being progressed to inform the next stage in the preparation of the Local Plan, these include an Urban Capacity Study, where a proactive approach was taken to contact land owners and a 'call for sites' was undertaken. A refresh of the Land Availability Assessment and a new Density Study has been completed. All of the evidence base documents will be published during the next public consultation on the new Local Plan.	• Planning Service	• 2016 to date
✓ The Planning Policy Team has 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 Service	• December 2018
✓ 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	• Planning Service	• January 2015

view online. ⁵² The Scoping Statement sets out the scope of the 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.		
✓ The Planning Department organised the annual Members training programme. The first training session focused on density and included a a tour of the Borough to view examples of high density developments. Members training has also taken place on the Development Management Advice Notes Understanding Housing Need and Optimising Development Land.	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • June/July 2018

IMPROVING DECISION MAKING

Action	Department Responsible	Delivery Date
✓ The Planning Service has a Special Projects Officer who focuses on resource planning and provides support to the Planning Policy and Development Management teams. They provide significant input on planning appeals and monitor appeal performance. In the future, this type of role would be ideally placed to help with the implementation and delivery of development sites.	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • April 2018
✓ The Council has 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 meeting the identified housing need and how development proposals for residential schemes must make a positive contribution towards meeting the types of homes needed.	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • November 2018
✓ The Council has 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	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • November 2018
✓ The Council has 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	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • April 2019

⁵² <http://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

approach in Policy CS21 and requiring affordable housing contributions on small sites.		
✓ The Council 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 Service	• January 2018
✓ The pre-application advice service has been formalised and streamlined to provide four levels of pre-application advice ranging from bronze to platinum and the webpage has been improved ⁵³ . The improved pre-application service has a strong emphasis on front-loading to reduce the time spent on decision making and use of planning conditions.	• Planning Service	• June 2015
✓ The Local Validation Checklist has been reviewed and updated with clear expectations. These seek 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 ⁵⁴ .	• Planning Service	• October 2018

SUPPORTING AFFORDABLE HOUSING DELIVERY

Action	Department Responsible	Delivery Date
✓ The Community Wellbeing Priority H2 in the The Elmbridge Council Plan 2018 - 2019 ⁵⁵ is to help meet the need for affordable housing through a housing company owned by the Council. In February 2018, the Council agreed to establish a Council-owned housing company with the aim of building homes to meet the needs of residents. It will initially focus on developing Council owned land and acquiring existing street properties. The housing company started planning for development in 2018, taking ownership of around 10homes.	• Housing Services	• March 2019 (Elmbridge Council Plan 2018/19)

⁵³ Pre-application Advice Service, <http://www.elmbridge.gov.uk/planning/preapp/>

⁵⁴ Local Validation Checklist, <http://www.elmbridge.gov.uk/planning/make-a-planning-application/>

⁵⁵ This is the Council's strategic plan that sets out the priorities and targets for the 2018-2019 financial year.

<ul style="list-style-type: none"> ✓ The Community Wellbeing Priority R3 in the Elmbridge Council Plan 2018 - 2019⁵⁶ is 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 to facilitate the delivery of affordable housing by developing three Council owned sites by March 2019. 	<ul style="list-style-type: none"> • Asset Management and Property Services 	<ul style="list-style-type: none"> • March 2019 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> ✓ 5 affordable homes having secured planning in January 2018 are being provided at Albemarle House in Thames Ditton. 	<ul style="list-style-type: none"> • Asset Management and Property Services 	<ul style="list-style-type: none"> • March 2019 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> ✓ 5 affordable homes are being provided through the redevelopment of Weybridge Hall having secured planning permission in April 2018 to convert the hall to a cinema and the upper floors to residential use. 	<ul style="list-style-type: none"> • Asset Management and Property Services 	<ul style="list-style-type: none"> • March 2019 (Elmbridge Council Plan 2018/19)

⁵⁶ This is the Council's strategic plan that sets out the priorities and targets for the 2018-2019 financial year.

SUPPORTING WIDER HOUSING OPPORTUNITIES

Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> ✓ Based on evidence provided as part of the 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. 	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • Ongoing
<ul style="list-style-type: none"> ✓ The Council published its Brownfield Register in 2017 which identifies suitable sites for housing using previously developed land⁵⁷. The register will be updated on an annual basis. 	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • 2017
<ul style="list-style-type: none"> ✓ The Council has established an online self-build and custom build register⁵⁸. The register provides the Council with an indication of the demand for self and custom build. Data collated from the register is reported in the Authority Monitoring Report which is published annually. 	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • 2017
<ul style="list-style-type: none"> ✓ 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: <ul style="list-style-type: none"> • Brooklands Industrial Estate • Hershams Trading Estate (including North Weylands Trading Estate) • Molesey Industrial Estate • Riverdene Trading Estate 	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • October 2014
<ul style="list-style-type: none"> ✓ 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. 	<ul style="list-style-type: none"> • Planning Service 	<ul style="list-style-type: none"> • April 2013

⁵⁷ <http://www.elmbridge.gov.uk/brownfield-land-register/>

⁵⁸ <http://www.elmbridge.gov.uk/planning/self-build/>

What more can the Council do?

4.4 The Council will continue to positively seek out further opportunities to increase its housing delivery as set out in the tables below and will work closely with the relevant Council services and external organisations to achieve this.

LOCAL PLAN PROGRESS		
Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> 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 2018-2019 Character and Environment Priority P1 which is to ensure that the Council has an up to date Local Plan that supports the delivery of sustainable development. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> January 2021 (Local Development Scheme October 2018)
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> August 2019

IMPROVING DECISION MAKING

Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> The Council will review the Developers Contributions Supplementary Planning Document (SPD). 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> November 2019 (Local Development Scheme October 2018)
<ul style="list-style-type: none"> Review the standard conditions list for planning applications. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> March 2018 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> Continue to reduce the number of applications determined after the statutory deadline. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> March 2019 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> Continue to determine application in accordance with current National and Local Planning guidance 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> March 2019 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> Continue to develop and offer a proactive pre-application service to support the delivery of sustainable development. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> March 2019 (Elmbridge Council Plan 2018/19)

SUPPORTING WIDER HOUSING OPPORTUNITIES

Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> The Council will continue dialogue with developers and land owners to monitor build out rates and obtain information on barriers to delivering housing. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> Ongoing

<ul style="list-style-type: none"> The CIL Levy Charging Schedule will be reviewed and a new schedule will be adopted (Elmbridge Council Plan 2018/19 Priority P3). 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> January 2021 (Local Development Scheme October 2018)
<ul style="list-style-type: none"> The Council will improve local and strategic infrastructure using CIL. This will provide supporting infrastructure to support housing growth. (Elmbridge Council Plan 2018/19 Priority P3). 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> March 2019 (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> The Planning Policy Team will review and update the Infrastructure Delivery Plan. 	<ul style="list-style-type: none"> Planning Service 	<ul style="list-style-type: none"> August 2019
<ul style="list-style-type: none"> The Council will to review publicly owned sites and work with external organisations who own land in this Borough to identify any potential opportunities for housing development/land swap. This will involve working with Surrey County Council and other stakeholders to develop ways to free up land for regeneration projects (One Public Estate). Identify land resources that could be released (Elmbridge Council Plan 2018/19 Priority R2). 	<ul style="list-style-type: none"> Asset Management and Property Services 	<ul style="list-style-type: none"> Ongoing
<ul style="list-style-type: none"> Explore with Surrey County Council and stakeholders an integrated database of potential assets for release (Elmbridge Council Plan 2018/19 Priority R2). 	<ul style="list-style-type: none"> Asset Management and Property Services 	<ul style="list-style-type: none"> December 2018 (Elmbridge Council Plan 2018/19)

SUPPORTING AFFORDABLE HOUSING DELIVERY

Action	Department Responsible	Delivery date
<ul style="list-style-type: none"> The Council will continue to progress the establishment of two housing companies to deliver affordable housing and purchase homes (Elmbridge Council Plan 2018/19 Priority H2). 	<ul style="list-style-type: none"> Housing Service 	<ul style="list-style-type: none"> Housing Company to have at least 5 homes in ownership by December 2018. (Elmbridge Council Plan 2018/19) Housing Company to have at least 10 homes in ownership by March 2019. (Elmbridge Council Plan 2018/19)
<ul style="list-style-type: none"> The Council will explore options to buy existing housing and street properties within the Borough by March 2019 (Elmbridge Council Plan 2018/19 Priority R3). 	<ul style="list-style-type: none"> Asset Management and Property Services 	<ul style="list-style-type: none"> March 2019 (Elmbridge Council Plan 2018/19)

5 Next Steps

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 Planning Policy Team on an annual basis. Future Action Plans will be produced by the Planning Policy Team then formally approved by Individual Cabinet Member Decision Making (ICMDM) and published online.

5.2 Monitoring information will be collected from a range of sources such as the Authority Monitoring Report, the Elmbridge Council Plan, the Planning Service Delivery Report, Quarterly Returns, appeals monitoring and housing trajectory along with any other relevant documents.

5.3 The 'Actions' will be implemented by those services indicated in the 'Department Responsible' column. Actions will be updated where necessary and new actions will be added in response to any changes in legislation, Government policy and practice guidance.

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 Team with your suggestions by:

Email: planningpolicy@elmbridge.gov.uk

Telephone: 01372 474474

Appendix 1: National Planning Policy Framework

Ministry of Housing, Communities and Local Government
National Planning Policy Framework
July 2018

The presumption in favour of sustainable development

Paragraph 11:

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

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-date⁷, 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 proposed⁶; 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.

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.

**Ministry of Housing, Communities and Local Government
National Planning Policy Framework
July 2018**

Maintaining supply and delivery

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 policies³⁶, or against their local housing need where the strategic policies are more than five years old³⁷. 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 plan³⁸, 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 supply³⁹.

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.

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.

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.

Appendix 2: Planning Practice Guidance

What is the Housing Delivery Test action plan? ⁵⁹

The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

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.

Any area may wish to produce an action plan as a matter of good practice or to identify processes to exceed housing requirements and support delivery. This could include local planning authorities where delivery meets, or exceeds, 95% of their housing requirement. In areas not measured by the Housing Delivery Test, such as National Park Authorities, the Broads Authority and development corporations without (or which do not exercise) both plan-making and decision-making functions, 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 land owners;
- infrastructure providers (such as utility providers, highways, etc);
- upper tier authorities (county councils) in two-tier areas;
- neighbouring authorities with adjoining or cross-boundary sites.

What aspects 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 (including land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.);
- whether sufficient planning permissions are being granted and whether they are determined within statutory time limits;

⁵⁹ Planning Practice Guidance on Housing Delivery Test, <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#housing-delivery-test>

- whether the mix of sites identified is proving effective in delivering at the anticipated rate.
- whether proactive pre-planning application discussions are taking place to speed up determination periods;
- the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery;
- whether issues, such as infrastructure or transport for example, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable;
- 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 issues, such as infrastructure or transport for example, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable;
- whether proactive pre-planning application discussions are taking place to speed up determination periods;
- whether the mix of sites identified is proving effective in delivering at the anticipated rate.

What actions 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, including public sector land and brownfield land;
- working with developers on the number of houses on site, including whether sites can be subdivided;
- offering more pre-application discussions to ensure issues are addressed early;
- consider the use of Planning Performance Agreements;
- carrying out a new Call for Sites, as part of plan revision;
- revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies;
- reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;
- establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed;
- ensuring evidence on a particular site is informed by an understanding of viability;
- considering compulsory purchase powers to unlock suitable housing sites;
- using Brownfield Registers to grant permission in principle to previously developed land;
- encouraging the development of small sites and higher site densities.

When will the action plan be implemented?

To ensure the document is as useful as possible, local planning authorities should publish an action plan within 6 months of publication of the Housing Delivery Test result.

Appendix 3: Standard Method Calculation

The standard method as set out in the revised NPPF is used to calculate the Borough's housing need. The Planning Practice Guidance provides more detail on the calculation⁶⁰.

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 years, 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 calculated 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, 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:

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

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 of 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.

⁶⁰ Housing Need Assessment, updated 20th February 2019, <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

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 Standard Method Calculation

As set out in responses to previous national consultations, Elmbridge Borough Council considers that the standardised method 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 Housing Market Areas (HMAs).

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 standard method would more accurately reflect actual housing need.

Appendix 4: Borough Map of Green Belt

