

# **Tandridge District Council**

**Housing Delivery Test Action Plan 2025**

**June 2025**



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## 1 Introduction

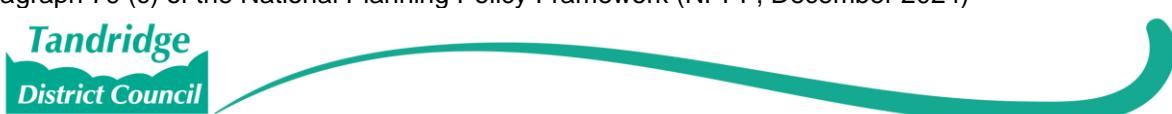
- 1.1 This document sets out the Housing Delivery Test Action Plan (HDTAP) for Tandridge District Council. This is in response to the requirement<sup>1</sup> that a Local Authority is to produce an action plan where its Housing Delivery Test (HDT) result falls below 95%.
- 1.2 The HDT measures housing delivery over a 3-year period against the established housing requirement. The HDT was introduced as part of the July 2018 National Planning Policy Framework (NPPF) revisions and is intended to help address the housing crisis by encouraging the delivery of more homes.
- 1.3 The HDT is a percentage measurement of the net number of homes delivered against the number of homes required by the Government in accordance with set criteria and within the area of the relevant plan-making authority<sup>2</sup>. DLUHC publish the results annually demonstrating the previous three financial years measurement; with the 2023 measurement covering 2020/21, 2021/2022, and 2022/2023.
- 1.4 On 12 December 2024 the results of the 2023 HDT were published. Tandridge District Council was identified as having delivered 42%<sup>3</sup> of the required level. In accordance with para 79 of the NPPF, consequently must produce a Housing Delivery Test Action Plan with subsequent 20% buffer added to the Five-year Housing Land Supply (5YHLS) calculation. The application of the presumption in favour of sustainable development<sup>4</sup> is also engaged.
- 1.5 The delivery and requirement are set out in Table 1:

<sup>1</sup> Paragraph 79 of the National Planning Policy Framework (NPPF, December 2024)

<sup>2</sup> [Housing Delivery Test measurement rule book - GOV.UK \(www.gov.uk\)](#)

<sup>3</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

<sup>4</sup> Paragraph 79 (c) of the National Planning Policy Framework (NPPF, December 2024)



Financial year	2020-2021	2021-2022	2022-2023	Total
<b>Number of homes required</b>	430	644	642	1,716
<b>Number of homes delivered</b>	162	246	308	716
<b>+ / -</b>	-268	-398	-334	-1,000
<b>% of homes required delivered</b>			42%	

Table 1: Housing Delivery Test measurement

\* Note that the figures in the published HDT result differ from the completions set out in Table 4 - this is due to the availability of updated information; there is also a discrepancy between the previous published HDT result and this years' HDT result.

## 1.2 Purpose

1.6 The purpose of this HDTAP is to present an update to previous iterations of the HDTAP. The most recent HDTAP 2024 presented the 2022 measurement; this HDTAP will present the 2023 measurement and will also identify what measures the Council will take to improve housing delivery.

## 1.3 Approach

1.7 This HDTAP has been prepared taking into account the national Planning Practice Guidance (PPG) and in the context of the historic trends and characteristics of permissions and housing delivery for the district. It also reviews the work the Council currently undertakes as part of the Authority's Monitoring Report (AMR) which includes annually updating the housing land supply position. Through this regular monitoring the Council has an understanding of the key challenges that face housing delivery in Tandridge. This is derived from analysing the historical nature of, and progress on, permissions for housing and identifying general and site-specific delivery challenges.

## 1.4 Scope of Report

1.8 The document will provide a background to the legislation and the policy context that informs a HDTAP and provide information regarding the purpose, aim, and approach in determining an action plan. Further to this, the following matters will be addressed:

- Housing Delivery

- Housing Delivery Analysis
- Identification of Causes of Insufficient Housing Delivery
- Response and Action Plan
- Monitoring Arrangements.

## 2 Policy Context

2.1 This section outlines the policy context of the Housing Delivery Test, focusing on the relevant national planning policy and guidance that shape its application. The National Planning Policy Framework establishes the overarching principles for housing delivery, while the Planning Practice Guidance provides detailed interpretation and implementation guidance. These documents set out the expectations for local planning authorities in maintaining an adequate land supply, assessing housing need, and responding to under delivery.

### 2.2 National Planning Policy Framework<sup>5</sup> (NPPF)

2.2 The HDT was first included in the 2018 NPPF revision and has since been included in all subsequent iterations. The policy states the repercussions for an authority's failure to meet the required level of development ascertained through the HDT calculation. Paragraph 79 of the NPPF (December 2024) states:

*To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:*

- 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 78 of this framework, 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 this Framework, in addition to the requirements for an action plan and 20% buffer.*

<sup>5</sup> [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/publications/national-planning-policy-framework)

2.3 As can be seen, the action required from an authority depends on the level of housing delivery over the HDT period. Paragraph 80 of the NPPF goes on to state:

*The Housing Delivery Test consequences set out above will apply the day following the annual publication of the Housing Delivery Test results, at which point they supersede previously published results. Until new Housing Delivery Test results are published, the previously published result should be used.*

2.4 At paragraph 81, the NPPF provides Local Planning Authorities with considerations to implement in order to increase housing delivery:

*To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start.*

## 2.3 Planning Practice Guidance<sup>6</sup> (PPG)

2.5 The *Housing Supply and Delivery*<sup>7</sup> section of the PPG further expands upon the requirement of the NPPF and provides information regarding how the HDT<sup>8</sup> is applied and additional guidance regarding the production of a HDTAP<sup>9</sup>, how this should be produced and what it should include.

2.6 In regard to the production of an Action Plan, the guidance states how an authority should identify the reasons for under delivery, explore ways to reduce the risk, and set out measures to improve delivery. The guidance further provides direction on who an authority can involve in the production of the HDTAP, listing:

- small and large developers;
- land promoters;
- private and public land owners;

<sup>6</sup> [Planning practice guidance - GOV.UK](https://www.gov.uk/government/publications/planning-practice-guidance-for-local-planning-authorities)

<sup>7</sup> [Housing supply and delivery - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-supply-and-delivery)

<sup>8</sup> Paragraph: 034 Reference ID: 68-042-20241212 - Paragraph: 046 Reference ID: 68-046-20190722

<sup>9</sup> Paragraph: 047 Reference ID: 68-047-20190722 - Paragraph: 054 Reference ID: 68-054-20190722

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

2.7 The guidance goes on to state what a Local Authority could review as part of the Action Plan, examples of which comprise:

- barriers to development commencement and delivery on sites identified as part of the 5YHLS;
- whether sufficient planning permissions are being granted within statutory time limits;
- whether the mix of sites identified is proving effective; and
- the level of ongoing engagement with key stakeholders.

2.8 Additionally, the guidance provides information on what a Local Authority could consider as part of the Action Plan in order to boost delivery, including:

- revisiting the Housing and Employment Land Availability Assessment (HELAA) and carrying out further Call for Sites exercises;
- revising the site allocations policy within the development plan;
- working with developers on the phasing of sites; and
- using the Brownfield Land Register to grant permission in principle.

2.9 Finally, the guidance advises on when the Action Plan should be published, and the monitoring responsibilities of the authority.

## 2.4 Historical Policy Context

2.10 It should be noted that previous iterations of the HDTAP and Five Year Housing Land Supply (5YHLS) have presented and used housing delivery positions that were resultant of the Housing Provision (for purpose of calculations) presented in the adopted 2008 Core Strategy<sup>10</sup> of 125 dpa. This was adopted under the previous policy framework: Planning Policy Statement 3, whereby housing provision is established using '*the Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts*' (PPS3 para 33 2006). The NPPF was introduced in 2012 to consolidate and replace previous Planning Policy Statements whereby it states at the first bullet point of paragraph 47:

*To boost significantly the supply of housing, local planning authorities should:*

<sup>10</sup> [Adopted development plan - Tandridge District Council](#)

*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.*

2.11 The determination of housing need has since been amended in later editions of the NPPF with the latest Standard Method published as part of the NPPF 2024 update.

## 2.5 Implications of Policy Context

2.12 As set out in the Introduction, the latest published HDT result for Tandridge falls below 75%, therefore NPPF (December 2024) paragraph 79c applies within the district, i.e.:

*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 this Framework, in addition to the requirements for an action plan and 20% buffer.*

2.13 Housing delivery and supply is monitored in the Council's Authority's Monitoring Report<sup>11</sup> (AMR). As stated, the AMR and housing land supply position has historically been assessed against the policies contained in the Core Strategy (2008), including the housing requirement of 125 dwellings per year.

2.14 The AMR is due for publication toward the end of 2025, however, a standalone 5YHLS statement will be published in advance of this demonstrating the supply position as at 01/04/25.

2.15 The NPPF and PPG sets out how Local Planning Authorities should calculate its 5YHLS. At paragraph 78 the NPPF states:

*....Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old....*

<sup>11</sup> [Monitoring](#) – AMR 2023/24

- 2.16 Where strategic policies are more than five years old, this supply must be based on Local Housing Need (calculated using the Standard Method) until such a time that a new housing requirement figure is established through a local plan examination.
- 2.17 The Standard Method previously used population estimates and applied an affordability ratio to determine a Local Housing Need. The 2024 NPPF update amended the Standard Method to use existing housing stock as a basis for household growth. It also changed the application of the affordability adjustment which subsequently led to an increased affordability ratio.
- 2.18 It is worth noting that the Local Housing Need figure does not have regard to major policy constraints to development such as those identified later within this document and consistently through each iteration of the NPPF, including the Green Belt. Consequently, until such time when a new Local Plan housing requirement (that has properly factored in major policy constraints) is adopted Tandridge is judged as underperforming in terms of housing delivery.

### 3 Relationship to Other Council Plans and Strategies

3.1 This section will outline the Council's Plans and Strategies that inform the Action Plan with an aim to encourage housing and economic growth. It will also provide update on the progress of the Local Plan Review.

#### 3.2 Plans and Strategies

3.2 The existing plans and strategies that inform the Action Plan include:

- **Corporate Plan 2024 to 2028<sup>12</sup>** – The Corporate Plan is a document which sets out the Council's vision, priorities and actions that will take the Council through to 2028. It recognises and reflects the district's special characteristics, the needs of residents and businesses and the wider context in which the Council operates. The Corporate Plan outlines the Council's aims to:
  - Protect the environment, deliver affordable housing and boost the local economy.
  - Put residents and local businesses at the heart of what we do and be responsive to their needs.
  - Deliver high quality services and value for money.
  - Provide financial prudence and sustainability.
  - Provide clear and effective communication.
- **Housing Strategy 2019-2023<sup>13</sup>** – The Housing Strategy<sup>14</sup> sets out the Council's vision and plans for housing for the five-year period that the strategy covers. It identifies the challenges the Council faces in its enabling role as a builder of new homes, as a landlord in the context of a growing and ageing population, changing government policies, a high-cost housing market and a challenging economic climate.
- **Interim Policy Statement for Housing Delivery<sup>15</sup>** – a previous iteration of the HDTAP introduced the Interim Policy Statement for Housing Delivery, which was adopted at Planning Policy Committee on 22/09/22. The document provides criteria for Development Management to assess planning applications against and determine accordingly – an update to this is provided in section 4.3.6.

<sup>12</sup> <https://www.tandridge.gov.uk/Portals/0/Documents/Your-council/Strategies-plans-policies/Corporate-Plan-2024-2028.pdf?ver=Svkj0zC6einrXkIriuR8ow%3d%3d>

<sup>13</sup> 13

<https://www.tandridge.gov.uk/Portals/0/Documents/Housing/Strategies%20and%20policies/Tandridge-Housing-Strategy-2019-2023.pdf>

<sup>14</sup> This document is due to be updated during the 2025/26 financial year covering the period 2024 - 2028

<sup>15</sup> 15

<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Other%20policies%20and%20guidance/Interim-Housing-Policy-Statement.pdf?ver=BXWQmJZovflWKOCQOTXOoA%3d%3d>

- **Adopted development plan<sup>16</sup>** – Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require decisions to be taken in accordance with the development plan, unless there are material considerations that indicate otherwise with the Tandridge Development Plan comprising the:
  - Tandridge District Core Strategy 2008
  - Tandridge Local Plan Part 2: Detailed Policies 2014-2029
  - Caterham, Chaldon & Whyteleafe Neighbourhood Plan 2021
  - Limpsfield Neighbourhood Plan 2019
  - Tatsfield Neighbourhood Plan 2024
  - Woldingham Neighbourhood Plan 2016
  - Surrey Waste and Minerals Plans

### 3.3 Local Plan Review

- 3.3 Following the withdrawal of Our Local Plan 2033, it was agreed at Full Council on 18 April 2024, that the Council will start work on a new Local Plan. Since this time, the government have introduced a number of reforms to the planning system and during December 2024, published an update to the National Planning Policy Framework (NPPF).
- 3.4 Local Planning Authorities at the start of their plan-making process, are required to produce a new Local Development Scheme<sup>17</sup> outlining the timeline for adoption of their Local Plan. The latest Local Development Scheme was approved at the February 2025 Planning Policy Committee and outlines the timeframe in which the Council aim to adopt the emerging Local Plan.
- 3.5 An appropriate spatial strategy and housing requirement for the new plan-period has yet to be established. Therefore, the Council are not in a position to address the immediate housing need through the plan-making process. Subsequently, the Council are reliant on the existing Interim Policy Statement for Housing Delivery and other actions identified in the Action Plan until such time as a new Local Plan has made sufficient progress for it to be a material consideration in decision-making.

<sup>16</sup> [Adopted development plan](#)

<sup>17</sup> [Local Development Scheme](#)

## 4 Housing Need and Completions Analysis

4.1 This section will present the Local Housing Need (LHN) determined by the Standard Method and will provide analysis for housing completions. The completion analysis will include a breakdown of yearly completion rate; completions plotted onto a graph to demonstrate completion trend; a detailed analysis of windfall development; lapse rate analysis; and review of the Interim Policy Statement for Housing Development.

### 4.2 Local Housing Need

4.2 As the policies in the Core Strategy (2008) are in excess of 5 years old, the Council are required to determine the LHN using the Standard Method. For the purpose of this document, the LHN equates to 827 dwellings per annum. For the purpose of demonstrating a 5YHLS the LHN will need to include a 20% buffer, and therefore equates to 993 dwellings pa:

Local Housing Need calculation	
Dwelling Stock	38,160
Dwelling Stock by 0.8%	305.28
Affordability ratio average	13.98
Adjustment factor	2.71
Total LHN	827
Buffers	
LHN	827
LHN with 20% buffer	992

**TABLE 1: LOCAL HOUSING NEED (STANDARD METHOD) 2025 – 2029**

Affordability ratio					
Year	2020	2021	2022	2023	2024
Affordability ratio	13.95	15.87	14.68	12.44	12.98
<b>Average ratio</b>	<b>13.98</b>				

**TABLE 2: AFFORDABILITY RATIO CALCULATION**

### 4.3 Housing Completions Analysis

4.3 The analysis set out in this section demonstrates that the delivery of homes in the district has not previously been an issue when assessed against the housing requirement in the adopted Core Strategy 2008. Due to changes to national policy, this is no longer the case which has resulted in a shortfall

against the new method for assessing housing needs that as a consequence of landscape and policy constraints, the Council will struggle to meet.

#### 4.3.2 Housing Completions

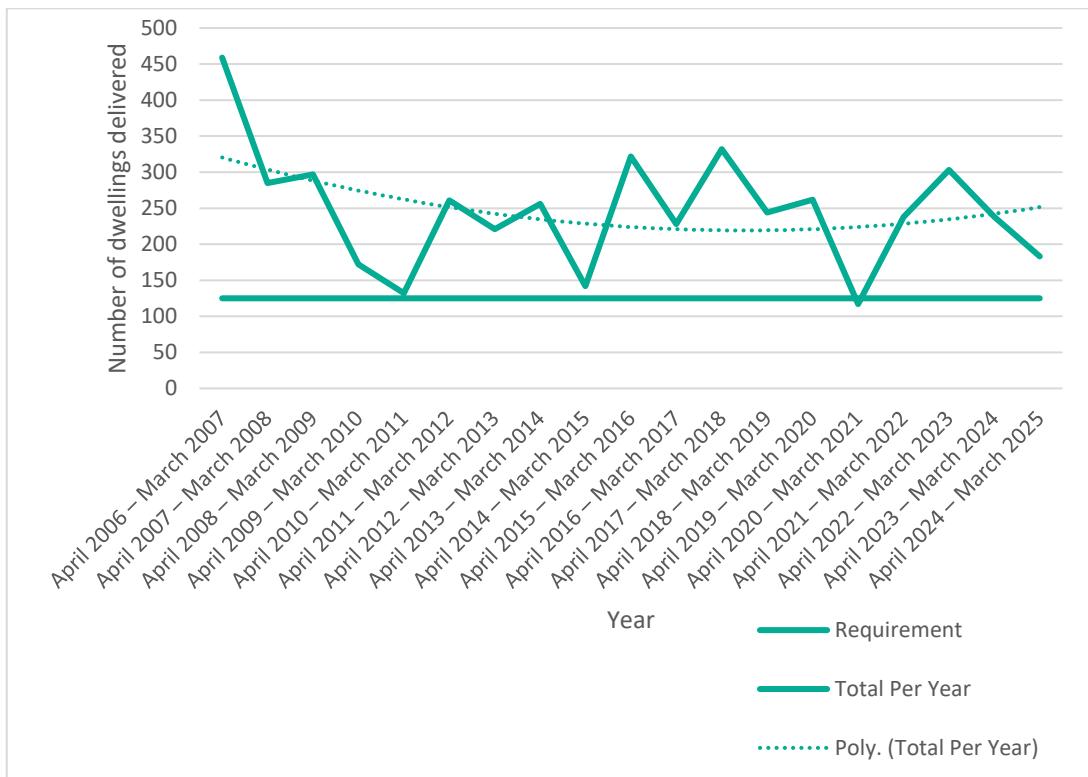
4.4 Table 3 demonstrates the net number of homes that have been delivered since 2006 (the start of the adopted Plan Period) - **note that the completions data for years 2020-21, 2021-22, and 2022-23 were used for the latest HDT.**

4.5 Table 3 and Figure 1 identify an uptick in completions in the years that proceeded the initial wave of Covid-19, of which saw a significant drop. However, as can be seen, the 2024/25 completions have seen a reduced housing delivery when compared against the previous three years since the 2020/21 monitoring year. This results in an average delivery of 247 dwellings per year.

4.6 When compared against the housing provision in the adopted Core Strategy (2008) of 125 dwellings per year (2006 – 2026 plan period), it is clear that the Council has consistently met and exceeded this requirement (with the exception of 2020/21 the first year of the Covid-19 pandemic). It is also evident from Fig 1 that since the increased delivery of 459 dwellings during 2006/07, the overall development in the district is on an upward trend.

Year	Total Per Year	Cumulative Total
April 2006 – March 2007	459	459
April 2007 – March 2008	285	744
April 2008 – March 2009	297	1,041
April 2009 – March 2010	172	1,213
April 2010 – March 2011	132	1,345
April 2011 – March 2012	261	1,606
April 2012 – March 2013	221	1,827
April 2013 – March 2014	256	2,083
April 2014 – March 2015	142	2,225
April 2015 – March 2016	322	2,547
April 2016 – March 2017	228	2,775
April 2017 – March 2018	332	3,107
April 2018 – March 2019	244	3,351
April 2019 – March 2020	262	3,613
April 2020 – March 2021	117	3,730

Year	Total Per Year	Cumulative Total
April 2021 – March 2022	238	3,968
April 2022 – March 2023	303	4,271
April 2023 – March 2024	238	4,509
April 2024 – March 2025	183	4,692
<b>Average:</b>	<b>247</b>	

**TABLE 2: HOUSING COMPLETIONS****FIGURE 1: ANNUAL NET DWELLINGS COMPLETED**

#### 4.3.3 Periods of Decline and Contributing Factors

4.7 The fluctuations in housing completions reveal several periods where delivery dropped into the 100s, particularly in 2009–2011, 2014–2015, 2020–2021, and 2024–2025. These declines can potentially be attributed to a mix of economic, political, global, and planning factors.

4.8 A point of note is that each period that saw a decline in housing delivery coincided with the year of a General Election, the year that followed or an upcoming General Election, of which often accord with periods of reduced housing delivery due to:

- **Policy Uncertainty:** Developers and Councils may delay decisions until the new government's priorities are clear.
- **Economic Impacts:** Elections can influence market confidence, affecting investment in housing projects.
- **Administrative Delays:** Local authorities may experience slower processing times during election periods.

4.9 The 2009 – 2011 decline can potentially be attributed to the 2008 global financial crisis with the aftermath of the crisis leading to reduced developer confidence and tightened mortgage lending. The 2010 General Election brought a change in government, with new policies and priorities that may have caused uncertainty in the housing market.

4.10 2014 – 2015 preceded the 2015 General Election which may have led to uncertainty whilst developers await new policy.

4.11 The 2020 – 2021 decline followed the 2019 General Election but more importantly was the start of the COVID-19 Pandemic. Lockdowns, supply chain disruptions, and workforce shortages halted construction and delayed planning decisions. Developers faced financial instability, and buyers hesitated due to job security concerns and many councils experienced backlogs in planning applications due to remote working challenges.

4.12 2024 – 2025 saw interest rate increases and mortgage pressures which may have reduced demand for new homes. The 2024 General Election resulted in a new government who swiftly entered into considerable planning reforms creating uncertainty, with developers and councils potentially delaying decisions until post-election policies are clarified. The economic uncertainty and affordability concerns could also have led to fewer developments being completed.

#### 4.3.4 Windfall Development

4.13 The NPPF defines Windfall development as “Sites not specifically identified in the development plan”. Therefore, as the Council do not have an up-to-date development plan or adopted Site Allocations Development Plan Document, notwithstanding potential development allocations within Neighbourhood Plans, all development at present should be considered as ‘windfall’.

4.14 Previous iterations of the HDTAP and the AMR in relation to Housing Supply have considered windfall developments as those that comprise small sites, in particular sites of 4 dwellings or fewer. Previous iterations HDTAP also did not include development within residential garden land in their windfall calculations – this was a legacy policy from the 2012 NPPF which was

categoric in its omission. Since the 2018 NPPF update, this is no longer the case with there being no requirement to omit residential garden land from calculations. Subsequently future housing supply calculations will now include planning permissions on residential garden land, and all planning permissions regardless of site capacity, until such a time as a new development plan including sites for allocation is adopted and / or national policy is amended.

4.15 Table 3 presents the Windfall development position from the monitoring years 2013/14 to 2024/25. The start date of 2013/14 is used due to evidence from the 2013 AMR demonstrating that this was the point that all but one previously allocated site had been completed. The Council therefore deem this as an appropriate point to determine their windfall contribution. As the final allocated site was completed during the period 2020 – 2023, the total number of completions on this site (111) has been deducted from the total completions to avoid double counting.

Year	9 or fewer units	10 or higher units	TOTAL
2013 - 2014	112	144	256
2014 - 2015	54	88	142
2015 - 2016	88	234	322
2016 - 2017	36	192	228
2017 - 2018	116	216	332
2018 - 2019	110	134	244
2019 - 2020	74	188	262
2020 - 2021	82	35	117
2021 - 2022	48	190	238
2022 - 2023	37	266	303
2023 - 2024	92	146	238
2024 - 2025	91	92	183
<b>TOTAL</b>	<b>940</b>	<b>1,925</b>	<b>2,865</b>
Minus 111 from app 2018/729		1,814	2,754
<b>Average</b>	<b>78</b>	<b>151</b>	<b>230</b>

**TABLE 3: WINDFALL COMPLETIONS**

4.16 The windfall analysis shows a total of 2,754 dwellings were completed over the 12-year period (2013 – 2025) or an average of 230 dwellings per year. The data was further split into two groups: completions on small sites i.e., 9 units or fewer; and completions on Major Development Sites i.e., sites of 10 units or

higher. The assessment demonstrates that there were 940 completions on small sites and 1,814 on large sites.

4.17 On the basis of this windfall analysis and for the purpose of 5YHLS calculations, the Council can include 230 dwellings per year on to years 4 and 5 of the 5YHLS period. Note years 1 – 3 of the 5YHLS comprise planned for or established development (in the context of the Tandridge District Council position, ‘planned for’ relates to development already permitted).

#### 4.3.5 Lapsed Permissions

4.18 The supply and completions analysis has identified a number of unimplemented (lapsed) planning permissions (Table 4). The analysis has demonstrated that 2,865 net units have been completed (delivered) since 2013 while 274 net units permitted have lapsed in this time. The level of lapse against completions is therefore <10% and presents a small proportion of the total housing permitted, whilst also demonstrating that the majority of permissioned sites coming forward are being built out.

Monitoring Year	Total Net Units Completed	Net Units Lapsed	Percentage Lapsed
13/14	256	8	3%
14/15	142	13	8%
15/16	322	26	7%
16/17	228	5	2%
17/18	332	10	3%
18/19	244	12	5%
19/20	262	4	2%
20/21	117	47	29%
21/22	238	39	14%
22/23	303	22	7%
23/24*	238	42	18%
24/25	183	46	25%
<b>Total</b>	<b>2,865</b>	<b>274</b>	<b>&lt;10%</b>

TABLE 4: NET NUMBER OF UNITS LAPSED

\* Note that the figures for 23/24 published in the 2023/24 HDTAP differ from the lapsed units set out in Table 3 - this is due to previous errors with the monitoring data and have been rectified in this publication.

4.19 Circumstances that result in the expiration of permission vary and can include unknown site issues or financial collapse of which there is little the Council can

do to reduce this level of lapse rate. In the event that all lapsed permissions had been implemented and completed, the effect on the Council's HDT measure would have been negligible and an action plan would still be required.

#### 4.3.6 Interim Policy Statement for Housing Delivery

4.20 The 2022 iteration of the HDTAP introduced the Interim Policy Statement for Housing Delivery – this policy was adopted at Planning Policy Committee and provides criteria for Development Management to assess planning applications against and determine accordingly. It is an important material consideration in the determination of planning applications. The document expressed support for the proposed allocations included in the 'Our Local Plan 2033' where the Examiner did not raise concerns. Potential sites must also be deliverable and viable: having regard to the provision of any necessary on-site and off-site infrastructure, affordable housing requirements, payment of the Community Infrastructure Levy; and accord with the policies in the adopted development plan.

4.21 Table 5 provides information regarding two sites identified in the IPSHD for a cumulative total of 190 dwellings. Note that the 156-180 Whyteleafe site is split across three permissions and since the previous HDTAP, has been completed in its entirety. Planning permission 2021/2178 has been split into two phases with phase one comprising 60 dwellings that has commenced and seen 11 completions. The remaining units across both phases will contribute to the 5-year housing land supply.

4.22 On the basis of the completions identified, the IPSHD has seen 101 dwellings completed, with 89 dwellings contributing to the District's housing supply.

Site	Capacity	Planning Status	Current Status
156-180 Whyteleafe Road, Caterham	90	2019/1699 - 156 - 170 Whyteleafe Road – 34 dwellings	Complete
		2019/325 - 170 Whyteleafe Road – 14 dwellings	
		2019/1742 - 172 Whyteleafe Road – 42 dwellings	

Land West of Limpsfield Road, Warlingham	100	2021/2178 - Planning permission granted at appeal (APP/M3645/W/22/3309334) for part of the site. Remainder of the site still available.	Commenced – 11 completions
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**TABLE 5: SITES IDENTIFIED IN THE IPSHD WITH PLANNING PERMISSION**

4.23 Table 6 presents the sites that have the potential for delivery as a result of the IPSHD, two of which have agreed S106 terms with one signed and completed and the other awaiting signature, with two further live applications that have yet to be determined. In total the four sites that either have permission or are yet to be determined have the potential to deliver 377 dwellings with the remaining 6 sites anticipated to deliver 482 dwellings. In total, including the full capacity at *Land at Plough Road and Redehall Road, Smallfield and Warren Lane Depot*, the IPSHD has the potential to deliver 962 dwellings of which would contribute to 0.97 years of housing delivery when considered in the context of the 5YHLS.

Site	Capacity	Planning Status	Current Status
Land North of Plough Road, Small Field	120	Planning application 2022/1658 approved at committee on 7/12/23, referred to Secretary of State as a departure; not called in.	Permission granted
Former Shelton Sports Ground, Warlingham	150	Planning application number 2022/267 approved at committee on 7/12/23, referred to Secretary of State as a departure; not called in.	S106 agreed – awaiting signature
Land at Plough Road and Redehall Road, Smallfield	160	Live application at Redehall Road for 85 dwellings – 2024/1389; the site does not include the northern parcel of land, hence the reduction in dwellings.	Yet to be determined
Land to the West of Godstone	150	None	N / A

Land West of Limpstield Road, Warlingham	90	Southern part of site with the northern area granted permission and commenced construction under 2021/2178	N / A
Land west of Red Lane	60	None	N / A
Warren Lane Depot	50	Live application for 22 dwellings at Warren Lane – 2024/155; this site does not include the southwestern parcel of land hence the reduction in dwellings.	Yet to be determined
Land at Green Hill Lane and Alexandra Avenue	50	None	N / A
Land at Farleigh Road	50	None	N / A
North Tandridge One Public Estate	82	None	N / A

**TABLE 6: REMAINING IPSHD SITES**

#### 4.4 Summary

4.24 The analysis sets out the Council's housing delivery to date demonstrating that, when assessed against the housing requirement outlined in the strategic policies of the Core Strategy 2008, the Council were able to exceed this figure. The Council can no longer use this figure to assess housing delivery against the latest position on need following amendments to the NPPF requiring that the LHN is determined via the Standard Method.

4.25 The Standard Method has resulted in a LHN of 827 dwellings pa – this figure does not consider the constraints to development in the District, of which will be addressed as part of the plan review. The use of the Standard Method to determine LHN, as a result of strategic policies exceeding 5 years in age, has implications on the Council's ability to demonstrate a 5YHLS. Due to the Council being unable to deliver housing to reach this figure, for 5YHLS purposes, a 20% buffer is required to be added to the LHN resulting in a requirement of 992 dwellings pa.

4.26 As stated, the Council has consistently delivered housing that has exceeded the provision set out within the Core Strategy, with an average of 247 dwellings delivered per year. It should also be noted that following the increased delivery in the first year of the plan-period (2006/07), the Council's delivery of housing is on an upward trajectory, as demonstrated in figure 1.

4.27 Previous iterations of the 5YHLS and HDTAP acknowledged the contribution windfall development makes towards the Council's housing supply. Following the withdrawal of "Our Local Plan 2033" the Council presented a refined assessment of windfall aligned with the latest policy and guidance in the 2024 HDTAP. This was reflected in the 2024 5YHLS calculation with the 2024 5YHLS forming part of the evidence at a Public Inquiry APP/M3645/W/24/3345915, with both the Council and Appellant in agreement that the Council could not demonstrate a 5YHLS. However, the appellant queried the supply figure presented which included the increased windfall allowance. In his determination, the Inspector did not make a decision on the Council's use of this new windfall allowance or the Council's assessment of this. As such, the Council consider the allowance appropriate to use and will continue to do so in future 5YHLS calculations.

4.28 This has resulted in the inclusion of 229 dwellings to the supply for years 4 and 5 of the 5YHLS period totalling 458 dwellings.

4.29 It should also be noted that there is a low rate of permission lapse signifying that once permission is granted, it is likely that development will be built out, with an average of 10% of total units not coming to fruition.

4.30 As part of the 2022 HDTAP, to increase housing supply and delivery in the District, the Council adopted an Interim Policy Statement for Housing Delivery. The document has the potential to deliver in excess of 1,000 dwellings with 101 dwellings delivered and a further 89 committed as part of application 2021/2178. There are also two OUT permissions that have completed S106 negotiations which can also potentially add to the supply. The IPSHD is also an important material consideration in decision-making.

## 5 Identification of Root Causes of Current Delivery Position

5.1 This section of the report provides context for the Council's housing delivery position and the constraints within the District. The constraints presented are serious and are very real barriers to development, and have heavily restricted the Council's ability to deliver housing against the need determined by the Standard Method:

- **Planning Designations: Green Belt** – the Green Belt extends to some 94% of the district of which development within is heavily restricted with only certain exceptions allowed under para. 154 of the NPPF (December 2024); the Council does have the ability to review the Green Belt under para. 145 and 146 of the NPPF as part of the Local Plan Review, however the Council must demonstrate exceptional circumstances to do so, of which includes instances where an authority cannot meet the identified need for homes, and have the strategy tested during the Local Plan examination. Hitherto, the Green Belt has restricted the Council's ability to deliver the identified housing need, however, the 2024 planning reforms and NPPF update saw the introduction of the Grey Belt; a new land classification within the Green Belt where, when land is identified as Grey Belt and in a sustainable location, development would not be considered inappropriate.
- **Planning Designations: National Landscape** – The Council is also subject to the Surrey Hills and High Weald National Landscapes (covering 12% and 4% respectively) whereby development is restricted under paragraphs 189 and 190 of the NPPF. Furthermore, the district is subject to protections of Area of Great Landscape Value (AGLV) amongst other landscape designations. The extent of the Surrey Hills National Landscape in the Tandridge district is under review and, if further extended, will provide additional constraint on the Council's ability to bring land forward for development.
- **Infrastructure Constraints** – Cumulative impact on infrastructure from historic development. In addition, there have been limited contributions to help alleviate and improve existing infrastructure in and across the district. As work on the withdrawn Local Plan demonstrated, J6 on the M25 is now almost at capacity and increasing problems at key junctions on the A22 which are operating at capacity at peak times are hampering growth both within the district and in surrounding areas. A HIF bid to address the M25 Junction 6 issues was previously submitted. However, this was turned down and no alternative funding source has been identified. It is unlikely that development that has the potential to lead to a severe impact on the junction, will occur.

## 5.2 Local Plan Status

- 5.2 Another key issue that has prevented housing delivery and limits the ability for the Council to adequately plan for development is the status of the Local Plan. The housing requirement in the adopted Core Strategy (2008) is out-dated; consequently, the Council are unable to report their housing delivery against the adopted housing requirement of 125 dwellings per year.
- 5.3 In line with paragraph 78 of the NPPF, where strategic policies are more than 5 years old, the Council is required to test their housing supply against the Local Housing Need established using the Standard Method. This results in a requirement of 827 dwellings to be delivered per year (plus 20% buffer).
- 5.4 As part of the Local Plan review, the Council will determine as its starting point the Local Housing Need over the plan-period using the Standard Method. The Strategic Policies regarding housing delivery will identify the Housing Requirement of which will be the actual number of homes the Council commits to deliver in the Local Plan once due consideration has been taken to major policy constraints and infrastructure capacity.
- 5.5 Until the emerging plan has been through its Regulation 19 consultation and subsequently submitted to the Planning Inspectorate under Regulation 22 (or successor arrangements), no weight can be attached to the emerging policies and consequently the Housing Requirement. It is therefore imperative that there is no delay in the production of the emerging Local Plan.

## 6 Response and Action Plan

6.1 The Council's Housing Delivery Test Action Plan is set out below, responding to the *Housing Delivery Analysis* in Section 4 and on reflection of the *Identification of Causes* set out in Section 5. The action plan demonstrates what the Council has carried out since the previous HDTAP iteration, progress made, and actions going forward:

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Planning Permission	Expedite the S106 process	<p>Negotiations for S106 agreements can take considerable time to resolve of which is preventing the timely delivery of development; reasons for this include: protracted negotiations and process and delays in responses from the County Council.</p> <p>It is therefore necessary to improve the process by introducing various measures that streamline the resolution of the S106 agreement.</p>	HDTAP / 5YHLS / AMR	High	Immediate / ongoing	<p>This remains work in progress – the Council will assess ways in which the process can be streamlined and have identified potential actions to implement:</p> <ul style="list-style-type: none"> <li>- Develop pre-agreed terms creating a set of standard obligations that can be quickly applied to similar projects.</li> <li>- Produce agreement stages to set a timeline early on in the process to have agreements in place.</li> <li>- For smaller projects, Unilateral Undertakings may be used.</li> </ul>

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
						<ul style="list-style-type: none"> <li>- Viability assessments are to be produced early in the process in line with the “pre-agreed” terms.</li> <li>- Clear and detailed guidance may be produced regarding the requirements and expectations for S106 agreements.</li> <li>- A dedicated S106 officer may be employed to specifically negotiate S106 agreements.</li> </ul>
Planning Permission	Impose shorter commencement conditions	<p>The NPPF at paragraph 81 allows for Local Authorities to impose a shorter time period for development commencement.</p> <p>Development is currently not delivering at the rate required to meet the LHN – by reducing the time in which a developer has to commence development, development</p>	HDTAP / 5YHLS / AMR	High	Immediate / ongoing	<p>This has yet to be implemented in full – intended actions:</p> <ul style="list-style-type: none"> <li>- Maintain commencement at 2 years and ensure this is conditioned on all major development permissions</li> <li>- For the purpose of OUT permissions, this shall be reduced to 12 months for a RM app to follow</li> <li>- Regarding OUT permissions,</li> </ul>

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		<p>should be delivered at a faster rate.</p> <p>The IPSHD introduced a reduced time period for planning permission: <i>Planning permission will only be granted for a limited period of 2 years to ensure the rapid development of the sites.</i></p>				<p>developer will be required to provide a timeline for RM and provide evidence of deliverability to comply with the evidence required in the NPPF (deliverability, glossary)</p>
Lapsed Permissions	Assess lapsed permissions	As stated in section 4.3.5, circa. 10% of planning permissions lapse with the numbers significantly increasing since 2020/21 – assessment required to identify sites that may come forward in the future.	AMR / HDTAP	High	Immediate / ongoing	<p>This has yet to be implemented – intended actions:</p> <ul style="list-style-type: none"> <li>- Analyse lapsed permissions to understand reasons for lapse</li> <li>- Contacting the applicant to understand the reasons and to understand whether there is future intention to develop</li> </ul>
Interim Policy Statement for	Delivery of site-specific	Policy statement allows for the delivery of site allocations	AMR / HDTAP /	High	Immediate / ongoing	This action has seen the delivery of circa. 101 units with an outstanding

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Housing Delivery – Continuation Measures from Previous HDTAP iterations	allocations	that were proposed in 'Our Local Plan 2033' where the examiner did not raise concerns – this will be a consideration during the determination of planning applications	5YHLS assessment			supply of 89 to be delivered on sites that are under construction. A further 120 units have been permitted with a further 150 awaiting the signature of the S106 agreement. 167 units are proposed through 3 live applications all at varying stages of the decision-making process. There is potential for the delivery of a further 272 dwellings through the permitting of the remaining allocations.
Interim Policy Statement for Housing Delivery – Continuation Measures from Previous HDTAP iterations	Site-based criteria to assess applications against	In order to boost housing supply, the policy statement provides criteria to assist decision making – this will be a consideration during the determination of planning applications	AMR / HDTAP / 5YHLS assessment	High	Immediate / ongoing	The document was adopted at Planning Policy Committee on 22/09/22 and has been in use since this date – the document is generally relied upon in decision making and has been recognised in the appeal arena as a material consideration in the determination of applications.
Local Plan	Production of	Following the withdrawal of	AMR	High	0 – 3 years	The Council have started work on a

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Review	Local plan	'Our Local Plan 2033' the Council are embarking on the production of a new development plan – this will see the production of a new development strategy and become the starting point in the determination of planning applications.				<p>new Local Plan and published a Local Development Scheme to support this during 2024. Since this time, the government have introduced a number of reforms to the planning system and during December 2024, published an update to the National Planning Policy Framework (NPPF). It is anticipated that the Tandridge Local Plan will be produced under the new system, as set out in the Levelling Up and Regeneration Act (2023) when secondary legislation is enacted, which intends to streamline Local Plan production to 30 months. A new Local Development Scheme has been published (February 2025) which sets out the timetable to meet this requirement.</p>
Local Plan	Evidence base	The Council are currently	AMR	High	0 – 3 years	The Council has begun the

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Review	update	working on a new Local Plan for the district, which includes preparing relevant, accurate and up-to-date evidence to support policy and the delivery of housing and employment land – in regard to the HDTAP, relevant evidence base documents are the HELAA, HEDNA, and Transport Assessments relating to site allocations.				<p>preparation of a new HELAA to identify potential land for housing allocation – the updated methodology was adopted on 27/02/25 with the Call for Sites process producing approximately 290 site submissions of which will imminently undergo further assessment to establish the potential for delivery.</p> <p>The HEDNA is anticipated to be completed by the autumn; the HEDNA will:</p> <ul style="list-style-type: none"> <li>- evaluate the current housing conditions of the district</li> <li>- forecast future need</li> <li>- identify affordability issues</li> </ul> <p>This has the potential to identify issues with housing delivery.</p> <p>Transport assessments will be</p>

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
						carried out for each site allocation that is included in the emerging Local Plan – other stages of assessment will occur during relevant stages of the plan-making process.
Local Plan Review	Duty to Cooperate	Requirement for plan-making - the Council will engage with its neighbours and other prescribed bodies and also engage with Surrey County Council and National Highways in relation to highways matters.	AMR	High	0 – 3 years	The Council is at an early stage in the plan-making process and has started Duty to Cooperate discussions – as this progresses, discussions may need to be held regarding the delivery of housing outside of the district.
Planning Policy	Brownfield Land Register	The Council undertook an update to the Brownfield Land Register during 2024 – the register and locations of brownfield land contained in the register were published during April 2025.	AMR	Medium	Ongoing	Following assessment of the site submissions to review the potential for delivery and to assess whether the sites meet the criteria to be included within the register, 16 sites were included on Part 1 of the BLR. Cumulatively the site area equates to circa. 24.12 hectares with the

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
						<p>potential delivery capacity of 548 dwellings</p> <p>The Council will implement Part 2 of the register under Section 5 (4) (b) of BLR Reg 2017 granting sites automatic Permission in Principle.</p>
Continuation Measures from Previous HDTAP iterations	Planning Performance Agreements	The Council has implemented the use of PPAs to ensure the prompt consideration of planning applications for new housing and to ensure that specialist consultancy services are at hand to enable the Council to determine applications in a prompt manner.	HDTAP	Medium	Ongoing	Planning Performance Agreements have started to be used with a view to expedite the application process and increase housing delivery; their effectiveness will be monitored to ascertain the success of delivery when they are used
Continuation Measures from Previous HDTAP iterations	Pre-Application Services	The Council has re-commenced pre-application consultation services as of October 2021 to assist developers in bringing forward	HDTAP	Medium	Ongoing	Previous iterations of the HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		suitable sites for housing development and enhance the speed at which applications can be dealt with. The Council will continue to fund this service as part of its objective to encourage further housing development in the district.				these.
Continuation Measures from Previous HDTAP iterations	Public Sector Role	Historically the Council had a limited role to bring forward housing. However, in recent years, the Council has begun to realise its aspiration to deliver its own homes and is now actively promoting and delivering a council-housebuilding programme – the original council house building programme commenced in 2015 and consisted of 142 units; there	HDTAP	Medium	Ongoing	<p>The current house building programme has approval for a further 200 units:</p> <ul style="list-style-type: none"> <li>- 5 are completed acquisitions</li> <li>- 17 are currently under construction</li> <li>- 16 are in contract</li> <li>- 10 are out to tender</li> <li>- 38 are awaiting planning approval</li> <li>- 60 have housing committee approval and are being</li> </ul>

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		have been 116 completions to date including 10 buybacks with the final 26 units due to complete in June.				<p>prepared for planning stage</p> <ul style="list-style-type: none"> <li>- 19 are on land currently being acquired</li> <li>- 30 are yet to be confirmed</li> <li>- The Council are currently forecasting completion of the 200 units by Qtr 4 of 2029/30.</li> </ul> <p>In addition to the above the Council has also participated in all three rounds of the Local Authority Housing Fund to date. This has seen the acquisition of 14 buybacks since the scheme commenced in May 2022 and there are a further 4 due to complete in the next few months. The LAHF fund is also financing the conversion of some former communal lounges and laundries into 7 new properties for rent (including 5 that will be accessible for wheelchair</p>

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
						users). These are due for completion by the end of the year.
Continuation Measures from Previous HDTAP iterations	Public Sector Role	On 15 January 2019 members of the Housing Committee adopted the Council's Housing Strategy 2019-2023.	HDTAP	Medium	Ongoing	The Council intend to update the Housing Strategy during the 2025/26 financial year.
Continuation Measures from Previous HDTAP iterations	Public Sector Role	The Council's Strategic Asset Management team are leading on building and managing the Council's property portfolio and delivering housing development.	HDTAP	Medium	Ongoing	The Council has now completed three land acquisitions to facilitate the council house building programme and continues to seek opportunities to acquire land for this purpose, with a focus on surplus land held by other public bodies.

## 7 Glossary

**Affordable Housing:** Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).

**Air quality management areas:** Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

**Ancient or veteran tree:** A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

**Ancient woodland:** An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

**Annual position statement:** A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.

**Archaeological interest:** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

**Area of Great Landscape Value (AGLV):** Land designated under the Town and Country Planning Act 1947 and considered to be of high landscape quality with strong distinctive characteristics which make them particularly sensitive to development.

**Areas of Outstanding Natural Beauty (AONBs):** Land protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty. It is areas of countryside that have been designated for conservation due to their significant landscape value.

**Article 4 direction:** A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

**Authority Monitoring Report :** The Authority Monitoring Report (AMR) is a mechanism used to assess the performance and effects of planning policies set out

in the local development plan. It reviews the effectiveness of these policies and ensures progress towards achieving the objectives outlined in the plan.

**Best and most versatile agricultural land (BMVAL):** Land in grades 1, 2 and 3a of the Agricultural Land Classification.

**Brownfield land:** See Previously developed land.

**Brownfield Land Register (BLR):** Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

**Build to Rent:** Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

**Built-up Area:** Area that is urban in character having the presence of buildings and road network, characteristics of cities, towns and villages.

**Call for Sites:** An information gathering consultation exercise which gives landowners, developers, agents, site promoters and other interested parties an opportunity to suggest potential sites for development within the Council area.

**Climate change adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

**Climate change mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

**Coastal change management area:** An area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

**Community forest:** An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.

**Community Infrastructure Levy (CIL):** The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.

**Community Right to Build Order:** An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site- specific development proposal or classes of development.

**Community-led developments:** A development instigated and taken forward by a not- for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.

**Competent person (to prepare site investigation information):** A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

**Conservation (for heritage policy):** The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Decentralised energy:** Local renewable and local low carbon energy sources.

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered

within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Design code:** A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

**Design guide:** A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

**Designated heritage asset:** A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

**Designated rural areas:** National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985.

**Developable:** 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 be viably developed at the point envisaged.

**Development plan:** Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

**Development Plan Documents:** A statutory document or documents that contain the policy framework for planning decisions. This typically includes the Local Plan, Neighbourhood Plans, Waste Local Plan and Minerals Local Plan.

**Duty to Cooperate:** The duty to cooperate is a legal requirement that mandates collaboration between local planning authorities and other public bodies. Its purpose is to enhance the effectiveness of policies related to strategic matters in Local Plans.

**Edge of centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Environmental impact assessment:** A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

**Essential local workers:** Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.

**Five-Year Housing Land Supply (5-YHLS):** A mechanism for development and forward-looking measure that assesses whether a Local Planning Authority has sufficient sites to meet its housing requirement over the proceeding five years.

**Flood Risk:** A combination of the probability and the potential consequences of flooding. Areas at risk of flooding are those at risk of flooding from any source, now or in the future. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources.

**Flood zones:** Guidance tools created by the Environment Agency which differentiate areas based on the likelihood of an area flooding from rivers or seas. The zones are Flood Zones 2 and 3 or where a Strategic Flood Risk Assessment shows it will be at risk of flooding in the future. It can also include an area within Flood Zone 1 which the Environment Agency has notified the local planning authority as having critical drainage problems.

**General aviation airfields:** Licenced or unlicenced aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.

**Geodiversity:** The range of rocks, minerals, fossils, soils and landforms.

**Geographic Information System (GIS):** A computer system that connects geographical data to a map. It captures, stores, manipulates, analyses, manages, and presents all types of data that is in some way referenced to locations on the earth.

**Green Belt:** National Policy that was introduced with the aim to control urban growth, preventing urban sprawl and to protect natural landscapes. Development in the Green Belt is heavily restricted and protected by National Policy with certain exceptions allowing for development to occur.

**Green Infrastructure:** A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

**Gypsy and Traveller and Travelling Showpeople:** Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

**Habitats site:** Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Heritage coast:** Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

**Historic environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Historic environment record:** Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

**Housing Delivery Test:** Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England annually.

**Housing Delivery Test Action Plan:** A Housing Delivery Test Action Plan is produced by a local planning authority when the results of the housing delivery test falls below 95% of the housing requirement. The plan assesses the causes of under-delivery and outlines measures to improve future delivery.

**Housing Requirement:** The assessment of how much new housing is needed to accommodate growth in a specific area. The standard method for calculating local housing need provides a minimum number of homes to be planned for, and authorities use this as a starting point when preparing their housing requirement in the plan.

**International, national and locally designated sites of importance for biodiversity:** All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

**Irreplaceable habitat:** Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

**Local Development Order:** An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

**Local Development Scheme:** As required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended), the LDS specifies the development plan documents, including their content and timing and sets out the council's work program for updating these documents.

**Local Enterprise Partnership:** A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

**Local Housing Need (LHN):** The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

**Local Nature Partnership:** A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

**Local Planning Authority:** The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

**Local Plan:** A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Major development:** For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Major hazard sites, installations and pipelines:** Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

**Mansard roof:** A type of roof that is characterised by two slopes, the lower steep and the upper shallow. It is generally regarded as a suitable type of roof extension for buildings which are part of a terrace of at least three buildings and at least two stories tall, with a parapet running the entire length of the front façade (reference: Create Streets, 2021, Living Tradition).

**Minerals resources of local and national importance:** Minerals which are necessary to meet society's needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), coal derived fly ash in single use deposits, cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.

**Mineral Consultation Area:** A geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

**Mineral Safeguarding Area:** An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.

**National Landscape:** A National Landscape is a designated exceptional landscape whose distinctive character and natural beauty are protected and enhanced for nature, people, business, and culture and comprise National Parks and Areas of Outstanding Natural Beauty.

**National Planning Policy Framework (NPPF):** Published by Government in March 2012 and last updated in December 2023. It contains national policy guiding the preparation of Local Plans and is a material consideration in planning decisions.

**National Planning Policy Guidance (PPG):** Published by Government in March 2012 and regularly updated since. It contains national guidance to aid interpretation and application of national policy contained in the NPPF. It sets out the process for preparing Local Plans and is a material consideration in planning decisions.

**National trails:** Long distance routes for walking, cycling and horse riding.

**Natural Flood Management:** Managing flood and coastal erosion risk by protecting, restoring and emulating the natural ‘regulating’ function of catchments, rivers, floodplains and coasts.

**Nature Recovery Network:** An expanding, increasingly connected, network of wildlife- rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

**Neighbourhood Development Order:** An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

**Neighbourhood Plan:** A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

**Non-strategic policies:** Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

**Older people:** People over or approaching retirement age, including the active, newly- retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

**Open space:** All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

**Original building:** A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

**Out of centre:** A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Out of town:** A location out of centre that is outside the existing urban area.

**Outstanding universal value:** Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

**People with disabilities:** People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

**Permission in principle:** A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

**Planning condition:** A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

**Planning obligation:** A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

**Plan Period:** A plan period refers to the duration during which a local plan is in effect and generally covers a 15-20 year period. Note that Local plans are reviewed every five years to assess whether they need updating based on changing circumstances and national policy changes.

**Playing field:** The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Previously developed land:** Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

**Primary shopping area:** Defined area where retail development is concentrated.

**Priority habitats and species:** Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

**Ramsar sites:** Wetlands of international importance, designated under the 1971 Ramsar Convention.

**Renewable and low carbon energy:** Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

**Rural Exception Site:** Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion

of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

**Recycled aggregates:** Aggregates resulting from the processing of inorganic materials previously used in construction, e.g. construction and demolition waste.

**S106 agreement:** A legal agreement between a planning authority and a developer that ensures certain extra works related to a development are undertaken in order to mitigate the impact of development.

**Safeguarding zone:** An area defined in Circular 01/03: Safeguarding aerodromes, technical sites and military explosives storage areas, to which specific safeguarding provisions apply.

**Secondary aggregates:** Aggregates from industrial wastes such as glass (cullet), incinerator bottom ash, coal derived fly ash, railway ballast, fine ceramic waste (pitcher), and scrap tyres; and industrial and minerals by-products, notably waste from China clay, coal and slate extraction and spent foundry sand. These can also include hydraulically bound materials.

**Self-build and custom-build Housing:** Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

**Setting of a heritage asset:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

**Significance (for heritage policy):** The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

**Special Areas of Conservation:** Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

**Special Protection Areas:** Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

**Site investigation information:** Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites – Code of Practice).

**Site of Special Scientific Interest:** Sites designated by Natural England under the Wildlife and Countryside Act 1981.

**Spatial development strategy:** A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

**Stepping stones:** Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

**Strategic environmental assessment:** A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

**Strategic policies:** Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

**Strategic policy-making authorities:** Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

**Supplementary planning documents:** Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainable transport modes:** Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.

**Town centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

**Transport assessment:** A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

**Transport statement:** A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.