

Housing Delivery Test Action Plan

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1. Introduction

Background

- 1.1 In response to the national ‘Fixing our broken housing market’¹, the Government has demonstrated its commitment to improve the delivery of housing through various programmes which alter the planning system and support an increase in house building. Local planning authorities are responding to these challenges by assessing the issues that are limiting their ability to boost housing land supply and housing delivery, to meet the needs of their local areas.
- 1.2 The ‘Housing Delivery Test’ (HDT) is an initiative that the Government introduced to measure current delivery and encourage an increase in housing development nationally. It is included as part of the revised National Planning Policy Framework (NPPF) (February 2019)². The HDT is a percentage measurement of the net number of homes delivered against the number of homes required³ by the Government in accordance with set criteria and within the area of relevant plan-making authorities.
- 1.3 The HDT was introduced in November 2018 by the Ministry for Housing, Communities and Local Government and results of the test will be published on an annual basis. The consequences of not meeting the HDT are set out in the revised NPPF. All local planning authorities that deliver less than 95% of their housing requirement over the previous three years, are required to produce an Action Plan in line with Paragraph 75 of the NPPF (2019) and in accordance with the guidance set out in national planning practice guidance⁴. As the adopted housing requirement figure for Tandridge District Council is more than five years old, the ‘minimum local housing need figure’ (defined by Government in the HDT) will be applied.
- 1.4 On 19 February 2019 the results of the HDT were published for all relevant local planning authorities. Tandridge District Council were identified as having delivered 65%⁵ of the required level and in accordance with the process, must produce an Action Plan and add a 20% buffer onto the Five-Year Housing Land Supply. This is most relevant for the purposes of the Council’s current assessment of planning applications through the decision-making process and is an interim consideration until such time as the Council adopt its revised Local Plan. The Councils Local Plan: 2033⁶ was submitted to the Planning Inspectorate for examination on 18 January 2019 and will result in a change to its housing requirement targets. Once adopted the Councils Local Plan will set an up to date and locally appropriate delivery target against which delivery can be assessed and provide the basis for planning decisions for the District in future years. This will be explored further in Section 4 of this Action Plan.

¹ [Department for Communities and Local Government, Fixing our broken housing market](#), Introduction, Page 9,

² [National Planning Policy Framework \(NPPF\) \(February 2019\)](#)

³ Where the latest adopted housing requirement figure is less than five years old, the figure will be the lower of the latest adopted housing requirement figure or the minimum annual local housing need figure. Where the adopted housing requirement is more than five years old, the minimum annual local housing need figure will apply.

⁴ [National Planning Practice Guidance \(NPPG\) \(2019\)](#)

⁵ [Housing Delivery Test: 2018 measurement](#)

⁶ [Our Local Plan: 2033](#)

Purpose, objectives and status

- 1.5 The purpose of this Action Plan is to address and analyse the key reasons as to why the delivery of housing falls below the rate set by Government and to identify the measures the Council intend to take to increase the delivery of new housing in Tandridge.
- 1.6 The Council is already being proactive in its approach to housing delivery in the preparation of an up to date Local Plan which responds to the changing needs of the community and will ensure that suitable homes and infrastructure are in place to benefit all residents. The commitment to housing delivery is also supported through the Council's objectives and Tandridge Council has already become more active in delivering its own homes for the benefit of the area. This Action Plan will aim to increase delivery in a way that is locally appropriate and specific using the Council's existing strategies and role in the District.
- 1.7 This is the Council's first Housing Delivery Action Plan and will act as a material planning consideration in the assessment of planning applications where relevant.

Relationship to other plans/strategies and council activities

- 1.8 The Action Plan is informed by a range of other existing Council strategies and activities that aim to encourage housing and economic growth. These include:

- **Our Local Plan: 2033⁷** – Our Local Plan is a key document that has been prepared which sets out the development strategy for the District up to 2033 in accordance with national policy, guidance and evidence. Our Local Plan: 2033 was submitted to the Planning Inspectorate on 18 January 2019 and the Examination in Public is expected in Autumn 2019.
- **Infrastructure Delivery Plan (IDP)⁸** – The IDP is a living document which supports the objectives outlined in Our Local Plan: 2033 and provides detail on infrastructure needs within the District to support new development. The IDP sets out estimated costs associated with each infrastructure project/programme.
- **Housing Strategy 2019-2023⁹** – The Housing Strategy sets out the Council's vision and plans for housing for the next five years. It identifies the challenges the Council face 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.
- **Corporate Delivery Plan 19/20¹⁰** – The key corporate objectives are delivered through our Corporate Delivery Plan which is agreed annually by Members and with the involvement of committees. The Delivery Plan sets out the projects and programmes the Council will deliver in order to achieve the key corporate objectives. The Delivery Plan also sets performance indicators and risks, so the Council can monitor how they are delivering their services. A key element of the Corporate Delivery Plan is to progress and adopt the Local Plan and ensure the schemes set out in the IDP are implemented where improvements to infrastructure are required.

⁷ [Our Local Plan: 2033](#)

⁸ [Infrastructure Delivery Plan \(January 2019\)](#)

⁹ [Tandridge Housing Strategy 2019-2023](#)

¹⁰ [Corporate Delivery Plan 2019/2020](#)

- **South Godstone Garden Community Further Analysis of Tandridge District Council's Delivery Options (June 2019)¹¹ and associated documents** – The Council commissioned Avison Young to advise on the delivery of the South Godstone Garden Community that is being pursued in Our Local Plan: 2033. This further delivery options analysis document is a follow up to the Delivery Options note which was taken to the Strategy and Resources Committee on 11 December 2018. This document explores in more detail the Council's initial preferences around delivery of the South Godstone Garden Community.

Approach and Methodology

- 1.9 This Action Plan reviews the work the Council currently undertakes as part of the Authority's Monitoring Report (AMR) and annual update on the housing land supply position. In addition, it has been prepared on reflection of the guidance set out nationally in the PPG and in the context of the historic trends and characteristics of permission and delivery for the District where relevant. Through this regular monitoring the Council has an understanding as to the key challenges that face housing delivery in Tandridge. This comes from analysing the historical nature of, and progress on, permissions for housing and identifying general and site-specific delivery challenges.
- 1.10 There is regular contact between the Council and land owners / developers on larger sites to review progress and inform the Council's understanding as to the build out and supply rates of sites and housing delivery. This has been conducted as part of the need to assess site suitability through the Housing and Economic Land Availability Assessment (HELAA) and to inform the preparation of the Local Plan. Although this is not expected, should the Council be required to prepare Action Plan's in future years, action will be taken to actively seek the specific input of developers and other professionals to explore and better consider any potential barriers to delivery which the Action Plan could have regard to and seek to resolve where necessary.
- 1.11 The preparation of this Action Plan falls at a time where the Council has an outdated Core Strategy but is well advanced in the examination of its Local Plan which will set a revised and appropriate housing delivery target. The Government HDT figure is policy off and has no regard for key constraints to development such as Green Belt and AONB. At this time, it is understood that the Council's ability to meet the HDT figure is not reasonable, not least because 94% of the land area for the District is designated as Green Belt and in the absence of the consideration of constraints, presents an inaccurate view of the realities of housing delivery for Tandridge District. The Council has carried out a thorough plan-making exercise which will see an increase in the base level of housing delivery from the current Core Strategy figure and is a figure which is locally appropriate to the constraints of the area. On adoption of the Local Plan, the HDT figure will be replaced with the up to date delivery target and will provide a more accurate housing position.

¹¹ [South Godstone Garden Community Further Analysis of Tandridge District Council's Delivery Options \(June 2019\)](#)

Scope of Report

1.12 The following matters will be addressed in this Action Plan:

- Housing Delivery Analysis
- Identification of Root Causes of Current Delivery Position
- Responses and Action Plan
- Project Management and Monitoring Arrangements

2. Housing Delivery Analysis

Local Planning Context

- 2.1 Tandridge District is the furthest eastern Local Authority in Surrey. Tandridge hosts key strategic transportation infrastructure, including London's Orbital M25 running east to west and the M23 running north to south along the western boundary. The A25 and A22 run mainly central through the District. The District is well-served by rail with 11 railway stations and located within a few miles of Gatwick Airport to the south-west of the District border.
- 2.2 There are two Areas of Outstanding Natural Beauty (AONB) in the District: Surrey Hills in the north and High Weald in the south-east. The District has a long-standing history of having the highest percentage (94%) of Green Belt of any authority in England. It also has numerous landscapes valued for their biodiversity, including Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Biodiversity Opportunity Areas (BOA).
- 2.3 The Council currently has an adopted Core Strategy¹² which was adopted in October 2008 and includes a housing requirement target of 125 dwellings per year to be built until 2026. Subsequently the Local Plan Part 2 – Detailed Policies¹³ was adopted in July 2014. It contains a suite of development management policies to assist in the assessment of planning applications.
- 2.4 On 18 January 2019, the Council submitted Our Local Plan: 2033¹⁴ to the Planning Inspectorate for examination. Our Local Plan has been prepared in accordance with the National Planning Policy Framework (2012) and accompanying Planning Practice Guidance (PPG)¹⁵. The adoption of Our Local Plan: 2033 will fully replace the policies contained within the Core Strategy and will partially replace those contained in the Local Plan Part 2 – Detailed Policies. The publication version¹⁶ makes the provision for 303 dwellings per year within the Plan period to 2033, this amounts to a 142% increase in housing delivery against the previously adopted plan.

Current Housing Supply Needs and Delivery

- 2.5 Housing delivery is monitored in the Council's Authority Monitoring Reports (AMR)¹⁷. The AMR and housing land supply position has historically been assessed against the policies contained in the Core Strategy (2008), including against the housing requirement of 125 dwellings per year. The Council has consistently met and exceeded against the Core Strategy target. Table 1 illustrates the net number of homes that have been delivered since 2006.

¹² [Tandridge District Core Strategy \(2008\)](#)

¹³ [Tandridge Local Plan Part 2: Detailed Policies \(2014-2029\)](#)

¹⁴ [Our Local Plan: 2033 \(Regulation 22 submission\) January 2019](#)

¹⁵ [National Planning Policy Framework \(2012\) and accompanying Planning Practice Guidance](#)

¹⁶ In this context, the publication version relates to the Our Local Plan: 2033 which accords with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) (2012)

¹⁷ [Authority's Monitoring Reports](#)

Table 1: Annual Net Dwellings Completed ¹⁸		
Year	Net Completion 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

2.6 Although the target has been met in accordance with the Core Strategy, the revised NPPF 2019 and accompanying requirements of the HDT require that adopted housing requirements that are more than five years old are to be measured against the Government assessed 'local minimum housing need' figure. This figure does not have regard to local constraints to development such as those identified consistently through each iteration of the NPPF, including Green Belt. Consequently, Tandridge is judged as underperforming in terms of housing delivery.

Table 2: Permitted Sites Fewer than 10 units (Gross)									
Year of Permission	Status	Number of Applications	Number of Units	Average Site Size (ha)	Dwelling Type (Houses, Flats)	1 bed	2 bed	3 bed	4+ bed
2013/14	Completed	55	115	0.4	93H, 22F	13	24	28	50
	Permissioned	5	8	0.2	8H, 0F	3	0	3	2
2014/15	Completed	58	125	0.2	80H, 45F	10	44	19	52
	Permissioned	10	28	0.5	26H, 2F	2	1	9	16
2015/16	Completed	46	69	1.8	38H, 31F	13	22	11	23
	Permissioned	24	52	0.3	37H, 15F	6	17	11	18
2016/17	Completed	33	72	0.4	69H, 3F	0	14	30	28
	Permissioned	48	91	0.5	64H, 27F	10	24	21	36
2017/18	Completed	11	28	0.4	23H, 5F	0	20	3	5
	Permissioned	64	148	0.4	103H, 45F	23	43	26	56
2018/19	Completed	2	4	0.1	1H, 3F	0	2	1	1
	Permissioned	66	232	0.2	123H, 107F	64	79	64	25
Total		422	972	0.45	665H, 305F	144	290	226	312

¹⁸ This table has been taken from the AMR (2018) and updated to take into consideration the most up to date figures. This table will be published as part of the AMR (2019) once finalised.

Table 3: Permitted Sites Greater than 10 units (Gross)									
Year of Permission	Status	Number of Applications	Number of Units	Average Site Size (ha)	Dwelling Type (Houses, Flats)	1 bed	2 bed	3 bed	4+ bed
2013/14	Completed	6	158	0.3	38H, 120F	85	55	18	0
	Permissioned	1	17	0.9	17H, 0F	0	0	17	0
2014/15	Completed	6	99	0.5	22H, 77F	38	39	11	11
	Permissioned	1	11	0.6	11H, 0F	0	0	6	5
2015/16	Completed	7	131	1	104H, 27F	47	60	15	9
	Permissioned	1	36	2.8	36H, 0F	12	24	0	0
2016/17	Completed	3	62	0.5	10H, 52F	4	54	4	0
	Permissioned	4	90	1.1	30H, 60F	12	42	16	20
2017/18	Completed	2	35	0.3	19H, 16F	11	18	6	0
	Permissioned	6	195	0.4	29H, 166F	74	115	0	6
2018/19	Completed	0	0	0	0	0	0	0	0
	Permissioned	6	181	0.3	36H, 145F	29	109	43	0
Total		43	1015	0.725	352H, 663F	312	516	136	51

Action Plan – Key Point: The Council has consistently met and exceeded delivery targets set out in the adopted plan.

Typology of Sites

2.7 From the data above and from what is evident from the past AMRs, Tandridge has a history of housing development on predominantly small sites. The analysis of past completions and current supply identifies that most applications coming forward and being delivered are of under 10 units. These equated to 422 applications out of a total of 465 (91%). For sites accommodating under 10 dwellings, the average site size is 0.45 hectares. Small sites will continue to be a significant contribution to the housing land supply coming forward in Tandridge.

2.8 The majority of small sites that are coming through the planning process are windfall development and therefore a windfall allowance can be made for future housing supply coming forward. This is confirmed in Table 4 below which shows that a total of 401 residential dwellings have been completed since 2006-2019 at an annual average of 31 units. Although, it should be noted that the total small windfall completions from 2006-2019 is 672 dwellings which is an average of 51 dwellings. However, due to the change of Government definition of windfall, the NPPF¹⁹ is clear that residential back gardens cannot be included within this figure and therefore these have been deducted from the total. Historically, a significant contribution to the housing supply has come from residential garden land and as a consequence what has been delivered is not accurately reflected in official figures.

¹⁹ NPPF (2019) Paragraph 70

Table 4: Small Site Windfall Completions (sites of 4 and under) between 2006 and 2019			
Year	Total Small Site Windfall Completions	Total Small Site Windfall Completions on Residential Garden Land	Total Small Site Windfall Completions Excluding Residential Garden Land
2006/2007	53	19	34
2007/2008	51	26	25
2008/2009	40	17	23
2009/2010	46	21	25
2010/2011	37	16	21
2011/2012	39	12	27
2012/2013	64	31	33
2013/2014	82	41	41
2014/2015	38	20	18
2015/2016	66	33	33
2016/2017	18	10	8
2017/2018	78	18	60
2018/2019	60	7	53
Average	52	21	31

2.9 Based on the above, it is considered highly likely that this consistent rate of delivery from small windfall sites will continue to play a role in meeting the District’s housing requirement. Therefore, an average windfall allowance has been allocated as a separate source of supply within the Local Plan housing trajectory in Appendix 1.

2.10 Of the small sites coming forward, it is evident that the types of housing being delivered are larger homes of 4+ bedrooms. Small sites coming forward since the start of the Plan period show that 312 homes out of a total of 972 (32%) are 4+ bed homes. As a consequence, this is having a direct impact on the accessibility, affordability, number and the speed to which homes are being built out.

2.11 In comparison, larger sites above 10 units are proving to deliver a higher number of units proposing 1 and 2 bed flats. Although this is a positive representation of applications coming forward for tackling issues with housing delivery, the amount of applications for schemes on larger sites coming forward are significantly less to the amount on small sites. This again is limiting the potential for higher and faster rates of housing delivery.

2.12 The typology of sites for the District are well matched with the nature of the area which is highly constrained both in environmental terms; due to factors such as flooding and national landscape designation, as well as policy constrained through significant (94%) Green Belt designation. These constraints, coupled with low housing targets previously set by now defunct Regional Spatial Strategies, has very much determined the trend for sites and the ways in which these have come forward. Large scale development has never been required in Tandridge and previous planning regimes have been more reflective of the constrained nature of the District, as opposed to the policy-off housing needs of the population. As such, land availability in the District for planned large sites has not been necessary and inevitably provides an obstacle to the Council in meeting government determined figures.

2.13 All these matters have been a focus in the preparation of the Council’s emerging Local Plan which seeks to recognise the constraints of the District and support a more appropriate mix and tenure of housing development. The Local Plan sets policies and a strategy which is reflective of local need, demographics and the high-quality landscape and environment across the area.

Action Plan – Key Point: Land is not readily available for development due to previous planning regimes and high level of constraint.

Speed of Housing Development

2.14 The tables below present the average time housing development is taking from the point of planning permission to commencement, commencement to completion and ultimately from permission to completion. This data is taken from completion records since the start of the Plan period.

Table 5: Completed Sites Fewer than 10 Units (Gross)				
Year of Permission ²⁰	Number of Units	Average Days from Permission to Commencement	Average Days from Commencement to Completion	Average Days from Permission to Completion
2013/14	115	431	543	966
2014/15	125	435	611	974
2015/16	69	270	610	729
2016/17	72	265	476	680
2017/18	28	153	428	553
2018/19	4	-	-	129
Average		310.8	533.6	671.8333333

²⁰ Figures taken from applications that have been given planning permission in a given year and completed.

Table 6: Completed Sites Greater than 10 Units (Gross)				
Year of Permission	Number of Units	Average Days from Permission to Commencement	Average Days from Commencement to Completion	Average Days from Permission to Completion
2013/14	158	501	894	1320
2014/15	99	349	608	870
2015/16	131	279	455	728
2016/17	62	228	439	667
2017/18	35	89	399	486
2018/19	0	-	-	-
Average		289.2	559	814.2

2.15 The tables above demonstrate that small sites (of less than 10 dwellings), take on average 672 days (around 22 months) to complete from date of permission. Large sites (of 10 dwellings or more) take on average 814 days (around 27 months). Although there are circumstances where some developments are taking longer to complete due to such things as planning conditions attached to the applications, S106/CIL contributions and issues during construction. On an average basis the data above indicates that the speed of delivery once a site is permissioned is not a cause of concern. The rate of delivery will also be further supported through the emerging Local Plan which allocates sites for housing development, including through the release of land from the Green Belt, and will increase the supply of development land for homes.

Action Plan – Key Point: Speed of delivery in the District does not present an obstacle.

Lapsed Sites

2.16 Through the analysis process, unimplemented (lapsed) planning permissions were identified. From the analysis, 1524 net units have been delivered since 2013²¹ and of those delivered 27 net units have lapsed (2%). This is a very small proportion of the total housing permitted. It demonstrates that the majority of permissioned sites coming forward are being built out. This reflects a generally high level of housing market viability and also a period of national and local housing market buoyancy. Lapses arise from a few very particular circumstances, such as where an unknown issue is discovered on site, or financial collapse of a developer, and there is little the Council can do to reduce this marginal level of lapses.

2.17 From Appendix 1, Tandridge has 1,097 amount of committed sites²² expected to come forward in the next 5 years. In discussion with applicants, as part of the Councils monitoring functions where the Council have been notified where sites have complex matters that may hinder delivery at a quicker rate, these sites will continue to be monitored and the position on the timescale until delivery will be updated where necessary. The Council maintains regular contact with the site promoters involved as part of its housing monitoring work.

²¹ Figure taken from Table 1 above. 2013/14 – 2018/19

²² Figure taken from Appendix 1 – Permissions (up to expiry)

2.18 Some sites have been removed from the Local Plan trajectory (Appendix 1) even though planning permission exists. In these instances, the Council has evidence to believe that these sites are unlikely to come forward at all or within the 3-year timeframe where planning permission exists. Appendix 2 lists the sites (89 units) that the Council has removed from the total commitments that is featured in the proposed Our Local Plan: 2033 trajectory.

Action Plan – Key Point: The Council has low levels of lapsed sites and the vast majority of sites permitted are developed.

2.19 In summary, the analysis set out in this section shows that delivery of homes in the District is not an issue. Whilst the Council is not performing against the Government's HDT in accordance with their standards, this is justified due to constrained land and the availability of planned sites, this is explored further in Section 3. Through the Council's emerging Local Plan, additional land will be made available for development at a scale and type reflective of local circumstances.

3. Identification of Root Causes of Current Delivery Position

Historic Restraint Based Planning

3.1 As previously noted, Tandridge is a predominantly rural District that is significantly constrained. Paragraph 11 and footnote 6 of the NPPF (2019)²³ sets out a number of constraints that must be a consideration for local planning authorities in determining its ability to meet local development needs. Many of those factors listed exist in the area.

Green Belt

3.2 The NPPF (2019)²⁴ follows the policy of earlier government policies and continues to give a high protection to land designated as Green Belt. NPPF Paragraph 133 states:

133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Other Constraints

3.3 In addition to Green Belt, the District also contains significant environmental and landscape constraints including two Areas of Outstanding Natural Beauty (AONB), over 250 Sites of Nature Conservation Importance (SNCI) and multiple Sites of Special Scientific Interest (SSSI). The District is also rich in heritage with over 600 buildings and assets of historic interest including more than 20 Grade I listed buildings, two parks and gardens of historic interest, 19 conservation areas and over 250 areas of Ancient Woodland.

3.4 These factors, coupled with areas of significant flooding, make it inevitable that the Council will struggle to meet development needs in full. Previous planning regimes, such as Regional Spatial Strategies, have been cognisant of these issues and recognised that these constraints cause land capacity issues by allocating historically modest housing targets more in keeping with the character and nature of the area, as opposed to pure demographic need. This factor change in the Government's approach has resulted in a significant increase between what earlier plans have been required to meet and the expectations of the current planning system.

Infrastructure Constraints

3.5 The approach to development in the Core Strategy was to focus on the main built-up areas in the District. However, the settlement boundaries were tightly defined by the Green Belt and this has effectively served to prevent their outward expansion. The lack of need to provide strategic levels of housing allocations has resulted in piecemeal and unplanned development that whilst being in keeping with required levels of need, has cumulatively impacted upon infrastructure and failed to sufficiently off-set the impact of such development.

3.6 In planning terms, the level of development seen in Tandridge has not provided the justification to infrastructure providers for them to take notable steps in forward planning for additional services and facilities. Instead, and in accordance with their own pressures,

²³ [NPPF \(2019\)](#) Paragraph 11, footnote 6

²⁴ [NPPF \(2019\)](#) Paragraph 133

infrastructure providers have considered development in Tandridge, on a site-by-site basis and with developments predominantly being of less than 10 units, are often led with no choice but to assume that existing facilities can absorb the pressures of development. In addition, there have been quite limited CIL and S106 contributions to help alleviate and improve existing infrastructure in and across the District.

3.7 Over time, however, this has led to a cumulative impact which has resulted in deficiencies in capacity of the infrastructure for communities and businesses. Infrastructure provision is a key driver in the preparation of the Council's Local Plan, which will unlock land not just for homes, but also in a planned manner and at a level that has and is requiring close working with infrastructure providers which will be essential in allowing delivery to come forward and at an increased rate.

Housing Development Profile

3.8 Tandridge has a history of providing larger homes in its housing stock. This is evident in the latest Strategic Housing Market Assessment (SHMA)²⁵ update 2018. Table 7 is taken from the study and compares the number of bedrooms across Tandridge and wider Surrey.

	1 bed	2 beds	3 beds	4+ beds	Unknown
Tandridge	9%	27%	37%	24%	3%
Surrey	11%	25%	39%	22%	3%
South East	12%	27%	41%	18%	3%
England	12%	28%	43%	15%	2%

3.9 From Table 7 above, it is clear that the predominant housing types are larger homes with around a quarter (24%) of all homes in the District containing at least four bedrooms, surpassing levels recorded in Surrey, the South East and England. Smaller one bed properties continue to be significantly lower in comparison to larger homes and this limits the housing mix in the District to the detriment of appeal to all residential needs and affordability.

3.10 Alongside the Local Plan, the Council's Housing Strategy 2019-2023²⁷ is a key document to help deliver a wider mix, tenure and type of housing in the District. The Housing Strategy acknowledges the disproportionate amount of larger homes and the effect this has to unlock opportunities for households to downsize to smaller properties as their need changes, whilst simultaneously impacting on the availability of larger homes for growing families.

3.11 The housing mix in the District has a direct impact on the nature of the housing market, the type of demand and the rate of delivery. It also impacts on the amount of supply in the pipeline. The continuous building of larger homes is limiting the potential for higher, faster rates of housing delivery coming forward within a shorter time period. The profile of sites, with small urban infill predominantly reinforces this.

²⁵ [Tandridge SHMA 2018 – Addressing the Needs of All Household Types](#)

²⁶ Tandridge SHMA 2018 page 10

²⁷ [Tandridge Housing Strategy 2019-2023](#)

Public Sector Role

3.12 A contributing factor to the lack of housing mix in the District is the historically limited role the Council has previously had to bring forward housing. That said, over the past few 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.

3.13 The Corporate Delivery Plan 2019/20²⁸ sets out the ambitions the Council have in delivering key projects. Relevant projects to assist in delivering housing include the following:

- Developing a property portfolio to enable the purchase of investment properties to generate more income for Council services.
- Delivering the South Godstone Garden Community through direct involvement as a key stakeholder in the delivery other than just as the local planning authority. This could see the Council owning land and delivering homes and infrastructure on site to ensure it can get the development it aspires to see delivered.
- Implementing an ambitious infrastructure programme that include a number of funding initiative schemes such as the Housing Infrastructure Fund bid to government for junction improvement on the A22.
- Commitment to a Council housing delivery programme to address identified gaps in the local market and enable affordable housing to be constructed on small or difficult sites the Council owns or can acquire.

²⁸ [Corporate Delivery Plan 2019/2020](#)

4. Responses and Action Plan

4.1 In response to the housing delivery analysis in Section 2 and on reflection of the key considerations set out in Section 3, the below key actions will be taken by the Council. The Action Plan is summarised below at the end of this section. It shows the realistic timescale for the actions involved. The Action Plan is both ambitious and long term, as it involves significant changes in the planning for housing in Tandridge.

Adopt New Local Plan

4.2 As set out previously, the current adopted Core Strategy (2008), which sets the current housing target and is more than five years old is, in accordance with the Government's definition, considered to be out of date. On 18 January 2019, the Council submitted a Local Plan prepared against up to date evidence and policy, to the Planning Inspectorate for examination. Policy TLP01: Spatial Strategy of the emerging plan sets out to provide 6,056 (303 homes per year) homes within the Plan period to 2033. The overarching strategy makes provision for a higher delivery target than earlier adopted plans and will boost housing land supply and delivery within the context and constraints of the Tandridge area. The adopted plan target of the Local Plan will replace that of the current HDT figure and the Council will meet the Housing Delivery Test against this new Plan requirement.

4.3 The tables below identify the calculations used for the most recent published HDT results and also show a notional predicted 2020 outcome taking into account the Our Local Plan: 2033 requirement figure once adopted. Homes delivered in future years is taken from the latest publication of the housing trajectory, also contained in Appendix 1 of this document.

HDT Calculation 2018								
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	HDT
2015-16	2016-17	2017-18		2015-16	2016-17	2017-18		
425	428	464	1,317	318	222	317	856	65%

Predicted HDT Calculation 2020 following adoption of Our Local Plan: 2033								
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	HDT
2017-18	2018-19	2019-20		2017-18	2018-19	2019-20		
303	303	303	909	332*	244	468	1,044	115%

**Please note that this figure is taken from our net completion figures from the 2017-.2018 AMR that feature in the housing trajectory. The Council has recently raised the question with MHCLG regarding HFR forms which are used to monitor national housebuilding as the Council feel that the form as set out could result in the double counting of demolitions within the overall net completions. Therefore, masking potential additional housing delivery. We await a response on this and will ensure all future monitoring are reflective of their response.*

4.4 It is evident that Tandridge would be able to meet the HDT once the Local Plan: 2033 housing requirement figure is adopted. The Council will continue to take the necessary actions detailed in the summary table below; however, it is clear that the key action to boost housing delivery in Tandridge is to take Our Local Plan: 2033 through to adoption.

Infrastructure Delivery Plan (IDP)

4.5 Housing delivery analysis identified the result of the Core Strategy approach having an undesired effect on the provision of infrastructure. The lack of strategically planned development has resulted in infrastructure becoming saturated. This means that increased housing development will take longer to deliver with major infrastructure issues having to be addressed prior to, or alongside construction.

4.6 To address this, an Infrastructure Delivery Plan (IDP) has been created to support the objectives outlined in Our Local Plan: 2033 and provide details on the infrastructure needs within the District to support new development. The IDP sets out estimated costs associated with each infrastructure project/programme. It is a living document that will be regularly updated as necessary to best reflect partnership working with infrastructure providers and progression of schemes.

4.7 In addition to the IDP the Council are focusing on delivering a number of infrastructure schemes including through a current Housing Infrastructure Fund (HIF) bid. The HIF funding relates to upgrade works for highway improvements at junction 6 of the M25 and the Felbridge junction on the A22. The Council will continue to work with key infrastructure providers to help secure and deliver strategically important infrastructure needed to unlock and support housing delivery.

4.8 The Council will look to commence a Community Infrastructure Levy (CIL) review once Our Local Plan has substantively passed through the examination process. The review will update the current CIL process and reflect outputs of the Local Plan and update the charging schedule. Funds raised through CIL will go towards infrastructure needed to support housing growth. The Council are also currently looking into ways in which CIL funds can be more efficiently utilised and bid for, by partners, to secure that which will benefit communities and businesses as is appropriate, and which could contribute to lessening existing capacity issues.

Diversify Market Opportunities

4.9 As established, Tandridge has a history of developing a predominantly larger home on single and/or small sites and there is a need to diversify the type, size and mix of housing and on planned sites. The Local Plan and the Council's house-building programme will seek to do this which will help to bring forward housing at a higher and faster rate and meet a wider variety of needs.

4.10 On 15 January 2019 members of the Housing Committee adopted the Council's Housing Strategy 2019-2023. The Housing Strategy sets out the Council's vision and plans for housing for the next five years. An element of this strategy is to address the lack of housing mix in the District so that there are opportunities for households to downsize to smaller properties as their needs change as well as having larger homes available for growing families. Policy HS1 within the Housing Strategy aims to provide a mix of market housing on sites over 10 units in order to readdress the balance of housing types and provide smaller properties.

- 4.11 Planning for the South Godstone Garden Community through Our Local Plan: 2033 continues to play an important role in creating opportunities to diversify the type and mix of housing traditionally found in Tandridge. At this stage the overall strategic policies and development framework for the Garden Community is outlined in Our Local Plan: 2033. Further details relating to design and details will be prepared as part of an Area Action Plan (AAP). In advance of this, however, the Council is already looking at ways to accelerate the delivery of homes within the new community, over and above that which is set out in the emerging Local Plan trajectory. A key factor to this will be the ability to ensure any accelerated delivery can be supported by the necessary associated infrastructure.
- 4.12 The AAP will include policies that will seek to deliver affordable market and social lifetime homes that are mixed in size, type and tenure and built to ensure they can respond to the changing needs of residents over time. This can open up a new housing sub-market in Tandridge. The Council will take a proactive role to delivering the policies set out for the Garden Community subject to adoption of Our Local Plan: 2033.

Greater, Direct Public Sector Role

- 4.13 The Council's Strategic Asset Management team are leading on building and managing the Council's property portfolio and delivering housing development. The Council are keen to look at ways in which they can become more actively involved in land acquisition, general housing delivery and council house-building including through the delivery of the Garden Community and options as to the extent of involvement are already being explored.
- 4.14 Several programmes the Council will be focusing on are featured within the Corporate Delivery Plan 2019/20. Income from existing sites will continue to be maximised with additional income to support the Council's finances and help the Council to deliver many services and developments. Work will continue with the Council's Housing Delivery Programme; providing a range of different housing tenures to address identified gaps in the local market and enable more affordable housing to be constructed.
- 4.15 Future programmes will be focused around unlocking the Garden Community to allow opportunity for Council involvement. Additionally, the Housing Delivery Programme has a pipeline of 141 more homes currently in the programme that are moving forward. There is capacity within the business plan to support more through further site identification work.

The table below sets out the Council's actions taken from the key actions and responses set out in Sections 3 and 4 of this document. These actions feature current and future Council programmes/projects. They demonstrate the proactive approach the Council is taking to deliver housing to meet the needs of the District.

'Root Cause'	Key Actions	Specific Action List	Responsible Party	Timescales
1. Historic restraint-based planning	Adopt Our Local Plan: 2033	Plan process	TDC (Strategy Team)	Public hearing sessions commence October 2019.
		Promote/implement South Godstone Garden Community	TDC (Strategy Team)	Dependent on Local Plan progress. Options to be considered by the Strategy & Resources Committee in November 2019.
2. Infrastructure Constraints	Implement Infrastructure Delivery Plan (IDP)	Overall IDP – South Godstone Garden Community focus	TDC (Strategy Team)	Ongoing (live document)
		HIF for highway improvements to A22 corridor	Highways Agency, Homes England, Department for Transport	Decision on bid; Autumn 2019
		Implement CIL Review	TDC (Strategy Team)	Dependent on Local Plan progress.
3. Housing Development Profile	Diversify market opportunities	South Godstone Garden Community focus	TDC (Strategy Team)	Dependent on Local Plan progress. Options to be considered by the Strategy & Resources Committee in November 2019.
		Implement Housing Strategy policies through planning application process	TDC (Regulatory Team)	Ongoing
4. Public Sector Role	Greater, direct, public sector role	Land acquisition financed by public borrowing	TDC (Strategy and Strategic Asset Management Teams)	Ongoing

		Direct council house-building (Housing company / expand programme capacity)	TDC (Strategy and Strategic Asset Management Teams)	Ongoing
		Joint ventures with private sector for infrastructure delivery and facilitation to achieve new types of market housing (private rent / self-build)	TDC (Strategy and Strategic Asset Management Teams)	Ongoing
		Public sector partnership and funding for HIF (Homes England and Registered Providers) to achieve more affordable housing	TDC (Strategy and Strategic Asset Management Teams)	Ongoing

5. Project Management and Monitoring Arrangements

- 5.1 The actions summarised in the table in Section 4 sets out the work the Council will aim to undertake within the timescales stated. The Action Plan will be monitored and reviewed by the Strategy Team on an annual basis when the publication of the HDT results are available.
- 5.2 Information relevant to the Action Plan will be collected from a range of sources such as the AMR, Our Local Plan: 2033, IDP, Housing Topic Paper, Housing Strategy, Corporate Delivery Plan, South Godstone Garden Community documents and any other relevant documents.
- 5.3 The actions implemented by those services indicated in the “Responsible Party” column of the table in Section 4. Actions will be updated where necessary and new actions will be added in response to any changes in legislation, Government policy and practice guidance.

6. Conclusion

- 6.1 In summation, the key action to this Action Plan will be to proceed the emerging Local Plan through to adoption. The Local Plan sets out the development strategy for the District up to 2033 and will seek to address the root causes of the current delivery position in Tandridge, as set out in Section 3. The Local Plan will make provision for a higher delivery target than earlier adopted plans have adopted whilst also taking into account the local context and constraints of the District and balancing these in seeking to provide for development need.
- 6.2 Section 4 demonstrates that once the Local Plan is adopted Tandridge would be able to meet the HDT and consequentially boost housing delivery in the area. Steps will be taken to increase delivery rates outside of the Local Plan process through the implementation of current adopted strategies and policies such as the Housing Strategy, Corporate Delivery Plan and any other relevant documents. The Local Plan however, will remain as the key development plan document to meet the requirements to higher delivery.

Appendix 1

The table below indicates the proposed Local Plan: 2033 housing trajectory that is featured within the Five Year Housing Land Supply and Housing Monitoring Supporting Paper.

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total
Completions	256	142	322	228	332	244	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,524
Permissions (up to expiry)	0	0	0	0	0	0	435	450	212	0	0	0	0	0	0	0	0	0	0	0	1,097
Local Plan Sites	Tier 1 HELAA sites	0	0	0	0	0	6	74	6	100	302	135	0	0	0	0	0	50	0	0	673
	Tier 2 HELAA sites	0	0	0	0	0	0	0	0	15	160	117	57	0	0	50	50	50	0	0	499
	Urban Capacity Sites (UCS)	0	0	0	0	0	0	14	0	11	50	0	0	0	0	0	0	0	0	0	75
	Town Centre Initiatives (CMP and OXTC)	0	0	0	0	0	20	10	0	65	50	50	0	0	32	50	0	0	0	0	277
	Garden Community	0	0	0	0	0	0	0	0	0	0	0	0	200	200	200	200	200	200	200	1,400
Council Housebuilding	0	0	0	0	0	0	7	22	26	20	20	20	20	20	20	20	0	0	0	0	195
Empty Homes	0	0	0	0	0	0	0	0	20	20	20	20	20	20	20	20	20	20	20	20	240
Windfall	0	0	0	0	0	0	0	0	31	31	31	31	31	31	31	31	31	31	31	31	372
Total	256	142	322	228	332	244	468	570	295	262	633	373	128	271	303	371	301	351	251	251	6,352
Total Supply	1,524						2,228					1,446					1,154				

Appendix 2

The table below denotes the sites that the Council has removed from the total commitments that feature in the proposed Our Local Plan: 2033 trajectory.

Address	Planning Application Reference	Planning Permission Year	Planning Permission Date	Expiry Date	Description	Gross	Net
Dorothys Cottage Studio, High Street, Limpsfield	2012/229	15/16	01/06/2015	01/06/2018	conversion of resulting building and dorothy's cottage to provide 2 x 3-bed dwellings with car parking and associated works - application to extend time limit for implementation of permission ta/2008/1704/11.	2	1
Firth Manor, Lingfield Road, East Grinstead, RH19 2JW	2015/174	15/16	29/04/2015	28/04/2018	Demolition of existing farm buildings. Erection of dwelling. (Outline Application All Matters Reserved)	1	1
Bronzeoak House, Stafford Road, Caterham	2015/1227	15/16	05/11/2015	04/11/2018	Demolition of existing office building. Erection of 34 flats with associated parking and landscaping.	34	34
Quadrant House, 47 Croydon Road, Caterham CR3 6PB	2015/173/NC	15/16	08/12/2015	07/12/2018	Change of use of a building from Office (Class B1) to a use falling within Class C3 (dwellinghouse). (Prior Approval) (Class J Part 3 of Schedule 2)	53	53
Total							89