
Housing Delivery Test Action Plan



May 2025



Elmbridge
Borough Council

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1. Introduction

- 1.1 The Housing Delivery Test (HDT) was introduced through the National Planning Policy Framework (NPPF) in July 2018. It assesses the number of homes delivered (built) against the housing requirement for each Local Planning Authority (LPA) over the past three-year period.
- 1.2 The latest HDT results (the 2023 HDT measurement) were published in December 2024¹. The results for Elmbridge Borough Council (EBC) showed that 1,354 homes were delivered between 2020/21 and 2022/23 against a requirement of 1,709 homes, a score of 79%.
- 1.3 As less than 95% of the 1,709 homes required between 2020/21 and 2022/23 have been delivered in Elmbridge, the NPPF sets out that the Council must prepare and publish an HDT Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. The Action Plan must be published within six months of the publication of the 2023 HDT results – i.e. by 12 June 2025.
- 1.4 The Council published a HDT Action Plan in June 2024 in response to the 2022 HDT results, in which 90% of housing requirement was delivered between 2019/20 and 2021/22. This HDT Action Plan supersedes the Action Plan published in June 2024.
- 1.5 This Action Plan demonstrates the Council's continued commitment to positively respond to the challenge of significantly boosting housing supply and delivery in the Borough. It assesses the causes for past under delivery; reflects on the performance of the previous Action Plan; and sets out the actions the Council is taking to increase housing delivery in the future.
- 1.6 In addition, as less than 85% of the homes required between 2020/21 and 2022/23 have been delivered, the NPPF states that a 20% buffer must be added to the Council's housing requirement for the purposes of the 5 Year Housing Land Supply.

¹ [Housing Delivery Test: 2023 Measurement](#)

2. Policy context

National policy and guidance

Housing Delivery Test consequences

- 2.1 Paragraph 79 of the NPPF² states that “*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”.*
- 2.2 As the 2023 HDT result shows 79% of the homes required between 2020/21 and 2022/23 have been delivered in Elmbridge, the Council is required to produce an HDT Action Plan in accordance with part (a) of paragraph 79 of the NPPF. In addition, a 20% buffer must be applied to the Council’s housing requirement for the purposes of calculating a 5 year housing land supply in accordance with part (b) of paragraph 79.

Housing requirement

- 2.3 In accordance with paragraph 78 of the NPPF, the housing requirement used in the 2023 HDT measurement for Elmbridge is the Borough’s local housing need (LHN), which is calculated using the standard method set out in planning practice guidance (PPG)³.

² [National Planning Policy Framework, December 2024](#)

³ [Planning Practice Guidance, Housing and Economic Needs Assessment, December 2024](#)

- 2.4 Although the NPPF published in December 2024 revised the standard method for calculating LHN, resulting in a significant increase to the LHN in Elmbridge, the 2023 HDT measurement is calculated using the previous standard method. The full calculation for both the December 2024 standard method and previous standard method are set out in Appendix 1.
- 2.5 Paragraph 80 of the NPPF goes on to establish that “*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*”.

Planning Practice Guidance

- 2.6 The PPG on Housing Land Supply provides some additional guidance on the production of HDT Action Plans. Paragraph 42 (ref. ID 68-050-20240205) sets out that LPA’s may wish to include an analysis of under-delivery considering:
- barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales;
 - barriers to delivery on sites identified as part of the 5 year housing land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.);
 - whether sufficient planning permissions are being granted and whether they are determined within statutory time limits;
 - whether the mix of sites identified is proving effective in delivering at the anticipated rate.
 - whether proactive pre-planning application discussions are taking place to speed up determination periods;
 - the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery;
 - whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable.

2.7 Paragraph 43 (ref. ID 68-051-20190722) sets out that Actions to boost delivery could include:

- revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land;
- working with developers on the phasing of sites, including whether sites can be subdivided;
- offering more pre-application discussions to ensure issues are addressed early;
- considering the use of Planning Performance Agreements;
- carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites;
- revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies;
- reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;
- establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed;
- ensuring evidence on a particular site is informed by an understanding of viability;
- considering compulsory purchase powers to unlock suitable housing sites;
- using Brownfield Registers to grant permission in principle to previously developed land; and

- encouraging the development of small and medium-sized sites.

Local policy

Adopted Local Plan policy

- 2.8 The Council's Core Strategy adopted in July 2011⁴ introduced a housing requirement of 225 dwellings per annum (dpa) over the 15 year period 2011 to 2026 set out in Policy CS2.
- 2.9 In accordance with paragraph 78 of the NPPF and paragraph 003 (ref. ID: 68-003-20190722) of the PPG on Housing Land Supply⁵, Policy CS2 and the housing requirement it sets out is recognised to be out-of-date since 2018, as it is more than 5 years old and has been reviewed and found in need of updating.
- 2.10 Paragraph 78 of the NPPF establishes that where a housing requirement is out of date, the housing land supply position is to be assessed against the LPA's LHN, calculated using the standard method.

Draft Elmbridge Local Plan 2037

- 2.11 The Draft Elmbridge Local Plan 2037 was submitted to the Planning Inspectorate for Examination in August 2023. In the Interim Findings published in September 2024 after stage 2 of the examination, the Inspector found the draft plan unsound as submitted and recommended the Council choose to withdraw the plan or request a full report in which the plan would be found unsound. The Council took the decision to withdraw the draft Plan at Full Council on 26 February 2025.

Local housing need

- 2.12 The NPPF published in December 2024 revised the standard method for calculating LHN, introducing the size of the existing housing stock of an area into the approach, as well as an additional uplift where affordability has worsened over time.
- 2.13 The revised standard method generates a LHN of 1,574 dpa for Elmbridge. However, the 2023 HDT measurement has been calculated using the previous standard method (first introduced in 2018 and amended in 2020), which generated a LHN of 421 dwellings in 2020/21, 641 dwellings in 2021/22 and 647 dwelling in 2022/23. LHN calculated using the previous

⁴ [Elmbridge Borough Council Core Strategy, July 2011](#)

⁵ [Planning Practice Guidance, Housing Land Supply](#)

standard method saw the figure change every year to reflect population growth estimates and published affordability ratios.

2.14 The recent increase to the LHN for Elmbridge introduced by the new standard method follows a trend of increasing LHN identified through the standard method over the past 10 years. This is demonstrated in Table 2.1 below.

Table 2.1: Local Housing Need

Source	Methodology	Local housing need per annum
Core Strategy 2011	Adopted housing target (now out of date)	225
Kingston and North Surrey Strategic Housing Market Assessment (SHMA) 2016	Objective assessment of need (OAN)	474
Local Housing Need Assessment (LHNA) 2020	2020 Standard Method calculated LHN for 2020	626
Local Housing Need Assessment (LHNA) 2021	2020 Standard Method calculated LHN for 2021	641
Local Housing Need 2022	2020 Standard Method calculated LHN for 2022	647
Local Housing Need 2023	2020 Standard Method calculated LHN for 2023	650
Local Housing Need 2024	Dec. 2024 Standard Method calculated LHN for 2024	1,574

3. Past housing delivery performance

Past housing completions

- 3.1 Although the housing target is now considered to be out of date. EBC has a strong record of delivering housing above the housing target of 225 new homes per annum adopted in the Core Strategy. The Council's Authority Monitoring Reports (AMRs) show that since the adoption of the Core Strategy in 2011, housing delivery has never fallen below the Core Strategy housing target.

Table 3.3: Net housing completions from 2011/12 to 2023/24

Monitoring year	Net homes completed
2011/12	300
2012/13	264
2013/14	257
2014/15	273
2015/16	240
2016/17	267
2017/18	231
2018/19	353
2019/20	396
2020/21	302
2021/22	768
2022/23	236
2023/24	406
Total	4,293

**The number of homes delivered each year may differ in the AMR and the HDT results as the HDT uses the housing supply: net additional dwellings⁶ dataset to determine the number of homes delivered. This is a statistical dataset produced by the office for national statistics (ONS) that takes other data and factors into account as well as the net completion figures reported by the Council's AMR.*

⁶ [Housing supply: net additional dwellings](#)

Past Housing Delivery Test performance

2023 Housing Delivery Test measurement

3.2 The latest HDT results – the 2023 HDT measurement, published in December 2024, show that 76% of the new homes required between 2020/21 and 2022/23 were delivered in Elmbridge.

Table 3.1: HDT: 2023 measurement

Homes required	Homes delivered	HDT: 2023 measurement	Consequence
1,709	1,354	76%	Action plan 20% buffer to 5 year housing land supply

3.3 As the 2023 HDT result is below 95%, EBC is required to prepare and publish a HDT Action Plan before the 12 June 2025 and a 20% buffer must be applied to the Council's 5 years housing land supply requirement.

Table 3.2: HDT measurement results from 2018 to 2023

HDT	Homes required	Homes delivered	HDT measurement
2018 HDT	1030	637	62%
2019 HDT	1421	824	58%
2020 HDT	1639	953	58%
2021 HDT	1618	1133	70%
2022 HDT	1635	1474	90%
2023 HDT	1709	1354	79%

Table 3.3: Annualised HDT results from 2015/16 to 2022/23

Monitoring year	Homes required	Homes delivered	Surplus (+) / shortfall (-)
2015/16	225	240	+ 15
2016/17	355	267	- 88
2017/18	443	130	- 313
2018/19	623	427	- 196
2019/20	573*	396	- 177
2020/21	421*	346	- 119
2021/22	641	768	+ 127
2022/23	647	240	- 407

*The government reduced the 'homes required' within the 2019 to 2020

monitoring year by a month and within the 2020 to 2021 monitoring year by 4 months in the Housing Delivery Test due to the national lockdown which saw temporary disruption to local authority planning services and the construction sector. This is reflected in the 2022 HDT results.

- 3.4 Table 3.1 and 3.2 shows that housing delivery in the Borough has often fallen short of the HDT housing requirement with significant shortfalls recorded every year other than 2015/16 and 2021/22.

4. Causes of under delivery

- 4.1 Building homes is often a complex process and there are a range of factors causing sites to not come forward for housing delivery that are beyond the control of the Council. A broader approach is required to increase the delivery of new homes and the use of other tools available, which are beyond the traditional remit of a Local Planning Authority (LPA).

What are the causes of under delivery in the borough?

- Limited land supply and available land for development
- Over delivery of large, 4+ bedroom detached dwellings
- Small sites unable to supply the mix and quantum of housing needed
- Low density development/character of the area
- Site specific issues
- Landowner and developer circumstances

Other potential issues

- Decision-making performance
- Borough-wide infrastructure
- High land values

Limited land supply and available land for development

Constraints

- 4.2 One of the key issues affecting the delivery of new homes in Elmbridge is that the borough's land supply is severely limited. Elmbridge is embedded in the Metropolitan Green Belt which covers 57% of the borough⁷. The Council and the Government attach great importance to the Green Belt. Paragraph 142 of the NPPF states that "*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*". Paragraph 145 of the NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances through the local plan review process.
- 4.3 The borough's land has a high nature conservation value, including areas of international importance and three Sites of Special Scientific Interest (SSSI)⁸. The borough is characterised by extensive green areas including

⁷ See Appendix 2 for Borough Map of the Metropolitan Green Belt.

⁸ These are Esher Common SSSI comprising parts of Esher Common, West End Common, Fairmile Common and Oxshott Heath; Ockham and Wisley SSSI, a relatively small area in Elmbridge; and Knight and Bessborough Reservoirs SSSI in Hurst Road, Molesey.

woodland, ancient woodland, common land, farmland, rivers, reservoirs and parkland. It includes the Thames Valley with the River Thames and its floodplain, as well as the Thames Basin Heath and the Thames Basin Lowlands. There are also historic landscapes at Claremont, Painshill and Oatlands Park. Taken together, these features give the borough a high quality, distinctive landscape with significant landmarks, which results in a limited supply of land appropriate for development and the delivery new housing, particularly on a large scale.

- 4.4 A range of national policy and designations, such as the protected landscape features identified above (SSSIs, RAMSAR sites and Thames Basin Heath Special Protection Area – TBH SPA); the functional floodplain (flood zone 3b), registered parks and gardens; registered commons and village greens; ancient woodlands; ancient and veteran trees; and priority habitat areas sites constrain the supply of land for development in borough. These constraints are identified in the Council’s Review of the Absolute Constraints (2016⁹ and 2019 update)¹⁰.

Land Availability Assessment

- 4.5 Taking known constraints into account, the Council prepares a Land Availability Assessment (LAA) to identify all known available sites in the Borough with the potential to deliver housing and non-residential development. The most recent LAA¹¹ was published in February 2023. This along with previous iterations of the LAA identify a supply of available sites from the supply of brownfield land in the Borough’s urban areas.
- 4.6 The Council’s recent LAAs have identified a decreasing supply of available brownfield land in the Borough for development between 2021 and 2023 confirming that supply of available is an issue impacting housing delivery.

Table 4.1: Land Availability Assessment results between 2021 and 2023

Source	LAA 2021	LAA 2022	LAA 2023
Total supply of available sites	7,750	7,564	6,894
Local housing need	9,615 (641 per annum)	9,705 (647 per annum)	9,750 (650 per annum)
Surplus (+) / Shortfall (-)	- 1,865 - 19%	- 2,141 - 22%	- 2856 - 29%

⁹ [Elmbridge Borough Council, Review of Absolute Constraints, 2016](#)

¹⁰ [Elmbridge Borough Council, Review of Absolute Constraints, 2019 update](#)

¹¹ [Elmbridge Borough Council, Land Availability Assessment, February 2023](#)

5 year housing land supply

- 4.7 With the significant increase in the Borough's LHN resulting from the introduction of the new standard method, the Council's housing land supply position has worsened.
- 4.8 Against a LHN of 1,574 dpa, the Council currently has a 0.9 year (1,705 homes) supply of deliverable sites against a housing requirement of 9,444 homes and is therefore unable to demonstrate a 5 year Housing Land Supply (5YHLS). The full detailed 5YHLS calculation is provided in Appendix 3.

Table 4.2: 5 year housing land supply position (June 2025)

		New homes
A	Total requirement, 2025-30 (table 1)	9,444
B	Total supply (table 2)	1,705
C	5YHLS (A / B)	0.9 yrs

- 4.9 In light of the pressing need to identify more available land for development and the delivery of homes in the Borough. The Council is currently preparing a new iteration of the LAA, which will be produced in accordance with Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment¹².
- 4.10 The Council's 5 YHLS is updated every year after 1st April to move the base date from which the 5 year period is calculated forward and include all known permissions and sites under construction that have come forward in the previous year.

¹² [Planning Practice Guidance, Housing and Economic Land Availability Assessment](#)

Over delivery of large 4+ bedroom detached dwellings

- 4.11 An over delivery of large detached dwellings in the borough has had a direct impact on the number of new smaller homes being delivered. The Council's latest Local Housing Need Assessment (LHNA)¹³ identifies the mix of different sized, types and tenure of homes needed in the borough. The LHNA concludes that there is a much greater need for smaller market housing, particularly 2 bed homes than large 4+ bed homes.

Table 4.3: Identified housing mix (LHNA)

Number of beds	Percentage need for market housing
1 bed	20%
2 bed	50%
3 bed	20%
4 bed	10%

- 4.12 Data published in the Council's AMRs and set out in table 4.3 below, highlights that historically the proportion of new homes delivered in the borough that have 4 or more bedrooms has significantly exceeded the 10% identified in the LHNA. 19% to 45% of the new homes delivered in the borough each year between 2014/15 and 2020/21 were 4+ bed units. This has resulted in an oversupply of larger homes, which fail to contribute to local housing needs and do not make the most efficient, optimised use of land.
- 4.13 To increase the delivery of the types of homes needed locally and to ensure greater optimisation of development land, the Council has published a series of [Development Management Advice Notes](#). In conformity with existing policy requirements set out in national planning policy, as well as the Council's Core Strategy and Development Management Plan¹⁴, the advice notes set out the housing mix needed in the Borough and the importance of optimising land appropriately. The Council's position in relation to type and/or optimisation has been regularly upheld by Inspectors at appeal.
- 4.14 The results of this intervention can be seen in more recent AMRs. In 2021/22 9.6% of the homes completed were 4+ bed units, representing a significant improvement on the 30% delivered in 2020/21. Overall, this reduction in the proportion of large 4+ bed homes delivered has continued with 18% in 2022/23 and 6% in 2020/23.
- 4.15 Alongside the reduction in the large 4+ bed homes delivered each year, the

¹³ [Cobweb Consulting, Local Housing Need Assessment, March 2020](#) and [Addendum, November 2021](#)

¹⁴ [Elmbridge Borough Council, Development Management Plan, April 2015](#)

proportion of smaller 1 and 2 bed homes have overall increased from 17.5%, 37% in 2020/21 to 37% and 47% in 2023/24. Delivering a greater proportion of smaller homes will ensure the housing that is delivered makes a better contribution to meeting the identified need in the borough and ensure greater optimisation of available land for development.

Table 4.4: Housing mix of the gross new homes delivered between 2014/15 2023/24

Monitoring year	1 bed	2 bed	3 bed	4+ bed
2014/15	16.8%	26.9%	10.5%	45.8%
2015/16	31.7%	17.3%	7.8%	43.2%
2016/17	26.1%	33.9%	9.5%	30.5%
2017/18	16.2%	23.1%	13.7%	46.9%
2018/19	28.1%	27.7%	18.2%	26.0%
2019/20	26.8%	36.3%	17.6%	19.3%
2020/21	17.5%	37.1%	15.3%	30.1%
2021/22	35.4%	44.3%	10.8%	9.6%
2022/23	31.1%	28.7%	22.3%	17.9%
2023/24	37.1%	46.7%	10.0%	6.2%

Small sites unable to supply a mix and the quantum of housing needed

- 4.16 The Council’s most recent LAA (published in February 2023) highlights that there is a very limited supply of large sites available for development and the delivery new homes, with most of the land supply consisting of small sites. The average site available for development identified in the most recent LAA is 0.5 ha, with 130 (78%) of the 167 identified sites with developable areas less than 0.5 ha. Small sites therefore represent a significant proportion of the development that comes forward in the borough and this is expected to continue.
- 4.17 However, an oversupply of small sites will result in sites coming forward that are unable to supply the mix of housing needed in the borough as they are too constrained. In addition, small sites alone are unable to deliver the quantum of new homes needed, in particular, the oversupply of small sites has impacted the delivery of affordable housing in the borough as small sites typically cannot deliver onsite affordable housing units.

Low density development/character of the area

- 4.18 Elmbridge is characterised by low density development and data published in the Council’s AMRs have historically recorded relatively low density residential development coming forward across the borough each year.

Ranging from 38.7 to 57.8 dwellings per hectare (dph) between 2014/15 and 2020/21.

Table 4.5: Average density of completed residential development between 2013/14 and 2023/24

Monitoring year	Average density of completed residential development
2014/15	43
2015/16	57
2016/17	57.8
2017/18	33.2
2018/19	46.8
2019/20	39.2
2020/21	38.7
2021/22	39.6
2022/23	75.1
2023/24	81.1

- 4.19 As outlined above, the Council published a series of Development Management Advice Notes to promote greater optimisation of development land coming forward in the borough, this is addressed by [Development Management Advice Note 2: Optimising Development Land](#) in particular. This approach is supported by NPPF paragraph 130, which states that *“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”*.
- 4.20 Since the Council’s advice notes were published recent AMRs have recorded a notable increase in the densities of new residential development in the borough. The average density of new residential development rose from 39.6 dph in 2021/22 to 75.1 dph in 2022/23 and 81.1 in 2023/24.

Site specific issues

- 4.21 A range of issues specific to each site can impact development, leading to slower build out rates than may have originally been anticipated, which in turn impacts the number of homes delivered each year in the Borough. These include:
- Complex landownership arrangements and multiple landowners of parcels
 - Viability and planning obligations

- Sites relying on other developments to come forward
- Overcoming site constraints and planning designations such as Green Belt and flood risk.
- Land contamination
- Access to and from the site
- Legal issues including lease arrangements, covenants and the rights to light

Landowner and developer circumstances

4.22 The circumstances of landowners and developers can also impact the rate at which sites are built out and impact the number of homes delivered each year. The circumstances that can create barriers to homes being built include:

- The business model of the landowner – i.e. whether or not they intend to build themselves or sell the site at a profit after securing an uplift in land value following the grant of planning permission.
- Access to finance and cost of interest payments.
- Land value expectations.
- Extent of the freeholder/leaseholder motivation to develop the site.

4.23 The Council has regular ongoing dialogue with developers, agents and site promoters active in the borough to monitor build out rates, obtain information on barriers to delivering new homes and market conditions. In general, the current market conditions and demand reflect the local need to deliver smaller homes.

4.24 In recent years issues around securing and delivering affordable housing as part of mixed market and affordable schemes have arisen, particularly on small sites, which make up the majority of sites that come forward in the Borough. Developers have been finding it increasingly challenging to find Registered Providers (RPs) that are willing to take on new units in this context, with many focusing on upgrading/refurbishing their existing stock to meet changing standards or not willing to take on smaller numbers of units that are part of mixed affordable and market schemes, preferring larger 100% affordable developments.

Other potential issues

Decision-making performance

- 4.25 The performance of decision making in the Council's Planning Services is not considered to be a barrier to delivering new homes in Elmbridge. The development management team consistently deliver a strong performance with the most recent statistics, set out in the Council's 2023/24 AMR¹⁵, showing 93% of major applications, 88% of minor applications and 85% of other applications were determined within statutory timeframes, well above the national targets of 60%, 70% and 70% respectively. This demonstrates that the time in which planning applications are processed and determined is not impacting the delivery of new homes in the borough.
- 4.26 The Council's appeal performance is also strong. Again, the most recent statistics, set out in the 2023/24 AMR show that 70% of appeals lodged were dismissed by Inspectors in 2023/24. This demonstrates the Council is making sound planning decisions and again that decision making is not leading to unnecessary delays and costs impacting the delivery of new homes in the borough.

Borough-wide infrastructure

- 4.27 There are no known infrastructure barriers preventing the commencement of sites with extant planning permission expected to deliver new homes.

High land values

- 4.28 Elmbridge has some of the highest land values and property prices in the country. Viability is not considered to be an issue that is preventing developers from delivering new homes in the borough. In the past land values and the market have heavily influenced the type of housing being delivered in the borough and resulted in the dominance of large 4+ bed luxury homes.
- 4.29 The Council has always sought to maximise affordable housing provision and continues to apply Core Strategy Policy CS21 Affordable Housing on a case-by-case basis, which requires a contribution to affordable housing from sites with fewer than 10 units.
- 4.30 The Council has introduced a viability consultancy framework to support the implementation of the current affordable housing policy. This provides the

¹⁵ [Elmbridge Borough Council, Authority Monitoring Report 2023/24, December 2024](#)

Council with greater choice and expertise when seeking independent review of viability assessments submitted with planning applications.

5.Action plan

How the Council is boosting housing delivery

- 5.1 The Council is committed to working proactively and is utilising the full range of tools and processes at its disposal to boost the delivery of new homes in the borough. Housing delivery has a wider remit than the Planning Service and requires actions to be undertaken by other Council services, including the Housing and Asset and Property Management Services.
- 5.2 Whilst housing completions improved in 2021/22 with 768 new homes completed compared to an average of 300 – 350 homes delivered each year over the previous 10 years, completions fell again in 2022/23 to 236 new homes. Completions rose again in 2023/24 to 406 homes, which represents a relatively high number of completions compared to the average over the last 10 years (excluding 2021/22), and may indicate the start of an increase in housing delivery in the borough. That said, the wider local and national barriers to delivering new homes have not significantly changed since the publication of the Council's previous Action Plan in June 2024.
- 5.3 The Council regularly engages with developers, agents and site promoters on an ongoing basis to monitor build-out rates, obtain information on barriers to delivering new homes and market conditions.
- 5.4 The Council collaborates with registered providers and housing companies to deliver affordable homes. The Council expects to meet its commitment to support the delivery of at least 300 new affordable homes between April 2020 and March 2025, which was set out in the Council's Housing, Homelessness & Rough Sleeping Strategy¹⁶.
- 5.5 Revision of the pre-application advice service implemented in 2020 continues to help speed up the delivery of new homes as the improved quality and speed of advice given to applicants and developers in advance of the submission of a planning application, feeds through to sites coming forward and completing.
- 5.6 The Council continues to utilise Planning Performance Agreements (PPAs) for major development schemes at pre-application and planning application

¹⁶ [Elmbridge Borough Council, Housing, Homelessness & Rough Sleeping Strategy 2020 - 2024, December 2019](#)

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

- 5.7 The Council will continue to monitor housing delivery and sites closely to ensure there is an up to date and accurate understanding of housing delivery rates and land supply available for development in the Borough.

What has the Council done so far?

- 5.8 The tables below provide a summary of what the Council has done to achieve the actions identified in its previous HDT action plans and what it needs to do to boost the delivery of housing in the borough. Many of these actions have been carried out across the Council's Planning, Housing and Asset Management and Property services.

Progress with the actions first published in the 2020 HDT Action Plan

- 5.9 The Council’s draft Local Plan was found unsound at Examination and the Council made the decision to withdraw the Plan on 26 February 2025. The actions relating to progressing the draft Local Plan to adoption, first published in the Council’s 2020 HDT, are list in the tables below as a record of the actions the Council has taken to boost the supply of new homes in the Borough to date.

Table 5.1: HDT Action Plan 2020 - Local Plan progress

Actions	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> Through the Local Plan preparation, the council will respond positively to the challenge of housing need and identify a sustainable growth strategy by establishing a housing target. This is supported by the Elmbridge Council Plan 2020-2021 ‘Character and Development’ priority to publish the draft Local Plan and submit it to the Planning Inspectorate for Examination. 	<p>Planning Services</p>	<p>August 2023 (Plan submitted)</p>	<p>On the 10 August 2023, the draft Local Plan 2037 was submitted to the Planning Inspectorate for Examination.</p> <p>The plan contained policies delivering new homes and a growth strategy that responds positively to the housing challenge.</p> <p>The plan was supported by the Council’s 2030 Vision document. One of its key goals is that ‘Our Local Plan will be in place, outlining our commitments for how the communities and places in the borough will develop’.</p> <p>The draft Plan was found unsound at Examination and the Council resolved to withdraw the Plan at Full Council on 26 February 2025. The Council will begin the plan making process again.</p>

Actions	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> As part of the Duty to Cooperate, the council will work with its neighbouring authorities to produce Statements of Common Ground (SoCGs). The Statements will focus on strategic cross-boundary issues such as housing, it will note where agreement has and has not been met. 	Planning Services	August 2023 (Evidence submitted)	<p>On the 10 August 2023, the draft Local Plan 2037 was submitted to the Planning Inspectorate for Examination.</p> <p>Submission documents included the Duty to Cooperate Statement of Compliance, the Duty to Cooperate Scoping Statement and Statements of common ground.</p> <p>The Inspector through the Stage 1 Hearing sessions of the Examination in Public examining the Draft Local Plan found that the Council had met the Duty to Cooperate.</p> <p>The draft Plan was found unsound at Examination and the Council resolved to withdraw the Plan at Full Council on 26 February 2025. The Council will begin the plan making process again.</p>
<ul style="list-style-type: none"> Continue to monitor sites to support an accurate Land Availability Assessment (LAA) to inform the draft Local Plan. 	Planning Services	Annually	<p>Land Availability Assessments were updated on an annual basis. Since the 2020 HDT Action Plan, three LAA documents have been published.</p> <ul style="list-style-type: none"> LAA 2021 LAA 2022 LAA 2023

Actions	Department Responsible	Delivery Date	Progress
			<p>The LAA 2022 informed the draft Local Plan site allocations chapter and the housing target proposed in Strategic policy SS3 and Housing policy HOU1.</p> <p>The LAA 2023 informed the 4YLS formula and housing trajectory supporting the draft Local Plan.</p>
<ul style="list-style-type: none"> Complete new viability work to support the new Local Plan and to strengthen the council's position to increase the provision of affordable homes in the borough. 	<p>Planning Services</p>	<p>June 2022</p>	<p>The Viability Assessment 2022 was published at the Regulation 19 representation period of the draft Plan in June 2022. This evidence informed the draft Local Plan policies including affordable housing.</p> <p>The draft Plan was found unsound at Examination and the Council resolved to withdraw the Plan at Full Council on 26 February 2025. The Council will begin the plan making process again.</p>
<ul style="list-style-type: none"> Review maximum density standards within current low-density designated areas. 	<p>Planning Services</p>	<p>August 2023 (Plan submitted)</p>	<p>The Special Low-Density designation were not taken forward in the draft Local Plan.</p> <p>Draft Local Plan policy HOU2: Optimisation of sites stated that development must make efficient use of land and optimise sites within the urban area.</p>

Actions	Department Responsible	Delivery Date	Progress
			However, the draft Plan was found unsound at Examination and the Council resolved to withdraw the Plan at Full Council on 26 February 2025. The Council will begin the plan making process again.

Table 5.2: HDT Action Plan 2020 - Improving decision making

Action	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> Review and update the Developers Contributions Supplementary Planning Document (SPD). 	Planning Services	April 2021	This was reviewed and updated in April 2021.
<ul style="list-style-type: none"> Review the standard conditions list for planning applications. 	Planning Services	Ongoing	This has worked well and has prevented delays by avoiding pre-commencement conditions being sought.
<ul style="list-style-type: none"> Continue to reduce the number of applications determined after statutory deadlines. 	Planning Services	Ongoing	Two new officer positions were agreed in 2024 which have enlarged the department and ensure applications are being determined within statutory deadlines.
<ul style="list-style-type: none"> Continue to determine applications in accordance with current National and Local targets. 	Planning Services	Ongoing	This continues and is reported annually in the Authority Monitoring Report (AMR).
<ul style="list-style-type: none"> Continue to develop and offer a proactive pre-application service to support the delivery of sustainable development. 	Planning Services	Ongoing	The pre-application service continues to be offered and provides a pro-active service which prevents delays to delivery.

Table 1: HDT Action Plan 2020 - Support wider housing opportunities

Action	Department Responsible	Delivery Date	Progress
<ul style="list-style-type: none"> Continue dialogue with developers and landowners to monitor build out rates and obtain information on barriers to delivering housing. This will help support and produce accurate evidence to support the Council’s housing trajectory and 5 year housing land supply. 	<p>Planning Services</p>	<p>Ongoing</p>	<p>A developer forum takes place annually which allows regular dialogue with developers.</p> <p>Landowners of urban sites identified in the LAA were contacted in 2023 to confirm timescales to delivery. The information informed the LAA which provided key evidence for the housing trajectory and 4YHLS that supported the Local Plan.</p>
<ul style="list-style-type: none"> Review publicly owned sites and work with external organisations who own land in the borough to identify potential opportunities for housing development and or land swaps. This will involve working with Surrey County Council and other stakeholders to develop ways to free up land for regeneration projects. In particular, areas presenting regeneration opportunities such as Lower Green (Character and Development – Elmbridge Council Plan 2020/21). 	<p>Asset Management and Property Services</p>	<p>Ongoing</p>	<p>Work is progressing on a number of publicly owned sites across the borough including the Esher town centre vision, which was adopted in July 2023 and the Lower Green Regeneration Project.</p> <p>An Asset Strategy Review is also underway which will balance operational, strategic and commercial outcomes.</p> <p>These projects are supported corporately and featured in the</p>

Action	Department Responsible	Delivery Date	Progress
			<p>Council's 2030 Vision document.</p> <p>The implications of Local Government Reorganisation (LGR) has resulted in some of these projects being put on hold.</p>
<ul style="list-style-type: none"> To adopt a reviewed CIL Charging Schedule to support the Local Plan 	Planning Services	Ongoing	With the withdrawal of the draft Local Plan. The Council will begin the plan-making process again and a review of the Council's CIL charging schedule will be undertaken alongside this.
<ul style="list-style-type: none"> Evolve CIL programme as required by amended CIL Regulations, replacing the Regulation 123 list with an Annual Infrastructure Funding Statement (AIFS) and publish the first AIFS. 	Planning Services	Annually	Annual funding statements have been published since 2019/20 and are available to view on the Community Infrastructure Levy(CIL) webpage.
<ul style="list-style-type: none"> Next Local and Strategic CIL project allocations will be made in June/July 2025 	Planning Services	Annually	Undertaken on an annual basis to provide communities the opportunity to spend local CIL funds and enable community projects to be funded from development that has taken place.
<ul style="list-style-type: none"> Review and update the Infrastructure Delivery Plan. 	Planning Services	May 2022	An updated IDP was published alongside the draft Local Plan for the Regulation 19 consultation in May 2022.

Table 5.4: HDT Action Plan 2020 - Support affordable housing

Action	Department Responsible	Delivery date	Progress
<ul style="list-style-type: none"> Continue to progress the establishment of the Council's housing company and deliver an increase of 40 units in the supply of affordable housing (Community and Wellbeing - Elmbridge Council Plan 2020/21). 	Housing Services and Asset Management and Property Services	March 2021 (Elmbridge Council Plan 2020/21)	The housing company has folded. All housing stock previously owned by the company has been transferred to Elmbridge Borough Council.
<ul style="list-style-type: none"> Ensure the transfer of key sites, currently in the ownership of public sector partners, in support of affordable housing priorities (Character and Development - Elmbridge Local Plan 2020/21). 	Asset Management and Property Services	March 2021 (Elmbridge Council Plan 2020/21)	Ongoing
<ul style="list-style-type: none"> As part of the new Housing, Homelessness & Rough Sleeping Strategy support the delivery of at least 300 affordable homes between April 2020 and March 2025 	Housing Services	March 2024	<p>271 new affordable homes delivered between April 2020 and March 2024, with 90 homes delivered in 2020/21, 51 in 2021/22, 101 in 2022/23 and 29 in 2023/24.</p> <p>A further 88 homes have been delivered between April 2024 and February 2025.</p> <p>Quarterly/annual delivery figures are published on Pentana.</p>

Table 5.5: HDT Action Plan 2024 - Proposed actions across all departments

Action	Department Responsible	Delivery Date
✓ Adopt the Local Plan which will allow the growth strategy, housing policies and site allocations to be implemented ensuring the delivery of homes in the borough for the next 15 years.	Planning Services	The draft Local Plan has been withdrawn and the Council will be starting the plan-making process again.
✓ Contact all applicants, agents and developers who have an unimplemented planning permission to find out if there are any issues preventing the delivery of housing.	Planning Services	2025
✓ Complete an annual Land Availability Assessment making sure all sites for housing are identified.	Planning Service	2025
✓ Complete the Brownfield Land Register	Planning Services	Annually
✓ Maintain the self-build and custom build register	Planning Services	Ongoing
✓ Progress the property and placemaking delivery strategy to identify land in public ownership and future development plans.	Asset Management and Property Services	Ongoing
✓ Deliver an annual Members' (Councillors) training programme to assist Members making sounds planning decisions.	Planning Services	Annually
✓ Continue to host Developers forums and find out what barriers there are to housing delivery.	Planning Services	Annually
✓ Continue to develop and implement a new Housing & Homelessness strategy to address the housing challenges our community faces	Housing	2025
✓ Continue to use the Housing Enabling Fund to increase homes in Elmbridge	Housing	Ongoing

What more can the Council do?

Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> Produce and adopt a new Local Plan that will set out a strategy and policies to boost the supply of homes in the Borough. <p>The draft Elmbridge Local Plan 2037 was withdrawn on 26 February 2025. The Council therefore will need to start the plan-making process again.</p> <p>The Council published a new Local Development Scheme (LDS) on 6th March 2025. This sets out a timetable for the production of a new Local Plan and supporting evidence base between 2025 and 2028.</p>	Planning Services	Dec. 2028
<ul style="list-style-type: none"> Produce a new Land Availability Assessment (LAA) to identify the available land for development in the Borough that could facilitate the delivery of new homes. <p>Once published, the Council will undertake regular engagement with landowners, developers and agents on an ongoing basis to maintain the LAA, with further iterations produced as required.</p>	Planning Services	Dec. 2025 / ongoing
<ul style="list-style-type: none"> Continue to update and maintain a housing trajectory and 5 year housing land supply position to monitor the pipeline of new homes in the Borough. 	Planning Services	Annually/when required
<ul style="list-style-type: none"> Continue to produce annual authority monitoring reports (AMRs) to monitor housing delivery in the Borough. 	Planning Services	Annually
<ul style="list-style-type: none"> Continue to update and maintain the Council's Brownfield Land Register to identify brownfield land that can be used to deliver new homes. 	Planning Services	Annually
<ul style="list-style-type: none"> Continue to update and maintain the self-build and custom build register to ensure the council has an accurate understanding of the demand for self-build housing in the Borough 	Planning Services	Annually

Action	Department Responsible	Delivery Date
<ul style="list-style-type: none"> Continue to progress the property and placemaking delivery strategy to identify land in public ownership and future development plans. 	Asset Management and Property Services Planning Services	Ongoing although the implications of Local Government Reorganisation (LGR) may impact the timeframe in which this action can be delivered
<ul style="list-style-type: none"> Continue to deliver annual Members' (Councillors) training programme to assist Members in making sound planning decisions. 	Planning Services	Annually
<ul style="list-style-type: none"> Continue to host developer forums to find out what barriers there are to housing delivery. 	Planning Services	Annually
<ul style="list-style-type: none"> Continue to develop and implement a new Housing & Homelessness strategy to address the housing challenges our community faces. 	Housing	Ongoing, anticipate delivery of action in 2025
<ul style="list-style-type: none"> Continue to use the Housing Enabling Fund to increase homes in Elmbridge. 	Housing	Ongoing
<ul style="list-style-type: none"> Continue to offer the revised pre-application service and Planning Performance Agreements (PPAs). 	Planning Services	Ongoing
<ul style="list-style-type: none"> Continue to collaborate with registered providers and housing companies to delivery more affordable homes. 	Housing	Ongoing

Appendix 1: Standard methodology for calculating local housing need

December 2024 standard method

Step one - setting the baseline

	Component	Figure
A	Existing dwelling stock – live table 125 unrounded	59,913
B	0.8% of existing dwelling stock	479.3

Step two - an adjustment to take account of affordability

	Component	Figure
C	Affordability ratio 5 year average – house price to workplace-based earnings ratio $((16.38+17.76+19.19+15.68+16.08)/5)$	17.02
D	Adjustment factor $((c-5)/5)*0.95+1$	3.3

Step three – calculate minimum local housing need

	Component	Figure
E	Minimum local housing need (b*d)	1,574

Previous standard method calculation (no longer used)

Step one

	Component	Figure
A	2014-based household projections for 2024	57,714
B	2014-based household projections for 2034	62,375
C	Household growth between 2024 and 2034 (a – b)	4,661
D	Average household growth per annum between 2024 and 2034 (c / 10) – baseline housing need figure	466.1

Step two

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

Adjustment factor = (15.22 – 4 / 4) x 0.25 + 1 = 1.7

	Component	Figure
E	Median workplace-based affordability ratio (2023)	15.22
F	Affordability adjustment factor	1.7
G	Uncapped local housing need (d x f)	792.37

Step Three

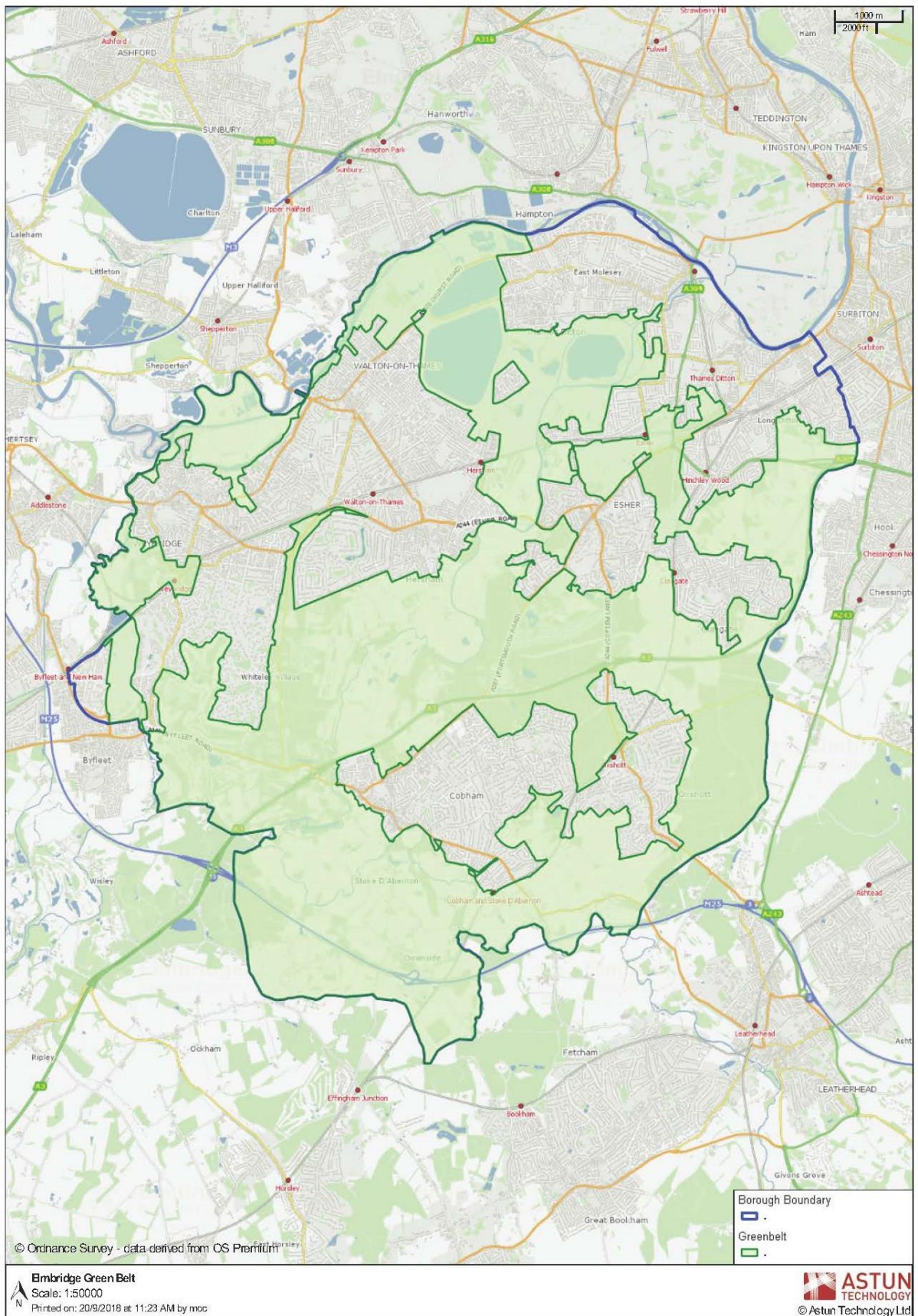
- 1.1 EBC's strategic housing policies were adopted more than 5 years ago in the Core Strategy. As such, the local housing need figure is capped at 40% above the baseline projected household growth.

	Component	Figure
H	Capped adjustment factor	1.4
I	Local housing need (d x h)	653 dpa

Step Four

- 1.2 Step four (cities and urban centers uplift) of the standard method involves applying an uplift 35% in locations that are within cities and urban centers. As Elmbridge is not within these designations step four does not apply in the Borough.

Appendix 2: Map of the Elmbridge Green Belt



Appendix 3: 5 year housing land supply

Housing requirement

- 1.1 The Council's adopted housing requirement set out in Policy CS2 of the Core Strategy adopted in July 2011¹⁷ is recognised to be out-of-date. Paragraph 78 of the National Planning Policy Framework (NPPF) states that where a housing requirement is out of date housing land supply position is to be assessed against the LHN calculated using the standard method.
- 1.2 The NPPF published in December 2024¹⁸ revised the standard method for calculating local housing need (LHN). Using the revised standard method and the latest data, Elmbridge has a LHN of 1,574 dwellings per annum (dpa). 1,574 dpa is therefore the base requirement for the calculation of a 5 year housing land supply (5YHLS) position in Elmbridge.
- 1.3 The latest (2023) Housing Delivery Test Measurement¹⁹, published in December 2024, shows 79% of the housing requirement in Elmbridge has been delivered in the past three years. In accordance with paragraph 78 of the NPPF, delivery of less than 85% means a 20% buffer is to be applied to the base requirement.
- 1.4 Paragraph 22 (ref. ID 68-031-20190722) of Planning Practice Guidance (PPG) on housing land supply²⁰ sets out that the standard method factors in past under-delivery and therefore there is no requirement to include an adjustment for past delivery shortfalls in calculating the housing requirement as part of a 5YHLS calculation.

Table 1: 5YHLS housing requirement

		Dwellings
A	Annual local housing need	1,574
B	Housing need over 5 years (A x 5)	7,870
C	20% buffer (20% x B)	1,574
D	Total requirement, 2025-30 (B + D)	9,444
E	Annualised requirement figure (D / 5)	1,889

¹⁷ [Elmbridge Borough Council Core Strategy, July 2011](#)

¹⁸ [National Planning Policy Framework \(NPPF\), December 2024](#)

¹⁹ [Housing Delivery Test: 2023 Measurement, December 2024](#)

²⁰ [Planning Practice Guidance, Housing Land Supply](#)

Housing land supply

1.5 The Council's supply of deliverable sites comprises the following:

Table 2: Housing land supply as at 31 March 2024

		Dwellings
A	Under construction	734
B	Planning permission (medium & large sites)	320
C	Planning permission (small sites)	196
D	Small site non-implementation discount (10%)	-20
E	Resolution to grant	350
F	Land availability assessment (LAA) / brownfield land register (BLR) sites	42
G	Windfall	83
H	Total deliverable supply [A + B + (C - D) + E + F + G]	1,705

5 year housing land supply

1.6 The Council has a 0.9 year (1,705 homes) supply of deliverable sites against the housing requirement set out above and is therefore unable to demonstrate a 5YHLS. The full calculation is set out in table 3 below:

Table 3: 5YHLS position

		Dwellings
A	Total requirement, 2025-30 (table 1)	9,444
B	Total supply (table 2)	1,705
C	5YHLS (A / B)	0.9 yrs