

Appendix A - Tandridge District Council

Housing Delivery Test Action Plan

May 2024

Glossary

Term	Definition
Areas of Outstanding Natural Beauty (AONBs)	Land protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty. It is areas of countryside that have been designated for conservation due to their significant landscape value.
Brownfield Land Register (BLR)	Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.
Call for Sites	An information gathering consultation exercise which gives landowners, developers, agents, site promoters and other interested parties an opportunity to suggest potential sites for development within the Council area.
Five-Year Housing Land Supply (5-YHLS)	A mechanism for development and forward-looking measure that assesses whether a Local Planning Authority has sufficient sites to meet its housing requirement over the proceeding five years.
Green Belt	National Policy that was introduced with the aim to control urban growth, preventing urban sprawl and to protect natural landscapes. Development in the Green Belt is heavily restricted and protected by National Policy with certain exceptions allowing for development to occur.
Housing Delivery Test	Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England annually.
Housing Delivery Test Action Plan	A Housing Delivery Test Action Plan is produced by a local planning authority when the results of the housing delivery test falls below 95% of the housing requirement. The plan assesses the causes of under-delivery and outlines measures to improve future delivery.
Housing Requirement	The assessment of how much new housing is needed to accommodate growth in a specific area. The standard method for calculating local housing need provides a minimum number of homes to be planned for, and authorities use this as a

Term	Definition
	starting point when preparing their housing requirement in the plan
Local Housing Need (LHN)	The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).
Local Plan	A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
National Landscape	A National Landscape is a designated exceptional landscape whose distinctive character and natural beauty are protected and enhanced for nature, people, business, and culture and comprise National Parks and Areas of Outstanding Natural Beauty.
National Planning Policy Framework	Published by Government in March 2012 and last updated in December 2023. It contains national policy guiding the preparation of Local Plans and is a material consideration in planning decisions.
National Planning Policy Guidance	Published by Government in March 2012 and regularly updated since. It contains national guidance to aid interpretation and application of national policy contained in the NPPF. It sets out the process for preparing Local Plans and is a material consideration in planning decisions.
Plan Period	A plan period refers to the duration during which a local plan is in effect and generally covers a 15-20 year period. Note that Local plans are reviewed every five years to assess whether they need updating based on changing circumstances and national policy changes.
Windfall Development	Sites not specifically identified in the development plan.

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1 Introduction

- 1 This document sets out the Housing Delivery Test Action Plan (HDTAP) for Tandridge District Council. This is in response to the requirement¹ that a Local Authority is to produce an action plan where its Housing Delivery Test (HDT) result falls below 95%.
- 2 The HDT measures housing delivery over a 3-year period against the established housing requirement. The HDT was introduced as part of the July 2018 National Planning Policy Framework (NPPF) revisions and is intended to help address the housing crisis by encouraging the delivery of more homes.
- 3 The HDT is a percentage measurement of the net number of homes delivered against the number of homes required by the Government in accordance with set criteria and within the area of the relevant plan-making authority². DLUHC publish the results annually demonstrating the previous three financial years measurement; with the 2022 measurement covering 2019/20, 2020/21, and 2021/2022.
- 4 On 23 December 2023 the results of the 2022 HDT were published. Tandridge District Council was identified as having delivered 38%³ of the required level and in accordance with para 79 of the NPPF, consequently must produce an Action Plan with subsequent 20% buffer added to the five-year housing land supply (5YHLS) calculation and the application of the presumption in favour of sustainable development⁴. The delivery and requirement is set out in Table 1:

Financial year	2019-2020	2020-2021	2021-2022	Total
Number of homes required	593	430	644	1,667
Number of homes delivered	268	117	246	631
+ /-	-325	-313	-398	-1,036
%				38%

TABLE 1: HOUSING DELIVERY TEST MEASUREMENT

* Note that the figures in the published HDT result differ from the completions set out in Table 4 - this is due to the availability of updated information. When using the figures determined by the Council, the delivery reduces to 37% with the number of homes delivered in the year 2019/20 as 262 and the number of homes delivered in 2021/22 as 238

¹ paragraph 79 of the National Planning Policy Framework (NPPF, December 2003)

² Housing Delivery Test measurement rule book - GOV.UK (www.gov.uk)

³ Housing Delivery Test: 2022 measurement - GOV.UK (www.gov.uk)

⁴ paragraph 79 (c) of the National Planning Policy Framework (NPPF, December 2003)

– this does not affect the requirement of the production of a HDTAP, the inclusion of a 20% buffer added to the LHN, and the application of the presumption in favour of sustainable development.

1.2 Purpose

5 The purpose of this HDTAP is to present an update to the previous iterations of the HDTAP (2021 and 2022) and to identify what measures the Council will take to improve housing delivery.

1.3 Approach

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

1.4 Scope of Report

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

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

2 Policy Context

2.1 National Planning Policy Framework (NPPF)

2.1.1 Housing Delivery Test

- 8 The HDT was first included in the 2018 NPPF revision and has since been included in all subsequent iterations. The policy states the repercussions for an authority's failure to meet the required level of development ascertained through the HDT calculation. Currently para 79 of the NPPF (December 2023) states:

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

a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;

b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 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.'

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

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

2.1.2 Five-Year Housing Land Supply (5YHLS)

- 10 In accordance with paragraph 76 of the NPPF, unless specific criteria are met, Local Planning Authorities are required to annually publish their 5YHLS:

'Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met:

- a) their adopted plan is less than five years old; and
- b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.’

11 Paragraph 77 goes on to expand upon the requirements set out on paragraph 76, stating:

‘In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years’ worth of housing, or a minimum of four years’ worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).’

2.1.3 Local Housing Need

12 Paragraph 61 of the NPPF sets out how Local Housing Need should be calculated:

‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.’

13 The Standard Method requires the use of 2014-Household projections to determine a Local Housing Need figure. For the purpose of plan-making, this figure is an advisory starting point.

2.2 Planning Practice Guidance (PPG)

14 The *Housing Supply and Delivery*⁵ section of the PGG further expands upon the requirement of the NPPF and provides information regarding how the HDT⁶ is applied and additional guidance regarding the production of a HDTAP⁷, how this should be produced and what it should include.

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

- small and large developers;
- land promoters;

⁵ Housing supply and delivery - GOV.UK (www.gov.uk)

⁶ Paragraph: 036 Reference ID: 68-036-20190722 - Paragraph: 046 Reference ID: 68-046-20190722

⁷ Paragraph: 047 Reference ID: 68-047-20190722 - Paragraph: 054 Reference ID: 68-054-20190722

- private and public land owners;
 - infrastructure providers (such as utility providers, highways, etc) and other public bodies (such as Homes England);
 - upper tier authorities (county councils) in two-tier areas; and
 - neighbouring authorities with adjoining or cross-boundary sites.
- 16 The guidance goes on to state what a Local Authority could review as part of the Action Plan, examples of which comprise:
- barriers to development commencement and delivery on sites identified as part of the 5YHLS;
 - whether sufficient planning permissions are being granted within statutory time limits;
 - whether the mix of sites identified is proving effective; and
 - the level of ongoing engagement with key stakeholders.
- 17 Additionally, the guidance provides information on what a Local Authority could consider as part of the Action Plan in order to boost delivery, including:
- revisiting the Housing and Employment Land Availability Assessment (HELAA) and carrying out further Call for Sites exercises;
 - revising the site allocations policy within the development plan;
 - working with developers on the phasing of sites; and
 - using the Brownfield Land Register to grant permission in principle.
- 18 Finally, the guidance advises on when the Action Plan should be published, and the monitoring responsibilities of the authority.

2.3 Historical Policy Context

- 19 It should be noted that previous iterations of the HDTAP and 5YHLS have presented and used housing delivery positions that were resultant of the Housing Provision (for purpose of calculations) presented in the adopted 2008 Core Strategy⁸ of 125 dpa. This was adopted under the previous policy framework: Planning Policy Statement 3, whereby housing provision is established using *'the Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts'* (PPS3 para 33 2006). The NPPF was introduced in 2012 to consolidate and replace previous Planning Policy Statements whereby it states at the first bullet point of paragraph 47:

*To boost significantly the supply of housing, local planning authorities should:
use their evidence base to ensure that their Local Plan meets the full,
objectively assessed needs for market and affordable housing in the housing*

⁸ Adopted development plan - Tandridge District Council

market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period

The determination of housing need has since been amended in later editions of the NPPF and the latest position is as set out above.

2.3.2 Implications of Policy Context

- 20 As set out in the Introduction, the latest published HDT result for Tandridge falls below 75%, therefore NPPF (December 2023) paragraph 79c applies within the district, i.e.
- Presumption for sustainable development is in force in terms of decision taking for planning applications.
 - A 20% buffer must be applied to the calculation of the 5YHLS.
 - A HDTAP must be prepared.
- 21 Housing delivery is monitored in the Council's Authority's Monitoring Report (AMR⁹). 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.
- 22 The latest iteration of the AMR tests the Housing Supply position against the Local Housing Need established via the Standard Method (Table **) in line with National Policy and Guidance.
- 23 As the Core Strategy was adopted in excess of five years ago, the Council are required to identify development sites providing a 5-YHLS. The NPPF (December 2023) and PPG set out how Councils should calculate its 5-YHLS. Where strategic policies are more than five years old, this supply must be based on Local Housing Need (calculated using the Standard Method) until such a time that a new housing requirement figure is established through a local plan examination. It is worth noting that the Local Housing Need figure does not have regard to major policy constraints to development such as those identified later within this document and consistently through each iteration of the NPPF, including the Green Belt. Consequently, Tandridge is judged as underperforming in terms of housing delivery.

⁹ Monitoring - Tandridge District Council

3 Relationship to Other Council Strategies and Plans

- 24 The Action Plan is informed by a range of other existing Council strategies and plans that aim to encourage housing and economic growth. These include:
- **Housing Strategy 2019-2023**¹⁰ – The Housing Strategy sets out the Council’s vision and plans for housing for the next five years. It identifies the challenges the Council faces in its enabling role as a builder of new homes, as a landlord in the context of a growing and ageing population, changing government policies, a high-cost housing market and a challenging economic climate.
 - **Strategic Plan 2020/21 to 2023/24**¹¹ – The Strategic Plan is a corporate document which sets out what the Council will deliver for local residents and businesses in the coming months and years. The plan will be continuously reviewed in line with progress made in implementing our corporate improvement plan. An important part of this work is to develop the Council’s new values and behaviours which will inform the way the actions in the Strategic Plan are delivered.
 - **Interim Policy Statement for Housing Delivery**¹² – Previous iteration of the HDTAP introduced the Interim Policy Statement for Housing Delivery, which was adopted at Planning Policy Committee on 22/09/22. The document provides criteria for Development Management to assess planning applications against and determine accordingly.
 - **Adopted development plan**¹³ – The Tandridge Development Plan is formed of the Tandridge District Core Strategy 2008, Tandridge Local Plan Part 2: Detailed Policies 2014-2029, Caterham, Chaldon & Whyteleafe Neighbourhood Plan 2021, Limsfield Neighbourhood Plan 2019, Tatsfield Neighbourhood Plan 2024 and Woldingham Neighbourhood Plan 2016, as well as the Surrey Waste and Minerals Plans. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require decisions to be taken in accordance with the development plan, unless there are material considerations that indicate otherwise.

3.2 Local Plan Review

- 25 Tandridge District Council submitted ‘Our Local Plan 2033’ for independent examination in January 2019. The Inspector’s Report was published on the 20 February 2024, bringing the examination to a close. The Inspector’s final recommendation was that the submitted plan should not be adopted due to soundness issues.

¹⁰ [Strategies, plans & policies - Tandridge District Council](#)

¹¹ [Strategies, plans & policies - Tandridge District Council](#)

¹² [Monitoring - Tandridge District Council – See Appendix 1 HDTAP 2022](#)

¹³ [Adopted development plan - Tandridge District Council](#)

- 26 Subsequently, Tandridge District Council resolved to withdraw the draft Local Plan 'Our Local Plan 2033' at Full Council on 18 April 2024.¹⁴ The Council is currently in the early stages of a Local Plan Review following the resolution to withdraw the emerging Local Plan 2033. An appropriate spatial strategy and housing requirements for the new plan-period has yet to be established. Therefore, the Council are not in a position to address the immediate housing need through the plan-making process and are subsequently reliant on the existing Interim Policy Statement for Housing Delivery until such time as a new Local Plan has made sufficient progress for it to be a material consideration in decision-making.

¹⁴ [Withdrawn Local Plan - Tandridge District Council](#)

4 Housing Need, Land Supply and Completions

4.1 Housing Need

- 27 For the purpose of this document, the LHN equates to 634 dpa devised using the Standard Method as of May 2024, as shown in Table 2:

Household Projections	
2024 Household projections	39,219
2034 Household projections	43,750
Housing Need	
Baseline figure	453.10
Affordability ratio	12.38
Adjustment factor	1.52
Minimum annual LHN	690.41
Capped LHN	634.34
Final LHN	634

TABLE 2: LOCAL HOUSING NEED (STANDARD METHOD) 2024-2029

4.2 Housing Land Supply

- 28 The latest published 5YHLS figure (AMR 2023-2024¹⁵) demonstrates 1.92 years' worth of housing delivery for the 5YHLS period as of April 1 2024, which is equivalent to a shortfall of 2,341 homes, as shown in Table 3:

Component	Output
Standard Method annual requirement	634
Annual requirement (+ 20% buffer)	761
Five-year requirement (including buffer)	3,805
Total Supply	1,464
Over / under provision	-2,341
Total years supply	1.92

TABLE 3 : 5YHLS POSITION

- 29 It should be noted that there are three applications that are not currently contributing to the supply. These have a resolution to grant planning permission, however section 106 agreements are currently being drafted, so cannot be formally included within the supply figures. Once these have been agreed, the supply would increase by a total of 410 dwellings, equivalent to an additional 0.54 years to the 5YHLS. The Council will be producing a statement updating the 5YHLS position, during the Autumn 2024.

¹⁵ Monitoring - Tandridge District Council

5 Housing Completions

- 30 Table 4 demonstrates the net number of homes that have been delivered since 2006 (the start of the adopted Plan Period) - **note that the completions data for years 2019-20, 2020-21, and 2021-22 were used for the latest HDT.**
- 31 Table 4 and Figure 1 identify an uptick in completions in the last three years following the significant drop during the initial wave of Covid-19 and with completions averaging since Covid-19 at 260 against an annualised overall average of delivery per year at 251 dwellings. This is an encouraging sign that housing delivery is realigning with that of pre-pandemic levels.
- 32 When compared against the housing provision in the adopted Core Strategy (2008) of 125 dwellings per year (2006 – 2026 plan period), it is clear that the Council has consistently met and exceeded this requirement (with the exception of 2020/21 the first year of the Covid-19 pandemic). It is also evident from Fig 1 that since the increased delivery of 459 dwellings during 2006/07, the overall development in the district is on an upward trend.

Year	Total Per Year	Cumulative Total
April 2006 – March 2007	459	459
April 2007 – March 2008	285	744
April 2008 – March 2009	297	1,041
April 2009 – March 2010	172	1,213
April 2010 – March 2011	132	1,345
April 2011 – March 2012	261	1,606
April 2012 – March 2013	221	1,827
April 2013 – March 2014	256	2,083
April 2014 – March 2015	142	2,225
April 2015 – March 2016	322	2,547
April 2016 – March 2017	228	2,775
April 2017 – March 2018	332	3,107
April 2018 – March 2019	244	3,351
April 2019 – March 2020	262	3,613
April 2020 – March 2021	117	3,730
April 2021 – March 2022	238	3,968
April 2022 – March 2023	303	4,271
April 2023 – March 2024	238	4,509
Average:	251	

TABLE 4: DWELLING COMPLETIONS

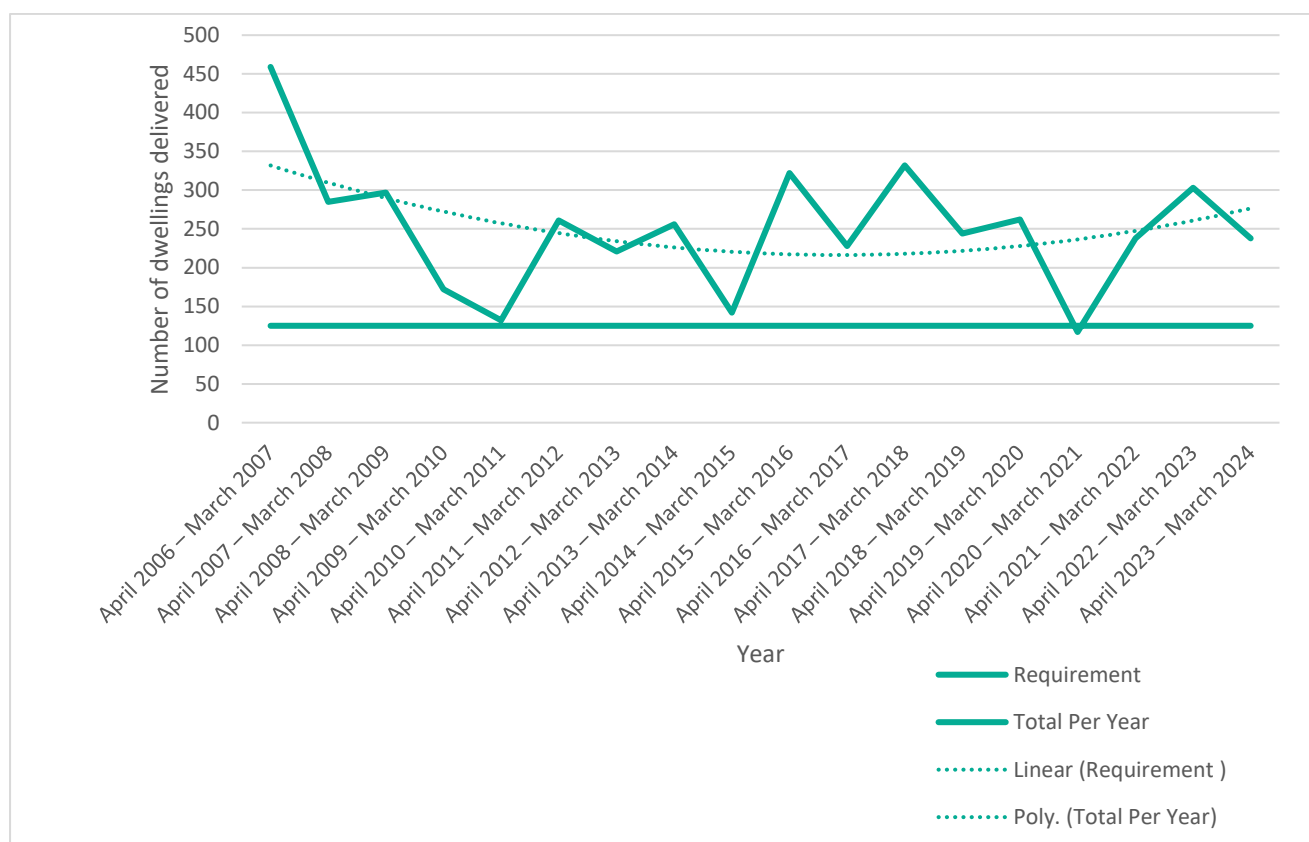


FIGURE 1: ANNUAL NET DWELLINGS COMPLETED

5.2 Windfall Development

- 33 Windfall development is defined as “Sites not specifically identified in the development plan” in the current edition of the NPPF (December 2023). Therefore, as the Council do not have an up-to-date development plan or adopted Site Allocations Development Plan Document, notwithstanding potential development allocations within Neighbourhood Plans, all development should be considered as ‘windfall’.
- 34 Previous iterations of the HDTAP and the AMR in relation to Housing Supply have considered windfall developments as those that comprise small sites, in particular sites of 4 dwellings or fewer. The previous HDTAP also did not include development within residential garden land in their windfall calculations – this was a legacy policy from the 2012 NPPF which was categoric in its omission. Since the 2018 NPPF update, this is no longer the case with there being no requirement to omit residential garden land from calculations. Subsequently future housing supply calculations will now include residential garden land, and all planning permissions regardless of site capacity, until such a time as a new development plan including sites for allocation is adopted and / or national policy is amended.

- 35 Further to this, the Council can no longer rely upon the housing provision set out in the adopted Core Strategy (125dpa) due to the age of the document and should therefore use the most up-to-date and relevant guidance, that being the current NPPF. It should also be noted that the Council previously relied upon the 2012 NPPF for a number of years as 'Our Plan 2033' was being produced and examined under the 2012 NPPF; this is now no longer the case.
- 36 Table 5 presents the Windfall development position from the monitoring years 2013/14 to 2023/24. The start date of 2013/14 is used due to evidence from the 2013 AMR demonstrating that this was the point that all but one previously allocated site had been completed. The Council therefore deem this as an appropriate point to determine their windfall contribution. As the final allocated site was completed during the period 2020 – 2023, the total number of completions on this site has been deducted from the total completions to avoid double counting.

Year	9 or fewer units	10 or higher units	TOTAL
2013 - 2014	112	144	256
2014 - 2015	54	88	142
2015 - 2016	88	234	322
2016 - 2017	36	192	228
2017 - 2018	116	216	332
2018 - 2019	110	134	244
2019 - 2020	74	188	262
2020 - 2021	82	35	117
2021 - 2022	48	190	238
2022 - 2023	37	266	303
2023 - 2024	92	146	238
TOTAL	849	1,833	2,682
Minus 111 from app 2018/729		1,722	2,571
Average	77	157	234

TABLE 5: WINDFALL COMPLETIONS

- 37 The windfall analysis shows a total of 2,571 dwellings were completed over the 11-year period (2013 – 2024) or an average of 234 dwellings per year. The data was further split into two groups: completions on small sites i.e., 9 units or fewer; and

completions on Major Development Sites i.e., sites of 10 units or higher. The assessment demonstrates that there were 849 completions on small sites and 1,722 on large sites.

- 38 On the basis of this windfall analysis, for the purpose of 5-YHLS calculations the Council can include 23 dwellings per year on to years 4 and 5 of the 5YHLS period. Note years 1 – 3 of the 5-YHLS comprise planned for or established development (in the context of the Tandridge District Council position, ‘planned for’ relates to development already permitted).

5.3 Lapsed Sites

- 39 The supply and completions analysis has identified a number of unimplemented (lapsed) planning permissions (Table 6). The analysis has demonstrated that 2,682 net units have been completed (delivered) since 2013 while 186 net units permitted have lapsed in this time. The level of lapse against completions is therefore 6% and presents a small proportion of the total housing permitted, whilst also demonstrating that the majority of permissioned sites coming forward are being built out.

Monitoring Year	Total Net Units Completed (Delivered)	Net Units Lapsed	Percentage Lapsed Within the Year
13/14	256	8	3%
14/15	142	13	8%
15/16	322	26	7%
16/17	228	5	2%
17/18	332	10	3%
18/19	244	12	5%
19/20	262	4	2%
20/21	117	47	29%
21/22	238	39	14%
22/23	303	22	7%
23/24	238	0	0%
Total	2,682	186	6%

TABLE 6: NET NUMBER OF UNITS LAPSED

- 40 Circumstances that result in a lapse of permission vary with reasons such as unknown site issues, and financial collapse being prevalent of which there is little the Council

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

5.4 Interim Policy Statement for Housing Delivery

- 41 The previous iteration of the HDTAP introduced the Interim Policy Statement for Housing Delivery – this policy was adopted at Planning Policy Committee and provides criteria for Development Management to assess planning applications against and determine accordingly. It is an important material consideration in the determination of planning applications. The document expressed support for the proposed allocations included in the 'Our Local Plan 2033' where the Examiner did not raise concerns. Potential sites must also be deliverable and viable: having regard to the provision of any necessary on-site and off-site infrastructure, affordable housing requirements, payment of the Community Infrastructure Levy; and accord with the policies in the adopted development plan.
- 42 Table 7 provides information regarding two sites identified in the IPSHD for a cumulative total of 190 dwellings. Note that the 156-180 Whyteleafe site is split across three permissions. Much of the 156-180 Whyteleafe permission has been completed with the remaining dwellings contributing to the latest 5YHLS. Planning permission 2021/2178 has yet to start, however, is expected to be delivered throughout the 5YHLS period.

Site	Capacity	Planning Status	Current Status
156-180 Whyteleafe Road, Caterham	90	2019/1699 - 156 - 170 Whyteleafe Road – 34 dwellings	Near completion
		2019/325 - 170 Whyteleafe Road – 14 dwellings	
		2019/1742 - 172 Whyteleafe Road – 42 dwellings	
Land West of Limpsfield Road, Warlingham	100	2021/2178 - Planning permission granted at appeal (APP/M3645/W/22/3309334) for part of the site. Remainder of the site still available.	Not started

TABLE 7: SITES IDENTIFIED IN THE IPSHD WITH PLANNING PERMISSION

- 43 Table 8 presents the sites that have the potential for delivery as a result of the IPSHD, two of which have recently been permitted and are currently negotiating S106

contributions. In total the five sites have the potential to deliver 812 dwellings of which would contribute to 1.07 years of housing delivery when considered in the context of the 5YHLS.

Site	Capacity	Planning Status	Current Status
Land North of Plough Road, Small Field	120	Planning application 2022/1658 approved at committee on 7/12/23, referred to Secretary of State as a departure; not called in.	S106 currently being drafted
Former Shelton Sports Ground, Warlingham	150	Planning application number 2022/267 approved at committee on 7/12/23, referred to Secretary of State as a departure; not called in.	S106 currently being drafted
Land at Plough Road and Redehall Road, Smallfield	160	None	N / A
Land West of Limpsfield Road, Warlingham	90	Site partially available - remainder has already secured planning permission.	N / A
Land west of Red Lane	60	None	N / A
Warren Lane Depot	50	None	N / A
Land at Green Hill Lane and Alexandra Avenue	50	None	N / A
Land at Farleigh Road	50	None	N / A
North Tandridge One Public Estate	82	None	N / A

TABLE 8: REMAINING IPSHD SITES

5.5 Summary

- 44 In summary, the analysis set out in this section demonstrates that the delivery of homes in the district has not previously been an issue when assessed against the LHN in the adopted Core Strategy 2008. This approach however differs with the latest national policy and therefore the Council are required to establish the LHN against the unconstrained, Standard Method.
- 45 The Standard Method has resulted in a LHN of 634 dwellings pa – this figure does not consider the constraints to development in the District, of which will be addressed as part of the plan review. The use of the Standard Method to determine LHN, as a result of strategic policies exceeding 5 years in age, has implications on the Council's ability to demonstrate a 5YHLS.

- 46 The Council has however consistently delivered housing that has exceeded the provision set out within the Core Strategy, with an average of 251 dwellings delivered per annum. It should also be noted that following the increased delivery in the first year of the plan-period (2006/07), the Council's delivery of housing is on an upward trajectory.
- 47 Previous iterations of the 5YHLS and HDTAP acknowledged the contribution windfall development makes towards the Council's housing supply. However changing circumstances relating to revised national policy and the withdrawal of 'Our Local Plan 2033' have allowed the Council to present a refined assessment of windfall aligned with the latest policy and guidance. This has been reflected in the latest 5-YHLS calculation and provides an accurate account of the level of windfall contribution that can be included in the Council's supply figures resulting in 234 dwellings for years 4 and 5 (468 total) of the supply period.
- 48 It should also be noted that there is a very low rate of permission lapse signifying that once permission is granted, it is likely that development will be built out, with an average of 6% of total units not coming to fruition.
- 49 As part of the previous HDTAP, to increase housing supply and delivery in the District, the Council adopted an *Interim Policy Statement for Housing Delivery*. The document has the potential to deliver in excess of 1,000 dwellings with circa. 190 dwellings committed / delivered since its inception. The statement is also an important material consideration in decision-taking.

6 Identification of Root Causes of Current Delivery Position

50 This section of the report provides the current context for the Council's housing delivery position, and the constraints within the District. The constraints presented are serious and very real barriers to development, and heavily restrict the Council's housing delivery; these constraints will be considered in determining a housing requirement for the plan review:

- **Planning Designations: Green Belt** – the Green Belt extends to some 94% of the district of which development within is heavily restricted with only certain exceptions allowed under para. 154 of the NPPF (December 2023); the Council does have the ability to review the Green Belt under para. 145 of the NPPF as part of the Local Plan Review, however the Council must demonstrate exceptional circumstances to do so and have the strategy tested during the Local Plan examination.
- **Planning Designations: AONB** – The Council is also subject to the Surrey Hills and High Weald Areas of Outstanding Natural Beauty (AONB) (covering 12% and 4% respectively) whereby development is restricted under paragraphs 182 and 183 of the NPPF. Furthermore, the district is subject to protections of Area of Greater Landscape Value (AGLV) amongst other landscape designations. The extent of the Surrey Hills AONB in the Tandridge district is under review and, if further extended, will provide additional constraint on the Council's ability to bring land forward for development.
- **Infrastructure Constraints** – Cumulative impact on infrastructure from historic development. In addition, there have been limited contributions to help alleviate and improve existing infrastructure in and across the district. As work on the withdrawn Local Plan demonstrated, J6 on the M25 is now almost at capacity and increasing problems at key junctions on the A22 which are operating at capacity at peak times are hampering growth both within the district and in surrounding areas. A HIF bid to address the M25 Junction 6 issues was previously submitted. However, this was turned down and no alternative funding source has been identified. It is unlikely that development that has the potential to lead to a severe impact on the junction, will occur.

6.2 Local Plan Status

51 Another key issue that has prevented housing delivery and limits the ability for the Council to adequately plan for development is the status of the Local Plan. The adopted Core Strategy (2008) is out-dated; consequently, the Council are unable to test their housing delivery against the adopted housing requirement of 125 dwellings per year.

- 52 In line with paras. 76 and 77 of the NPPF, where an adopted plan is in excess of 5 years old, and where strategic policies are over 5 years old, the Council is required to test their housing supply against the Local Housing Need established using the Standard Method. As stated earlier in this document, this results in an unconstrained figure of 634 dwellings to be delivered per year.
- 53 The Government methodology for calculating housing needs is a 'policy off' approach. It is an unconstrained assessment of the number of homes needed in an area and is the first step in the process of determining how many homes need to be planned for. It does not factor in key nationally important constraints to development such as Green Belt and AONB that affect the district and locally important infrastructure constraints which the Council has limited ability to resolve. Given the extent of these constraints it is considered unreasonable for the Council to meet its full housing need as identified using the standard method; the objectively assessed housing need assessment presents an inaccurate view of the realities of housing delivery for Tandridge District Council.

7 Response and Action Plan

54 The Council's Housing Delivery Test Action Plan is set out below, responding to the *Housing Delivery Analysis* in Section 5 and on reflection of the *Identification of Causes* set out in Section 6. The action plan demonstrates what the Council has carried out since the previous HDTAP iteration, progress made, and actions going forward:

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Interim Policy Statement for Housing Delivery	Delivery of site-specific allocations	Policy statement allows for the delivery of site allocations that were proposed in 'Our Local Plan 2033' where the examiner did not raise concerns – this will be a consideration during the determination of planning applications	AMR / HDTAP / 5YHLS assessment	High	Immediate / Ongoing	This action has seen the delivery of circa. 90 units and the permission of 100. A further 270 units have been permitted and are awaiting the resolution of S106 discussions. A further 542 units have the potential for delivery through the permitting of potential allocations.
Interim Policy Statement for Housing Delivery	Site-based criteria to assess applications against	In order to boost housing supply, the policy statement provides criteria to assist decision making – this will be a consideration during the determination of planning applications	AMR / HDTAP / 5YHLS assessment	High	Immediate / Ongoing	The document was adopted at Planning Policy Committee on 22/09/22 and has been in use since this date – the document is generally relied upon in decision making.
Local Plan Review	Production of Local plan	Following the withdrawal of 'Our Local Plan 2033' the Council are embarking on the production of a new development plan – this will see the production of a new	AMR	High	0 – 5 years	The Council is at an early stage of the plan-making process and are currently updating the Local Development Scheme in order to establish a timeline for plan delivery.

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		planning strategy and become a material consideration in the determination of planning applications and will see the production of new evidence base documents				
Local Plan Review	HELAA update	The Council has begun the preparation of a new HELAA to identify potential land for housing allocation – subject to the adoption of the updated HELAA methodology, the sites will undergo further assessment to establish the potential for delivery and due consideration as potential allocations within the new Local Plan.	AMR	High	0 – 5 years	An updated methodology is in production as of May 2024 and a call for sites exercise was carried out during 5 February 2024 – 17 March 2024; this process produced 261 site submissions of which, subject to the adoption of the updated HELAA methodology, the sites will undergo further assessment to establish the potential for delivery.
Local Plan Review	Duty to Cooperate	Requirement for plan-making - the Council will engage with its neighbours and other prescribed bodies and also engage with Surrey County Council and National Highways in relation to highways matters.	AMR	High	0 – 5 years	The Council is at an early stage in the plan-making process. It has started t Duty to Cooperate discussions
Local Plan Review	Housing Needs Assessment	The Council will commission an update to the existing Housing Needs Assessment of which test	AMR			The Council is at a very early stage in the plan-making process and is due to start the process of evidence base

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		model scenarios for housing delivery and allow the Council to adequately assess and determine an appropriate housing figure that considers the constraints the Council is working against and will allow for an appropriate delivery strategy.				documents update imminently – the housing need figure would need to be presented within the emerging plan and once submitted to the Inspectorate, potential weight can be attached and become a material consideration in the determination of planning applications; to confirm the final position and allow the Council to test their housing delivery and supply against, the housing figure will need to be presented and tested through the examination process, and subsequent adoption.
Local Plan Review	Transport Assessment	The Council will undertake transport assessments to assess the network capacity and potential highway interventions to alleviate issues presented, when evaluated against the allocations in the plan.	AMR	Medium	0 – 5 years	Surrey County Council is currently undertaking an assessment of the A22. Further transport assessments will be undertaken depending on site allocations
Planning Policy	Brownfield Land Register	The Council has recently undertaken an update to the Brownfield Land Register for which a Call for Sites was carried out (December 2023- January	AMR	Medium	Ongoing	Following assessment of the site submissions to review the potential for delivery and to assess whether the sites meet the criteria to be included within the register, 10 sites were removed from the process with 16 sites

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		2024) which produced 26 site submissions.				subsequently being included on Part 1 of the BLR. Cumulatively the site area equates to circa. 24.12 hectares with the potential delivery capacity of 548 dwellings – currently the Council only includes land on Part 1 of the BLR – the Council will consider potential allocation in the future under Section 5 (4) (b) of BLR Reg 2017 by including sites on Part 2 of the register granting them automatic Permission in Principle.
Continuation Measures from Previous HDTAP	Planning Performance Agreements	The Council will work towards the use of PPAs to ensure the prompt consideration of planning applications for new housing and to ensure that specialist consultancy services are at hand to enable the Council to determine applications in a prompt manner.	HDTAP	Medium	Ongoing	The previous HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor these.
Continuation Measures from Previous HDTAP	Continued Pre-Application Services	The Council has re-commenced pre-application consultation services as of October 2021 to assist developers in bringing forward suitable sites for housing development and	HDTAP	Medium	Ongoing	The previous HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor these.

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
		enhance the speed at which applications can be dealt with. The Council will continue to fund this service as part of its objective to encourage further housing development in the district.				
Continuation Measures from Previous HDTAP	Public Sector Role	Historically the Council had a limited role to bring forward housing. However, in recent years, the Council has begun to realise its aspiration to deliver its own homes and is now actively promoting and delivering a council-housebuilding programme.	HDTAP	Medium	Ongoing	The previous HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor these.
Continuation Measures from Previous HDTAP	Diversify Market Opportunities	On 15 January 2019 members of the Housing Committee adopted the Council's Housing Strategy 2019-2023. 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.	HDTAP	Medium	Ongoing	The previous HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor these.

Ref	Action	Commentary	Monitoring	Priority	Timescale	Progress
Continuation Measures from Previous HDTAP	Greater Direct Public Sector Role	The Council's Strategic Asset Management team are leading on building and managing the Council's property portfolio and delivering housing development. 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.	HDTAP	Medium	Ongoing	The previous HDTAP introduced a number of measures in an attempt to increase housing delivery across the district – the Council will continue to monitor these.

8 Monitoring Arrangements

- 55 The actions summarised above set out the work the Council will aim to undertake. The Action Plan will be monitored and reviewed by the Planning Policy Team on an annual basis when the publication of the HDT results is available.
- 56 Information relevant to the Action Plan will be collected from a range of sources such as the AMR, IDP, Housing Topic Paper, Housing Strategy, Strategic Plan, and any other relevant documents.