

Epsom & Ewell Borough Council

Housing Delivery Action Plan

September 2020

1 Introduction

- 1.1 Central Government has committed to addressing the growing housing need in the Country and has set a target of delivering 300,000 homes a year by the mid 2020s. The publication of the revised National Planning Policy Framework and Planning Practice Guidance in 2019 maintains measures on Local Planning Authorities with the aim of increasing housing delivery, including the Housing Delivery Test (HDT).

Purpose of this document

- 1.2 The Council is required to prepare an Action Plan explaining how it will improve housing delivery following the results of the [Housing Delivery Test](#) (HDT) published in 13 February 2020. It has six months to make this Action Plan.
- 1.3 The HDT measures the number of homes delivered in the previous three years against the housing required in this period¹. This is the second year of the test following the publication of the new National Planning Policy Framework (NPPF) and Planning Practice Guidance 2018.

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

Figure 1:Housing Delivery Test formula

- 1.4 It should be noted that there is a transitional period whereby the housing numbers that form the basis of the test will increase for the first three years². The results of the 2019 HDT is set out in Figure 2.

¹ Determined by the formula outlined in the [HDT:2019 Measurement Technical note](#)

² Paragraph 215 NPPF

	Number of homes required			Total number of homes required	Total Delivered 2016-2019	HDT Result 2019
	2016-2017	2017-2018	2018-2019			
Epsom and Ewell	383	413	577	1373	673	49%

Figure 2: Housing Delivery Test 2019 Results (as published by [MHCLG 13 Feb 2020](#))

- 1.9 The HDT result shows that within Epsom & Ewell Borough 49% of housing required in the past three years was delivered. The results mean the following measures for the Borough:
- The housing delivered is below the 85% threshold set footnote 39 in relation to paragraph 73 of the NPPF, therefore the Council is required to; identify a supply of deliverable sites including an additional 20% buffer (moved forward from later in the plan period)³
 - The housing delivered is below the threshold of 95% and as set paragraph 75 of the NPPF the Council has to prepare an action plan to identify actions to increase delivery in future years.
- 1.10 This Action Plan is prepared as a result of the latter of the two measures. Figure 3 shows diagrammatically the consequences of the Borough Council failing to demonstrate sufficient delivery against the requirement.

³ NPPF Paragraph 73 (c). Epsom & Ewell is unable to demonstrate the minimum requirement for housing land supply and therefore has to identify an additional supply of sites in order to deliver 695 dwellings per annum. The 20% buffer will remain in place until the Borough Council is able to demonstrate that delivery for the previous three years exceeds 85% of the requirement.

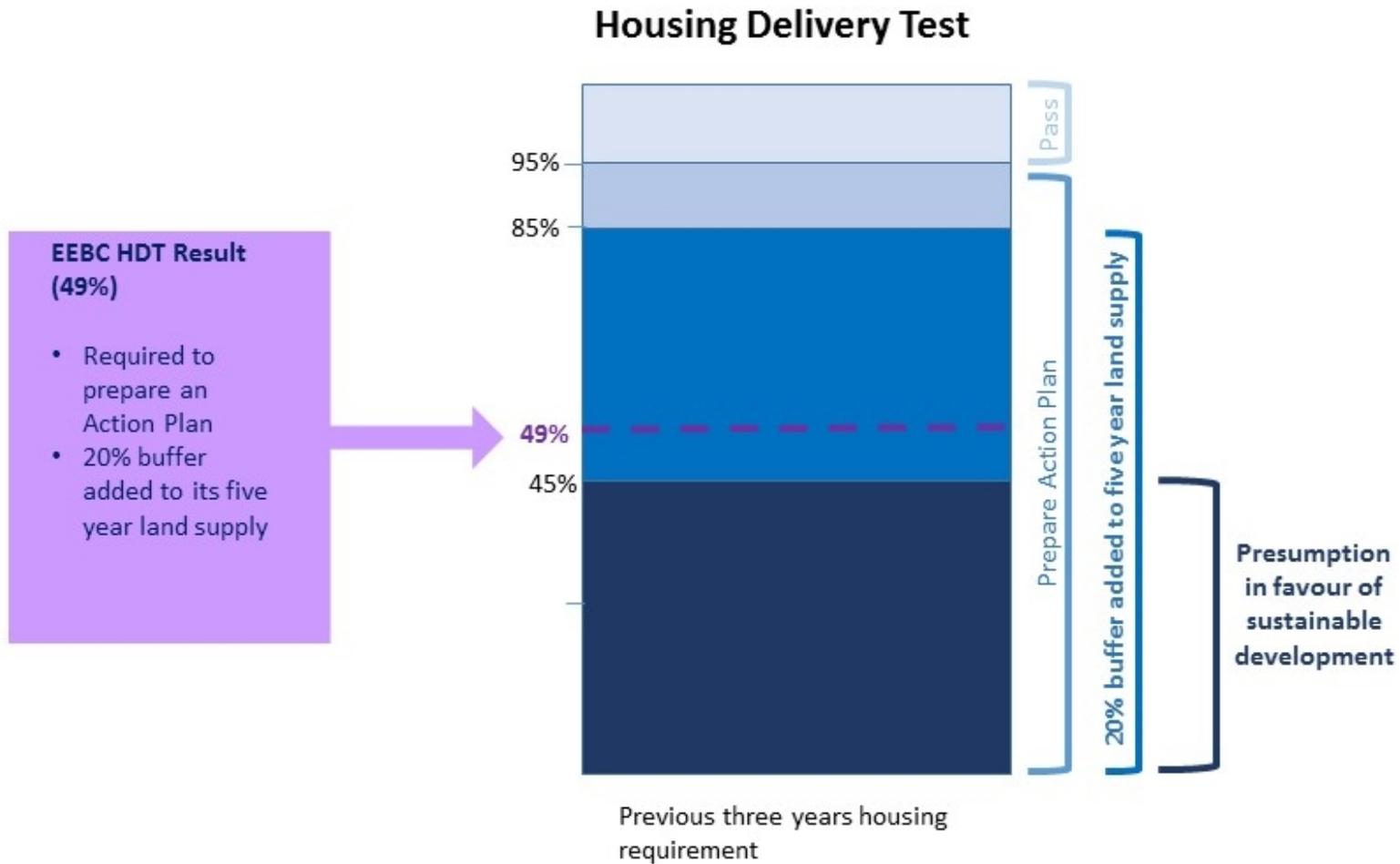


Figure 3: Diagram that outlines the level of housing EEBC has delivered in the context of the thresholds whereby measures apply.

- 1.11 The Housing Delivery Test is published annually by central government. This is the second year Epsom & Ewell Borough Council has been caught by the measures of the Housing Delivery Test, and essentially this is an update of the actions identified previously.

2 Context

Epsom & Ewell Local Plan

- 2.1 The existing Development Plan for Epsom & Ewell Borough comprises the:
- Surrey Minerals Plan,
 - Surrey Waste Plan,
 - [Core Strategy 2007](#),
 - [Plan E 2011](#): Area Action Plan for the Town Centre
 - [Development Management Policies](#) (2015).
- Sitting alongside these are various SPDs and guidance
- 2.2 The Council is in the process of preparing a new Local Plan, including compiling and producing an up to date [evidence base](#) to inform its strategy and policies.
- 2.3 The scale of the housing need has been calculated to be 579 per annum⁴. This is significantly higher than previously identified and poses a challenge in terms of delivery.
- 2.4 The Council's timetable⁵ for the preparation of the Local Plan is available on the [Council's Local Plan webpage](#). This was last updated in August 2020 and seeks to ensure a clear spatial development strategy is published as soon as possible to ensure development proposals that come forward are considered through a proper plan led approach. It is likely that the timetable will need to be updated to reflect current Covid-19 pandemic and the implications this has had to the Planning system.
- 2.5 The last [public consultation was a Regulation 18 consultation](#), carried out between October-November 2017. A further Regulation 18 consultation was due for May-June 2020. This has now been delayed.

⁴ The standard method produces a housing need of 579 per annum for (based on the 2014 Household projections).

⁵ Known as Local Development Scheme LDS

Other plans and strategies

- 2.6 Whilst the Local Plan will form the key delivery mechanism for development in the Borough it does not stand alone. It sits under the Corporate Plan and alongside other Council Strategies. The Council recently adopted a Four Year Plan identifies a number of key priorities for the Borough in the next four years under five themes:
- Green and Vibrant
 - Opportunity and Prosperity
 - Cultural and Creative
 - Safe and Well
 - Smart and Connected.
- 2.7 The priorities identified include a priority that progress is being made on housing needs and the implementation of the Local Plan. The full Four Year Plan is available [here](#).
- 2.8 The preparation and implementation of the Housing Delivery Action Plan has been in partnership with Officers across the Council from various departments including, Planning, Housing, Property and Regeneration and Health and Wellbeing. All have had input into the preparation of the Action Plan.

3 Root cause analysis

- 3.1 The previous Action Plan provided an extensive root cause analysis and it is not intended that these will be repeated here, instead the section will focus on any significant changes that have occurred since the last Action Plan.

Coronavirus

- 3.2 Coronavirus (Covid-19) is a newly discovered infectious disease that has spread and been declared a pandemic in early March 2020. The UK Government introduced measures to reduce the spread of coronavirus on the 23 March 2020, requiring people to stay at home where possible and introducing measures to 'social distance'.
- 3.3 The pandemic has had significant impact on all aspects of day to day life, including how the Council operates and how it makes its decisions. The [advice](#)⁶ from Government in March 2020 was that the planning service, including plan and decision making continue as much as possible and take an innovative approach and adjustments to timescales where necessary. Further guidance was published in the form of [Coronavirus planning update](#) in May 2020.
- 3.4 In terms of plan making, Government advice is that Local Plans continue to make progress and where possible adopt new and innovative ways of operating including exploring technologies where appropriate, with [further guidance](#) provided in relation to [Statement of Community involvement](#) (SCI). The advice is that Local Planning Authorities are encouraged to undertake an immediate review where the SCI cannot be complied with due to current guidance to help combat the spread of coronavirus. This is an exercise that the authority will have to undertake. The current [SCI](#) was published in November 2019. Further legislation was published on 13 July 2020 [The Town and Country Planning \(Local Planning\) \(England\) \(Coronavirus\) \(Amendment\) Regulations 2020](#) to temporarily remove the requirement on local planning authorities to make certain documents available for inspection at premises and to provide hard copies on request. The temporary modifications are as a result of the effects of the coronavirus pandemic and will only apply until 31 December 2020. The documents will still need to be made available on the Council's website.

⁶ Chief Planning Letter

- 3.5 In terms of day to day decisions on planning applications, there has been advice on consultations procedures on planning applications and advice on holding of virtual planning committees. Determination timescales remain unchanged but extensions will be encouraged where necessary.
- 3.6 Government published [The Town and Country Planning \(General Permitted Development\) \(England\) \(Amendment\) Order 2020](#) on 24 March 2020 which allows a temporary change from existing restaurants, cafes and drinking establishments to include takeaway food until the 23rd March 2021.
- 3.7 Guidance has been published in relation to Community Infrastructure Levy and the [Community Infrastructure Levy Regulations 2020](#) laid before parliament on 30 June will come into force later in the summer.
- 3.8 Government also introduced emergency legislation The Town and Country Planning (General Permitted Development) (Coronavirus) (England) (Amendment) Order 2020 which allows “local authorities and health service bodies to carry out development, both works and change of use, of facilities required in undertaking their roles to respond to the spread of coronavirus, without a requirement to submit a planning application” for a limited time between 9 April 2020-31 December 2020.

The Business and Planning Act

- 3.9 The Business and Planning Act received Royal Assent on 22 July. This contains a series of proposed (mostly temporary) planning changes including:
 - [extending time limits on unimplemented permissions](#) that lapsed from the Covid-19 lockdown up to 31 December to be extended to 1 April 2021. Those already lapsed before the provisions come into force will be subject to an additional environmental approval, deemed approval if the LPA does not make a decision within the 28 days.
 - Measures to allow inspectors the flexibility to use more than one procedure e.g written representations, hearings and inquiries in relation to planning appeals, enabling appeals to progress faster
 - Fastracking applications for developers wanting to change planning conditions to allow [extended hours on building sites](#)
 - Measures to make it "easier for premises in England serving food and drink such as bars, restaurants and pubs to seat and serve customers outdoors through temporary changes to planning procedures and alcohol licensing”

- Planning changes will keep the system in line with the new licensing rules, with draft guidance document on the [pavement licenses](#) measures "or deemed to be granted, the applicant will also benefit from deemed planning permission to use the land for anything done pursuant to the licence while the licence is valid".

Standard method

3.10 National policy ([National Planning Policy Framework](#) NPPF) sets out that Local Planning authorities should use the standard method to determine the minimum homes needed for an area, this is set out in paragraph 60. This was first published in July 2018, with updates in February 2019.

3.11 The '[standard method](#)' formula is contained in national guidance, where it is directed that 2014-based household projections should be used:

The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.

(Paragraph: 005 Reference ID: 2a-005-20190220)

3.12 The use of 2014 household projections have been a matter of debate since the clarification was made in February 2019 in the [Government's response to the technical consultation](#). At the time, government considered that by specifying the household projections that should be used it was providing '*stability and certainty*' but committed to a 'review' of the formula in 18 months time. At the time there were up to date projections (2016 household projection) that if applied to the standard method calculation would derive a lower housing need. More recently, the Office of National Statistics (ONS) published [2018-based household projections](#) at the end of June 2020, this continued to reflect a downward trend in the number of households in the future. Government has very recently (6 August 2020) published a proposed new standardised method for assessing housing need in the '[Changes to the current planning system consultation](#)' officers will closely review and monitor how it may impact housing need in the Borough.

Further Permitted Development changes

- 3.13 Government published further regulations on permitted development on 24 June 2020. [The Town and Country Planning \(Permitted Development and Miscellaneous Amendments\) \(England\) \(Coronavirus\) Regulations 2020](#) introduces (among other things) new permitted development right to allow blocks of flats to be extended upwards by two storeys to create new homes. This is effective from 1 August 2020.

Proposed changes in Planning: Planning Paper

- 3.14 The prime minister issued a press release on 30 June titled [A new deal for Britain](#). Within the statement government committed to '*build back better, build back greener, build back faster*', with a commitment to reform the planning system.
- 3.15 Changes to be planning system were suggested before the pandemic, with the publication by the think tank 'Policy Exchange' on 'Rethinking the Planning System for the 21st Century' in January 2020 and paper by MHCLG Planning for the Future March 2020.
- 3.16 The [Planning for the Future](#) White Paper was released on 6 August outlining significant reforms. This is currently out for a 12 week consultation. Officers will closely monitor the progress of proposals and the implications it will have to the Borough's Planning Service.

Brexit

- 3.17 The UK left the EU in 31 January 2020 and is now in a transitional period before new rules come in from 1 January 2021. There is further risk from the period following Brexit which may result in another period of uncertainty and impacting upon the proposed timetable.
- 3.18 The number of changes/proposed changes outlined are substantial and yet to be fully considered, this is partly because the detail on some have yet to be published. Without knowing the full detail, it is likely that the combination of all of the above will have an impact on resources, timescales and ultimately housing delivery (amongst other things).

Housing delivery 2018-2019

3.19 The Council's [Annual Monitoring Report 2018-2019](#) sets out the number of homes delivered between the period 1 April 2018-31 March 2019. In total 165 additional dwellings were delivered in this period, a very slight increase from the previous year but still significantly short of the minimum homes needed.

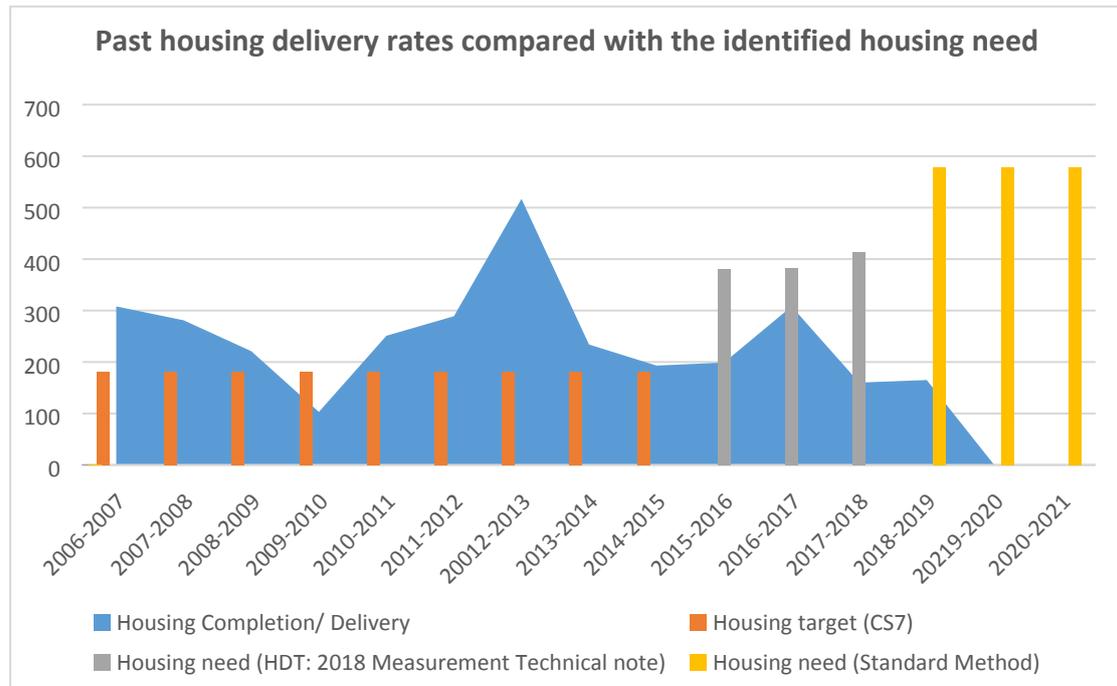


Figure 4: Chart showing housing delivery rates compared with the identified need since 2006.

- 3.20 The largest of the schemes included 30 units (gross) at Hollymoor Lane, and other modest schemes yielding between 12 and 17 dwellings including schemes at former Nescot agricultural land⁷, Cheam Road, Ashley House on Ashley Road and a scheme at Woodcote Side- the latter two were formerly in office use.
- 3.21 Looking at schemes under construction or with planning permission within the monitoring period, these comprise mainly of schemes of less than 10 units and only a few scheme being over 10 units at Chase Road and Alexandra Road.
- 3.22 The predominance of these smaller schemes may be down to a number of reasons, lack of supply of land, the demand for certain housing types, the time and complexities involved with larger schemes. Whatever the reason, in order to make a marked difference in housing delivery within the Borough, larger schemes need to be delivered.
- 3.23 Whilst not within this reporting year, a 60 bed care home at the Former Salesians⁸ site was completed in February 2020 and the Council approved 161 dwellings at Epsom and Ewell High School in December 2019. In terms of actual on site delivery, it will take some time to be reflected, this demonstrates a lag where permission is granted and actual on site delivery (if implemented at all).

⁷ The Nescot site comprised of 91 houses part 1 and 88 houses part 2, completions happened over a few years

⁸ 15/00845/FUL

4 Action Plan

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
1	Identify opportunities to align the local skills base with the need to build a significant level of housing in the Borough	<p>Align local skill base with the housing need.</p> <p>The new local plan will promote local labour agreements to secure employment and skills development as part of schemes</p>	Corporate	Long term	HDT Action Plan	<p>Further investigation needed to consider if there are any interventions that can be introduced by the Council to better align the projected growth with the required skillset e.g.construction skills.</p> <p>The Council will work with the Local Enterprise Partnership on wider research regarding skills and the labour market.</p>
2	Utilise existing 'Agents and Developer Forums' to promote opportunities in the Borough	<p>Developer Forums could identify issues affecting delivery and could open up new opportunities/ventures to provide more housing, better relationships with the development industry.</p>	<p>Corporate</p> <p>Property and Regeneration</p>	Short/Medium and Long Term	HDT Action Plan	<p>The Council will continue to attend the existing The Epsom Property Network and identify opportunities to work with local agents and developers on growth in the Borough.</p>

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
3	Investigate with the Development Management Team what practical measures/mechanism can be introduced to speed up the delivery of development schemes.	Further investigation into whether certain DM processes are delaying delivery and what actions can be taken to speed up the process.	Development Management Planning Policy	Short Term/ Medium Term	HDT Action Plan	Work in progress
4	Publish guidance on the pre-application process.	Improving pre-application processes. This will provide more certainty for applicant, through clearer guidance and early engagement with applicants, applicants are aware of the Council'	Development Management	Short/ Medium Term	Service Plan AMR HDT Action Plan 2020	Guidance published on the Council's website
5	Progress the Local Plan in accordance with newly published local plan timetable (Local Development Scheme LDS).	Progress on the Local Plan will provide greater certainty for the borough council and developers and ensures that future development is plan led.	Planning Policy	Medium/long term	AMR Service Plan Local Plan Progress HDT Action Plan 2020	Progress being made on compiling the evidence base and preparing a draft plan in line with the timetable.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
		This will include the preparation of technical assessments to ensure that the delivery is balanced and at a sustainable rate.				
6	Publish a revised local plan timetable (Local Development Scheme LDS)	The Council will be publishing a revised timetable for the preparation of the new Local Plan. This will provide greater certainty for developers regarding Local Plan timetable to enable the submission of relevant information at relevant periods and engage positively and ensure future growth is genuinely 'plan led'.	Planning Policy	Short Term	Service Plan Local Plan Progress HDT Action Plan 2020	The most up to date LDS is published on the Council's website. This is a revised timetable following the coronavirus pandemic, which resulted in slippage in the timetable. The new timetable was agreed at the 6 August 2020 Licencing and Planning Policy Meeting. Government reforms published on 6 August outline significant proposed reforms which may further impact on timescales.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
7	'Call for sites' request	The Council left the 'call for sites' open for ongoing submission of sites for future development. Any sites not submitted can still be submitted as part of the regulation 18 consultation.	Planning Policy	Short Term	Local Plan SHLAA AMR HDT Action Plan	The webpage is live.
8	Assess the potential capacity of sites within the urban area to meet the housing need.	The Council has undertaken various capacity assessments of sites within the urban area and its potential to deliver high density development to support the policy of making efficient use land.	Planning Policy	Short Term	AMR Local Plan Statement of Common Ground	The Council has undertaken urban capacity studies to review the potential capacity of sites within the urban area. These are published on the 'Evidence Base' webpage. The Council has also commissioned a Transformation Masterplan to inform what approach the Council takes to deliver more housing.
9	Commission Transformation masterplan to look at how the Borough could transform in the future to seek to meet the development need.	The Council has been proactive in investigating how the projected growth can be accommodated in the area, through the commissioning of the Transformation Masterplan. A design	Planning Policy	Short Term/ Medium Term	Progress on the Local Plan	The Council has commissioned the piece of work and it is currently being undertaken.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
		based assessment exploring how future growth can be accommodated e.g. different typologies and higher densities				
10	Work with adjoining authorities to identify a strategy to meet the housing need in the area (through continuous Duty to Cooperate).	The Council will work with its partners and neighbours to identify how the housing need can be met in the area.	Planning Policy	Short/ Medium and Long Term	Duty to Cooperate Statement Local Plan Statement of Common Ground	Progress is being made on engagement with neighbouring local authorities and relevant stakeholders in line with <i>the duty to cooperate</i> . This engagement is ongoing and will continue throughout the Local Plan preparation process and through regular officer group meetings
11	Investigate and implement a new planning monitoring system	To improve efficiency in data collection and monitoring of housing delivery, to inform central government as well as improving Local Plan monitoring process (which informs policy making process).	Planning Policy	Short/ Medium Term	Service Plan HDT Action Plan 2020	Being investigated

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
12	Publication and implementation of land use policy/guidance	The Council has published a policy statement 'Making the Efficient Use of Land- Optimising Housing Delivery 2018' (8 May 2018) in order to ensure residential housing schemes coming forward are making efficient use land.	Planning Policy Development Management	Short/ Medium Term	Implementation through Development Management process including pre-app. Monitoring through Local Plan monitoring	Published on website, applicants are signposted to this at pre-app.
13	Article 4 Directions on Employment Floorspace	The Council has a number of Article 4 Directions on some of its key employment buildings within the Town Centre. There are 16 Office Building This assists in managing the balance of housing and employment to meet future development needs.	Planning Policy Development Management	Short Term	AMR	The Council has a number of Article 4 Directions in place in the Borough. It will closely monitor the impact of the action and if further action needs to be taken
14	Identify briefings/Training for members on the Local	The briefings will ensure members are informed about the Planning system their	Planning Policy Development Management	Short Term/ Medium Term	HDT Action Plan	A training plan has been developed and implemented following the May 2019 Local Elections.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
	Plan and Housing delivery	role in decision making.				<p>Members have received training from PAS on their roles in planning decisions and the importance that their decisions are reasonable and defensible. Attention was drawn to the risks of making poor decisions- including reference to the NPPF and the presumption in favour of sustainable development, appeals, judicial review and ombudsman</p> <p>The Planning Service will continue to identify additional areas to ensure members are fully informed: Topics could include the Local Plan process, Housing delivery and Urban design.</p>
15	Update and review the Brownfield Land Register	<p>Updated annually. Suitable sites identified through this process will be included for consideration.</p> <p>Joint working between Planning and Property and Regeneration to review opportunities available from Council assets.</p>	<p>Planning Policy</p> <p>Property and Regeneration</p> <p>Housing</p>	Short Term	AMR	<p>Reviewed annually</p> <p>Data is used to inform Local Plan evidence on land supply.</p>

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
16	Update and review Self-build and Custom build Housing Register	<p>Updated annually. The register helps to inform what the need is within the borough.</p> <p>Joint working between Planning and Property and Regeneration to review whether there are opportunities available from Council assets.</p>	<p>Planning Policy</p> <p>Property and Regeneration</p> <p>Housing</p>	Short Term	<p>Plan monitoring</p> <p>AMR</p>	<p>Reviewed annually.</p> <p>Data is used to inform Local Plan evidence on need</p>
17	Review of the CIL charging schedule	The CIL charging schedule will be updated to reflect the significant growth projected to occur in the future to ensure sufficient contributions are being sought towards infrastructure.	<p>Planning Policy</p> <p>Development Management</p>	Short Term/ Medium Term	<p>CIL</p> <p>AMR</p> <p>HDT Action Plan</p>	A review of the CIL rates is being undertaken in parallel with the emerging Local Plan. A viability assessment and SHMA have been commissioned. The conclusions of these will inform the review of the CIL.
18	Update the Council's Asset Management Plan	The Council will review its own assets in order to create opportunities for future development.	Property and Regeneration	Short/ Medium and Long Term	<p>Service Plan</p> <p>HDT Action Plan</p>	<p>The Asset Management Plan is currently being updated</p> <p>The officer led Property and Regeneration Board was formed to manage the Council's land/property assets, prioritising delivery of the council's strategies and key priorities, including deliver of new housing.</p>

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
19	The creation of a Property and Regeneration Board to manage Council's assets to meet future development needs within the Borough	The Council will review its own assets in order to create opportunities and facilitate future development.	Property and Regeneration	Short/ Medium and Long Term	Service Plans HDT Action Plan	The Property and Regeneration Board comprised of senior management team, meets regularly to consider development opportunities on Council owned land.
20	Create a Housing Delivery Working Group to monitor and manage the progress being made on the housing delivery action plan	Officers from various departments to monitor the delivery of actions in the HDT Action Plan. The involvement of all departments will ensure coordinated action to deliver the HDT action plan that aligns with the various priorities of the Council.	Property and Regeneration Housing Planning Policy Development Management	Short/Medium and Long Term	HDT Action Plan	Officers will continue to monitor progress on actions to assist in increased housing delivery.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
21	<p>Identify and finalise key infrastructure requirements and priorities to support future growth.</p>	<p>Investment attracts investment. Investment toward infrastructure can unlock housing potential.</p> <p>Information on future infrastructure requirements will inform where there are funding shortfalls and where the Council should seek to obtain additional funding.</p>	<p>Property and Regeneration</p> <p>Housing</p> <p>Planning Policy</p> <p>Development Management</p> <p>Economic Development (Future 40 team)</p>	Short/Medium and Long Term	HDT Action Plan	The Council has a draft Infrastructure Development Plan that will help to identify where there are potential gaps in funding, This will be the starting point to identify where additional funding could be made available.
22	<p>Commission an assessment of the car parks within the borough to consider level of use and whether there are potential opportunities available for more efficient use of land.</p> <p>Prepare a Car Park Strategy to identify the any spare land capacity to deliver additional housing.</p>	<p>It is considered important that all car parking should be assessed to understand whether there are any opportunities available to potentially to meet some of the housing need.</p>	<p>Property and Regeneration</p> <p>Planning Policy</p>	Short Term/ Medium Term	HDT Action Plan	Being investigated

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
23	Engage with other public bodies	The Council will engage with other public bodies to explore opportunities for joint working to bring forward sites for development.	Property and Regeneration Planning Policy	Short/Medium	Local Plan HDT Action Plan	Early engagement with Surrey County Council and Utility companies, regarding their land/ property assets that may be surplus to requirements.
24	Investigate further whether CPOs (Compulsory Purchase Orders) should be considered as a measure on stalled housing sites	At present the Council has an Empty Property Strategy that identifies CPO as a potential solution.	Corporate	Long term	HDT Action Plan	Investigate further

5 Monitoring and Review

- 5.1 The Actions will be closely monitored through a number of monitoring mechanisms including the Local Plan timetable (LDS), Annual Monitoring Report (AMR), Service Plans and various working groups.
- 5.2 The relevant departments will be responsible for implementing the identified actions. An officer working group has been set up, comprising of the responsible teams/officers, who will review the progress being made on the identified actions.
- 5.3 The Housing Delivery Action Plan itself will be monitored and reviewed annually until such time that it is no longer required.

