

**Epsom & Ewell Borough Council**

**Housing Delivery Action Plan**

**April 2019**

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# 1 Introduction

- 1.1 Central Government is committed to addressing the growing housing need in the Country. In 2017, it published the [Housing White Paper “Fixing our broken housing market”](#) which identified the main reasons for the lack of the right housing in the right places as:

- 1) LPA not planning for the homes needed,
- 2) slow housebuilding,
- 3) over-reliance on small number of main players in the construction industry.

The White Paper introduced the idea of a ‘*standard methodology*’<sup>1</sup> for calculating the objectively assessed housing need (OAHN); the ‘*housing delivery test*’ that would hold local authorities accountable for their role in ensuring new homes are delivered in their area; and the measure to prepare a housing action plans to address under delivery in these areas.

- 1.2 The White Paper was followed by consultation and publication of a standard methodology for assessing housing need with the revised NPPF and associated PPG in July 2018.

## **Purpose of the document**

- 1.3 The Council is required to prepare a Housing Action Plan following the results of the [Housing Delivery Test](#) (HDT) published in 19 February 2019. It has six months to make this Action Plan.
- 1.4 The HDT measures the housing delivery from the previous three years. This is the first year of the test following the publication of the new National Planning Policy Framework (NPPF) and Planning Practice Guidance, therefore there is a transitional period whereby the housing numbers that form the basis of the test are stepped based on the methodology set out in the [Housing Delivery Test: 2018 Measurement Technical note](#)<sup>2</sup>. The results of the 2018 HDT is set out in Figure 2.

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

Figure 1:Housing Delivery Test formula

<sup>1</sup> The standard methodology is a formula to identify the minimum number of homes expected to be planned in an area. The steps are set out in the [Planning Practice Guidance](#).

<sup>2</sup> Published at the same time as the HDT 19 Feb 2019

	Number of homes required			Total number of homes required	Total Delivered 2015-2018	HDT Result 2018
	2015-2016	2016-2017	2017-2018			
<b>Epsom and Ewell</b>	381	383	413	1177	667	57%

Figure 2: Housing Delivery Test 2018 Results

- 1.9 The results of the HDT identifies that the Borough Council oversaw the delivery of 57% of housing required in the past three years. This is below the 85% threshold set footnote 39 in relation to paragraph 73 of the NPPF and the threshold of 95% of the paragraph 75 of the NPPF. Therefore the Council will be required to; identify a supply of deliverable sites including an additional 20% buffer (moved forward from later in the plan period)<sup>3</sup>; as well as prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years (respectively). This Housing Action Plan represents the latter of the two measures. Figure 3 shows diagrammatically the consequences of the Borough Council failing to demonstrate sufficient delivery.

<sup>3</sup> 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.

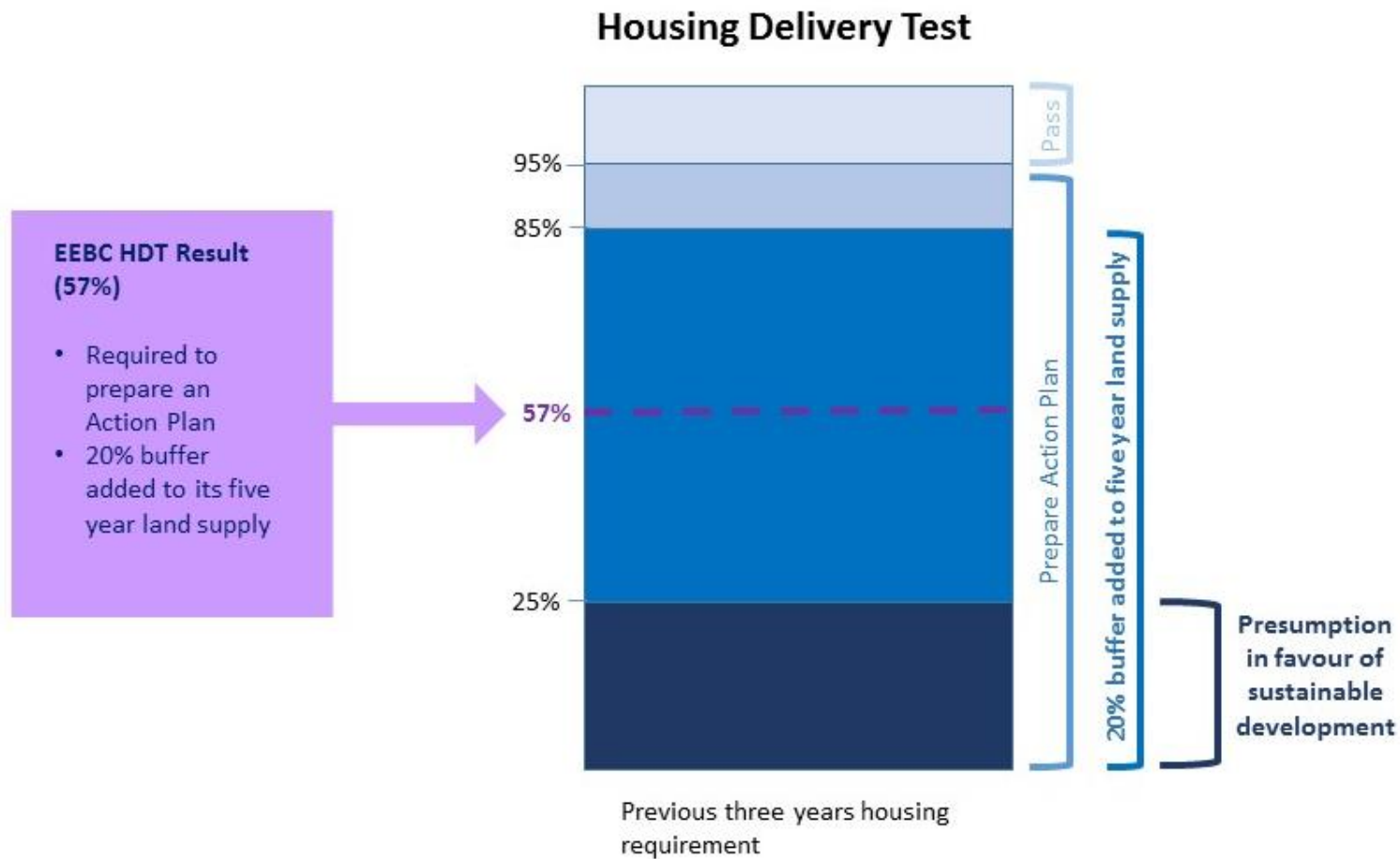


Figure 3: Diagram that outlines the level of housing EEBC has delivered in the context of the thresholds whereby the Housing Action Plan and the additional 20% buffer to housing supply is required and the 'presumption in favour of sustainable development' (the threshold whereby the presumption in favour of sustainable development will apply will increase every year until the end of the transitional period November 2021).

- 1.10 The Action Plan reviews the past housing delivery rates that have been achieved in the borough and the future challenges. It then considers what actions can be taken to increase housing delivery at a sustainable rate.
- 1.11 The Action Plan consists of six steps<sup>4</sup>:
- Step 1: Data Gathering
  - Step 2: Root Cause Analysis
  - Step 3: Action Planning
  - Step 4: Consulting and Publishing
  - Step 5: Implementing Actions
  - Step 6 Monitoring outcomes
- 1.12 Step 1 and 2 will be covered in **sections 1 and 2 of this document**, which sets the context and analyses past trends and the potential issues. These sections will provide a clear understanding of the main issues and will enable the identification of actions that can be taken to address housing delivery rates. Step 3 identifies tangible actions that the Council can consider taking. These are set out across **Section 3**. These actions will be prioritised based on what can be reasonably achieved within the short, medium and longer term timeframes and taking into account the resources available and actions that are likely to make the most significant impact.
- 1.13 The Action Plan has been prepared across departments and its success will rely on ongoing dialogue and joint working between the various departments within the Council. Step 4 and 5 are the outcomes of the Action Plan and will not form any particular Sections in this plan. However **Sections 4** outlines how the actions will be implemented and monitored. The intention is that the monitoring will be reported in the next action plan.
- 1.14 It is understood that the results of the Housing Delivery Test will be published annually by central government, it is therefore anticipated that the Housing Action Plan will be reviewed on an annual basis.

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<sup>4</sup> [Housing Delivery Test: Preparing Effective Action Plans 2019](#)

## **Epsom & Ewell Local Plan**

1.15 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

1.16 Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations requires that local plans and spatial development strategies need to be reviewed every five years and updated where necessary<sup>5</sup>. Epsom & Ewell Borough Council are 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.

1.17 The scale of OAHN has been calculated to be 579 per annum<sup>6</sup>. This is significantly higher than previously calculated need and poses a challenge in terms of delivery. The Council is seeking to respond positively to the national planning policy to deliver a sound, up to date Local Plan that facilitates the growth anticipated through the standard method.

1.18 The Council's timetable<sup>7</sup> for the preparation of the Local Plan is available on the [Council's Local Plan webpage](#). This was recently updated in June 2019 and seeks to ensure a clear spatial development strategy is published as soon as possible to ensure the projected growth is accommodated through a proper plan led approach.

1.19 The last [public consultation was a Regulation 18 consultation](#), carried out between October-November 2017. The revised Local Plan Programme identifies further consultation during Autumn 2019, in the form of an additional Regulation 18 stage. This will identify the possible spatial growth strategy, as well as site allocation options.

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<sup>5</sup> paragraph 33 of the NPPF

<sup>6</sup> The standard method produces a housing need of 579 per annum for (based on the 2014 Household projections).

<sup>7</sup> Known as Local Development Scheme LDS

### Relationship to other plans/strategies

1.20 The requirement to prepare a Housing Delivery Action Plan has come about because the Council is not able to demonstrate it has delivered a sufficient amount of housing to meet the housing need. Nevertheless, the Action Plan offers an opportunity to take positive actions that seek to meet future development needs and deliver the corporate vision “*Making Epsom and Ewell an excellent place to live and work*”.

1.21 In order to deliver the vision, the [Corporate Plan](#) sets out four priorities:

- Keeping our borough clean and green
- Supporting our community
- Managing our resources
- Supporting businesses and our local economy



Figure 4: Diagram setting out the Corporate Vision, key priorities and core values of Epsom & Ewell Borough Council



1.22 Whilst the Local Plan will form one of the key delivery mechanism for the spatial element of the Corporate vision, it does not stand alone. The delivery of the Borough's vision involves the implementation of various plans, strategies and initiatives from various parts of the Council. The Council is currently working on '[Future 40](#)', which is a new project to develop a long-term vision for the borough. Emerging findings from the Future40 consultation noted the key strengths of the Borough to include the Borough's green spaces, rich heritage- including the horse racing industry, good education offer -particularly in the creative industry and good location and connectivity. The key concerns included the lack of affordable housing, high traffic congestion and lack of coherent identity.



Figure 5: Future 40, Epsom & Ewell's long term vision

1.23 The preparation and implementation of the Housing Delivery Action Plan means working 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.

## 2 Root cause analysis

### Housing Delivery Literature Review

- 2.1 Housing need and delivery has been the subject matter of many publications in recent years. A review of the literature provides an informed context to the challenges faced by the Borough Council.
- 2.2 The literature review comprised of [Start to Finish](#) (NLP, 2016), [Independent Review of Build Out](#) (Letwin, 2018), [Beyond Location, Location, Location](#) (Savills, NHBC, 2018), [The Role of Land Pipelines in the UK Housebuilding process](#) (Chamberlain Walker, Barratt, 2017), [The Impact of Modern Methods of Construction on Skills Requirements for Housing](#) (CITB, 2018). The main findings are set out to provide a broad overview of what, on a national scale, may be the root causes of slow housing delivery.

#### **Site typologies**

- 2.3 The available studies have reviewed a range of site typologies, small (50-499 units) and large (500+ units), brownfield, greenfield, the key findings were:
- Delivery on large sites might be seen to be the resolution to housing delivery and may provide the significant quantum of units. However larger sites mean more complex issues, lengthy lead in times and build out rates, which should be factored in (NLP).
  - We cannot solely rely on small sites to deliver the housing; small and large sites are required
  - Whilst localised conditions create variations, in general, stronger local markets tend to achieve higher delivery rates (NLP)
  - Larger greenfield sites come forward more quickly than larger brownfield sites (NLP)
  - In general, sites delivering higher levels of affordable housing support higher rates of delivery- this may be down to viability, grant or subsidy available and the involvement of registered providers (NLP)
  - In general larger sites deliver more homes each year but not necessarily proportionately in comparison to smaller sites (i.e. a large site four times larger than another may not necessarily deliver four times the amount of housing in a particular period) and even the largest schemes will on average build a maximum of 161 per annum.

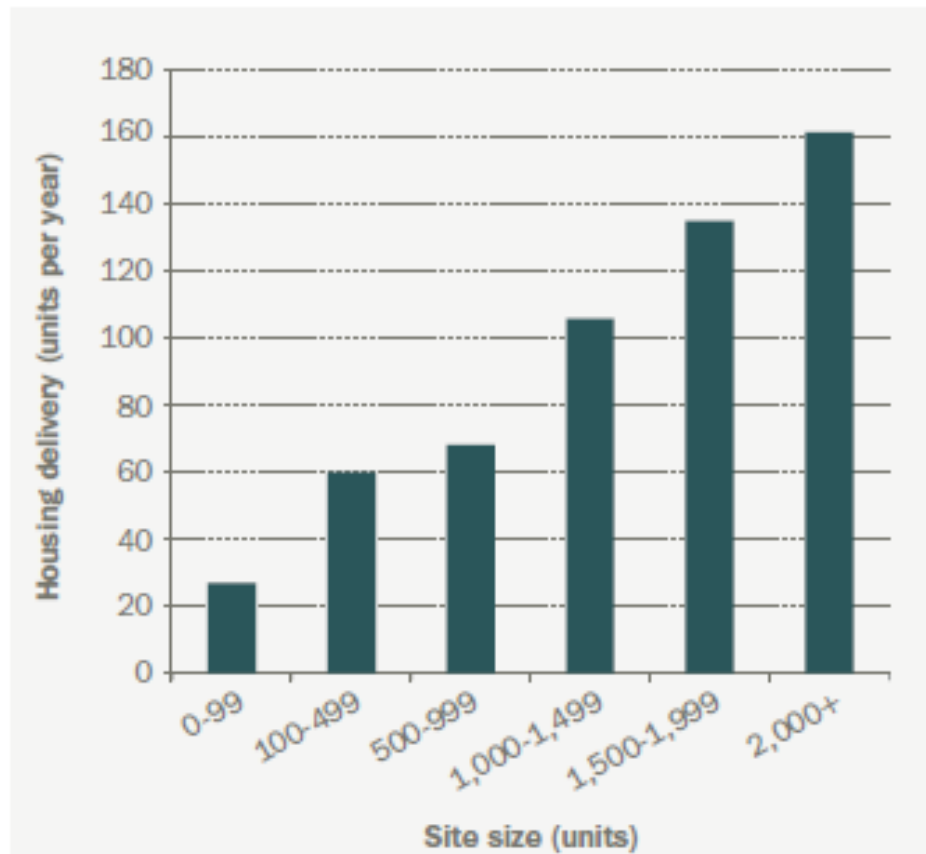


Figure 6 Average annual build rate by site size (Source: Start to Finish, NLP, 2016)

## **Housing Market**

2.4 Understanding the housing market is complex because the range of needs are so wide ranging and demographic changes is creating a more diverse market comprising of various groups (e.g. first time buyers, upsizers, downsizers) with a variety of needs and priorities. This makes it harder to predict the best response to take to address the need. Consequently:

- The traditional response to disproportionately focus on the production of family homes may no longer be an acceptable strategy
- Different groups rank different priorities for purchasing a home: the top priorities being off-street parking, new home warranty, size and design of living space, energy efficiency and a nice neighbourhood.
- The homogeneity of the types and tenure of homes on offer, limits the rate in which the market can absorb these products and ultimately slows build out rates.
- Market absorption rate will affect the speed of delivery i.e. the speed of production of homes to the rate in which they can be sold can affect profitability.

## Process

- 2.5 The process of delivering new homes, from site identification to construction, can be lengthy. The recent 'Start to Finish' study by NLP assessed over 70 large sites across the UK found that the average lead in time of 3.9 years from the identification of the site to the submission of the first planning permission. An average of 5 to 6.1 years planning approval period, and average build out rates of 161 per annum (NLP). Other studies have set out more optimistic estimates of the development pipeline with an estimate of 6.6 years from identification to on site construction (Chamberlain Walker, Barratt).

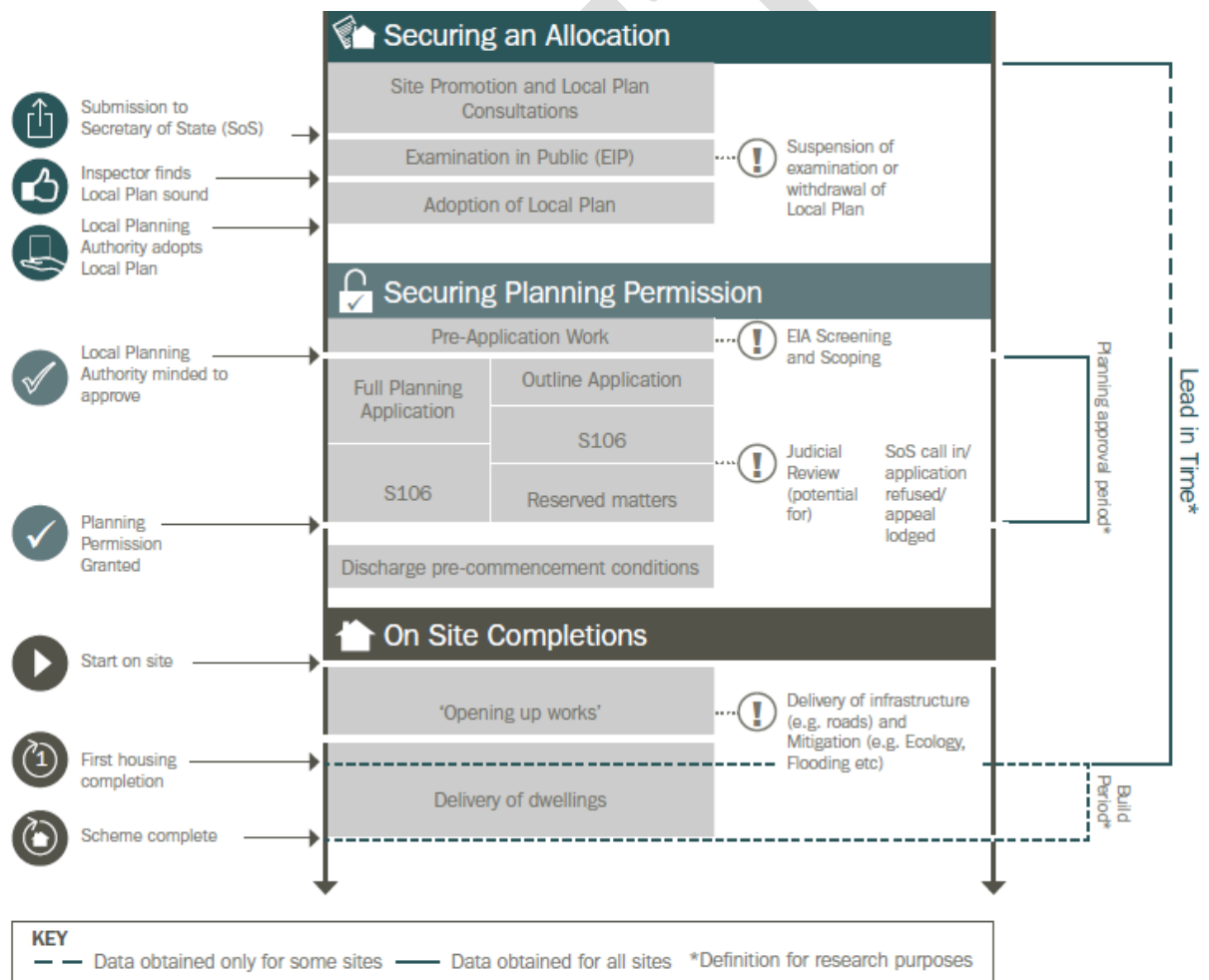


Figure 7 Timeline for the delivery of a strategic housing site (Source: Start to Finish NLP, 2016)

- 2.6 The Letwin Review recognises that existing planning rules are generally passive, reactive and are more effective in preventing things from happening. The Review also notes that they are also limited in encouraging applicants to achieve fully the outcomes the rules have been created to achieve. Consequently it recommends the introduction of new planning rules/powers on large sites (initially those more than 1500 units) that seek to deliver a wider range of housing products. The purpose of the new rules would ensure that sites of a certain size in a high demand area secure a greater absorption rate and therefore quicker delivery of new housing.
- 2.7 The recommendations include:
- The introduction of diversity requirements and the submission of diversification strategies with proposals.
  - The creation of Local Development Companies to establish masterplan and design code before 'parcelling up' the site and selling off parcels to builders/providers.
  - The creation of an expert committee to advise on matters of diversity
  - Incentivising delivery of large sites through the introduction of funding to support housebuilding on large sites to be administered by Homes England.

### **Infrastructure and Resources**

- 2.8 The impact of limited resource on housing delivery has been assessed:
- Whilst the Letwin review identified: the lack of transport infrastructure, remediation issues, delays created by utilities capital, limited available capital, limited building materials, limited availability of skilled labour as constraints to delivery, he concluded that none of these issues were likely to impede the build out rate itself- with the exception of the availability of skilled labour- particularly bricklayers.
  - A further study by CITB has assessed the workforce required to deliver Government's ambition of 300,000 homes by mid-2020 will require a 40% increase in the homebuilding workforce representing 195,000 workers (CITB, 2018).
  - The CITB study also recommended that modern methods of construction, such as off-site construction of modular buildings, can be less labour intensive and a shift towards these build types could reduce the need for certain skilled high volume workforce. However it recognised that the main challenge to moving towards these types of build types will be house builders adopting more innovative products<sup>8</sup>. The study recommended that public sector has to drive the market towards modern methods of construction, in particular through its own home building activities.

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<sup>8</sup> Four main private sector modular companies: [Caledonian](#), [Vision Modula Systems](#), [Elements Europe](#) and [Premier Modula](#). New companies coming into the market includes Swan Housing Association, Legal and General and ZEDpods.

- A significant proportion of planning permissions are unimplemented, due to various reasons including lack of resources and the fact that permissions are not held by house builders/developers

## **Housing Delivery in Epsom and Ewell**

### **The geography of Epsom and Ewell**

- 2.9 The Borough covers an area of 3407 hectares and has a population of 75,102 people<sup>9</sup>. The Borough is the smallest authority within Surrey (both in size and population), but is the most densely populated (based on persons per hectare). The existing built-up areas of Epsom and Ewell are mainly located at the northern and central parts of the Borough. The southern, eastern and western parts of the Borough are predominantly areas of open green space, comprising largely of Green Belt land.
- 2.10 The Borough's natural assets make a positive contribution to the character and nature conservation interests of Borough. These include a number of environmental designations including Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Sites of Nature Conservation Importance (SNCI) and Ancient Woodlands. In addition to this are the various open spaces and parks scattered around that make up the green infrastructure within the Borough.
- 2.11 The main watercourse is the Hogsmill River which has its source in Ewell Village and flows north west towards the Borough boundary where it meets the Bonesgate Stream before flowing into the River Thames at Kingston-upon-Thames. The other watercourses within the Borough are tributaries of the Hogsmill Stream. A relatively small proportion of the Borough as a whole is susceptible to river flooding, where Flood Zone 2, 3a and 3b largely confined to areas adjoining the river corridors. Other risks of flooding include surface and ground water flooding.
- 2.12 The Borough's heritage assets make a positive contribution to its visual character and appearance. There are 21 conservations areas, over 400 statutory listed buildings and over 100 locally listed buildings. In addition, there are 2 scheduled ancient monuments the site of Nonsuch Palace and its associated remains and St Mary's Church Tower in Ewell.

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<sup>9</sup> 2011 Census (<https://www.surreyi.gov.uk/>)



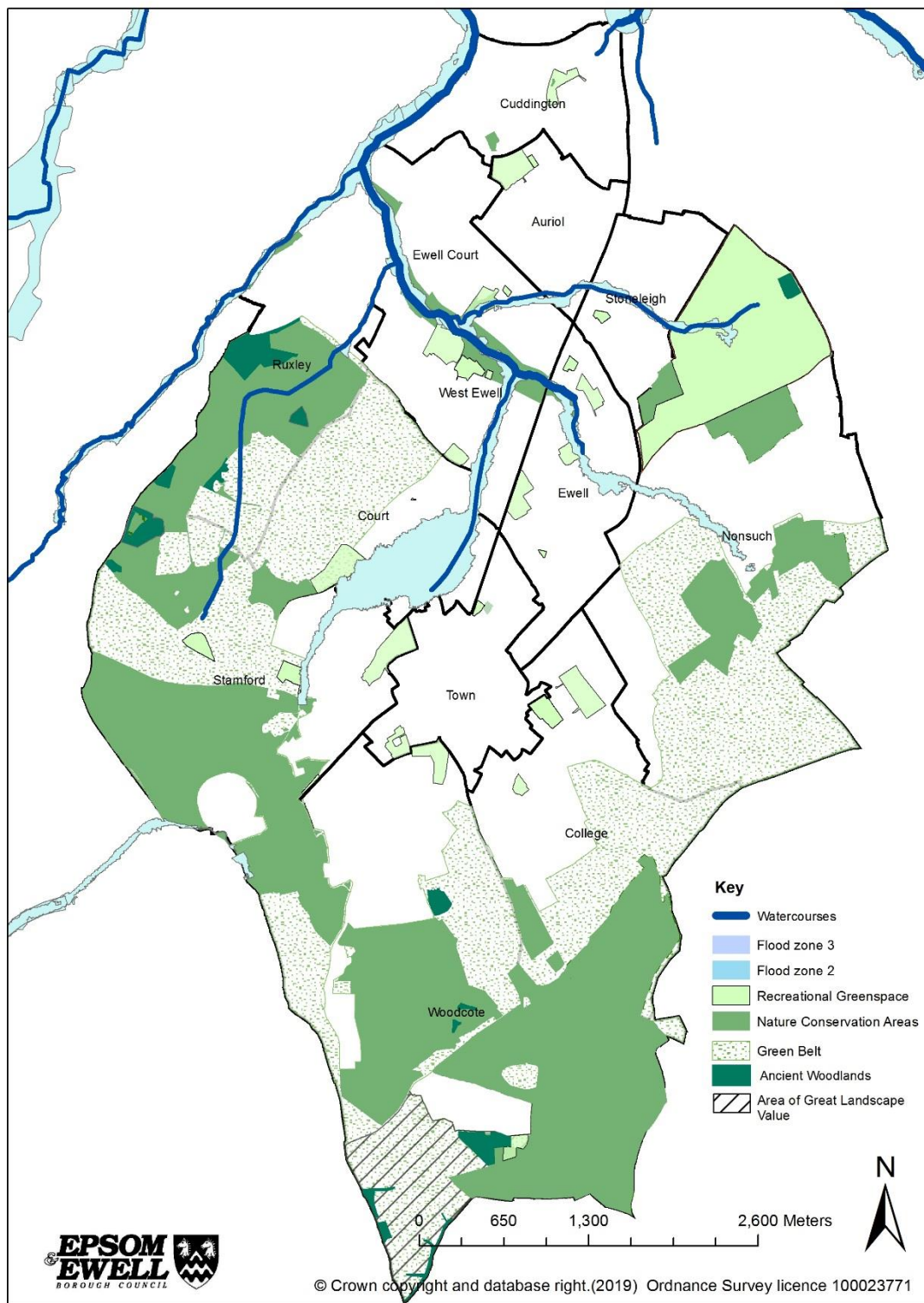


Figure 7: Map of the Borough showing the extent of environmental designations and constraints within the Borough.

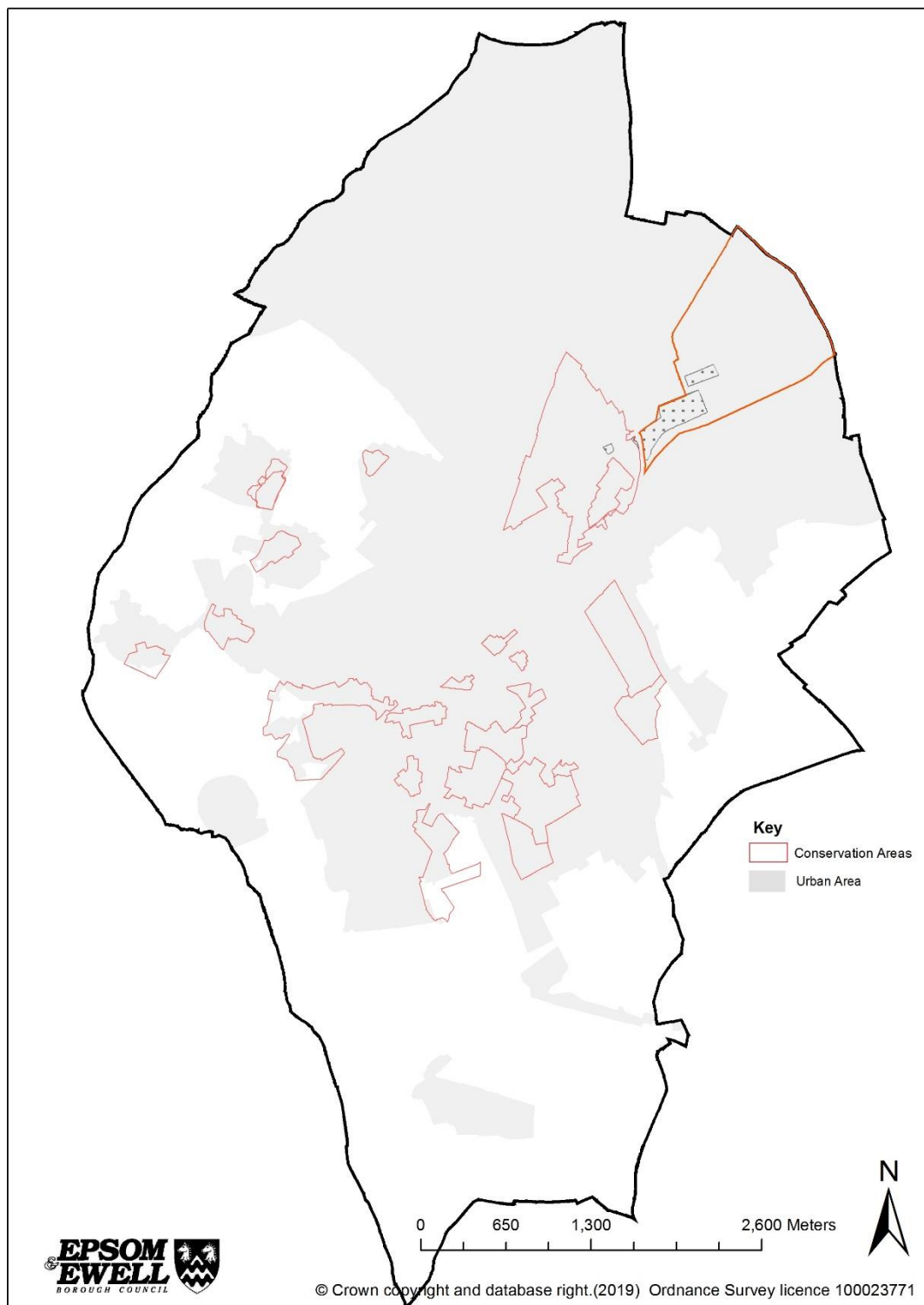


Figure 8: Map of the Borough showing the heritage designations



- 2.13 The need to balance conserving and enhancing the borough's natural environmental assets and the future development need and investment in the Borough will be a challenge. The Borough's physical constraints significantly limit land supply available to accommodate the high level of growth.
- 2.14 In addition to the wider constraints, there are sites specific constraints that can prevent or slow down either sites coming forward or the delivery of sites with planning permission. These include complex land ownership and land assembly issues, viability and planning obligations, land contamination, access issues, legal issues (e.g. restrictive covenants).
- 2.15 The Council's existing and emerging evidence base to inform the preparation of the new Local Plan includes the SHLAA, Green Belt Study (part one and part two), Traveller assessment, and a Constraints Study and two capacity studies. The outputs from these technical studies suggest that there is a limited supply of available and deliverable development land within the Borough.
- 2.16 With a limited supply, all potential development sites will need to be optimised where appropriate. This approach is in accordance with National Policy on achieving sustainable development and efficient use of land<sup>10</sup>. The Council has a limited supply of housing land within the urban area and therefore difficult decisions will have to be made to how and where housing delivery can be accommodated.
- 2.17 An overview of the borough's landscape described in this section provides a broad picture of the challenges faced by the local authority to deliver a significant amount of housing at a sustainable rate within a limited and constrained landscape.

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<sup>10</sup> NPPF 2018, See sections 2 and 11

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733637/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf)

### **Housing delivery growth trends**

- 2.18 The Borough's current housing stock consists of 31,580 (in 2014 Source DCLG tables, SHMA 2016, p40). The most recent SHMA identify the highest proportional increase in the existing housing stock, 4.88% compared with the other authorities within the Housing Market Area (HMA) between 2009 and 2014.
- 2.19 The Housing Market Area (HMA) is economically prosperous and comprises of an attractive living environment. This poses challenges because of high land values and housing costs, coupled with issues of land supply, these all have an impact on the supply and demand of housing within the area.
- 2.20 The Borough was one of the local authority areas within the Housing Market area with the highest growth in household formation, and a higher than average proportion of the ages 35-54 and children between 0-14. This suggests there is a high proportion of young families in the area which would serve to explain the high demand for family sized dwellings. The SHMA identifies the majority of the need to comprise of 2-3 bedroom units.
- 2.21 The SHMA concludes that unless something radically changes that will significantly impact on economic climate around London and the South East, the demand for housing in the area will continue to grow. The challenge this presents is how to accommodate sufficient opportunities to meet the demand sustainably and without compromising what makes the area an attractive place to live, work and visit.
- 2.22 Housing delivery in Epsom and Ewell has been on average 255 per dwellings per annum since 2006. The chart in Figure 9 compares delivery rates against the identified needs. There have peaks to delivery in 2012/2013 and 2016/2017 which can be explained by a number of completions on strategic housing sites West Park and St Ebba (known as Hospitals cluster) in 2012/13 and the redevelopment of the former Linton's Centre site between 2016/17. These are all historic site allocations in the former Local Plan. In the context of the Council's Core Strategy 2007 housing target of 181 dwellings per annum identified in CS7, housing delivery has consistently exceeded that target. However, since the adoption of the Core Strategy the scale of housing need has been recalculated<sup>11</sup> and has now been superseded by the OAHN calculated by the standard method (579 dwellings per annum, introduced by the publication of the revised NPPF).

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<sup>11</sup> The Council jointly commissioned a Strategic Housing Market Housing (SHMA) for Kingston Upon Thames and North East Surrey Authorities in 2015, the SHMA identified an objectively assessed need of 418 for Epsom & Ewell.

2.23 The revised NPPF also introduced a number of tests/measures including the Housing Delivery Test and buffers to increase housing numbers above the standard method. These are subject to a three year transitional period whereby either the need calculation or the thresholds are stepped up every year. This can be seen represented in Figure 4.

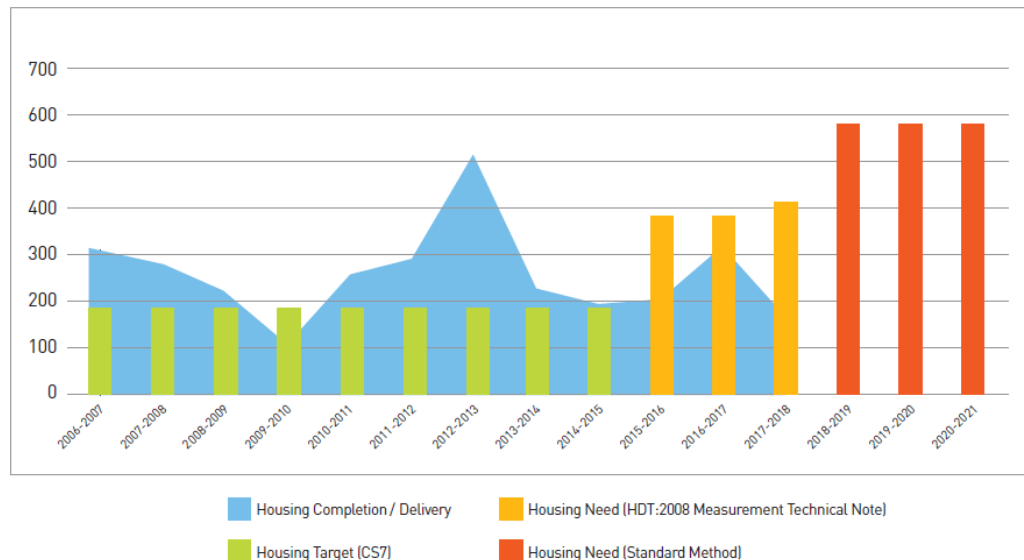


Figure 9: Chart showing housing delivery rates compared with the identified need since 2006.

2.24 The Borough Council has a limited supply of urban land. The Council evidence base including a [Strategic Housing Land Availability Assessment](#) (SHLAA) and two Urban Capacity Studies, [the Longmead and Nonsuch Industrial Estates Capacity Study](#) and the [Urban Housing Capacity Study 2018](#) demonstrate this.

2.25 The existing dwelling stock comprises mainly of detached and semi-detached houses in the Housing Market Area (HMA), with a greater proportion of homes with four or more bedrooms (SHMA, 2016).

2.26 The largest development since 2006 has been the development at West Park which was 369 dwellings and the hospital sites.

### **Root causes**

- 2.27 In order to understand the root causes and potential actions to address the main issues to housing delivery, a SWOT (Strengths, Weaknesses, Opportunity, Threats) or SCOC (Strengths, Challenges-internal, Opportunities, Challenges-external) analysis has been carried out Figure 10.
- 2.28 To supplement the SWOT analysis, Figure 11 is a PEST (Political, Economic, Social, Technology) table. The tool is normally used to assist in making business decisions by studying the environment and understanding how these factors can have an impact on decision making. The tool has therefore been adopted to inform what would be the best actions to undertake in the context of environmental factors.
- 2.29 This analysis and identification of actions involved the contribution from various officers in different departments.

<b>Housing Delivery</b>	
<b>Strengths</b> <ul style="list-style-type: none"> <li>Early interventions e.g. policy statement 'Making the efficient use of land- Optimising Housing Delivery' taken the Council to seek to increase housing delivery</li> </ul>	<b>Challenges (Internal Factors)</b> <ul style="list-style-type: none"> <li>New processes will require a period of adaptation</li> </ul>
<b>Opportunities</b> <ul style="list-style-type: none"> <li>Preparation and adopting new Local Plan that seeks to respond to the housing need to ensure development is suitable and genuinely plan led.</li> <li>Engagement with adjoining authorities to discuss ways to meet the need.</li> <li>Speed up decision making timings- planning performance agreements and pre-app service</li> <li>Clarify policy positions, statements. policy/ guidance. "optimising housing statement"</li> <li>Early and ongoing engagement with applicants/developers- e.g. Host developer forum or developer working group</li> <li>Resourcing - increase capacity through procuring external specialist for certain work areas</li> </ul>	<b>Challenges (External Factors)</b> <ul style="list-style-type: none"> <li>Resources- including limited land availability</li> <li>National Planning Policy requirements- new measures add pressure on already limited resources</li> <li>Balancing community needs beyond housing- e.g. It is important that housing needs are properly managed against employment needs. Hence Article 4 Directions operational on some of the Council's employment sites.</li> <li>Delay in the production of the local plan and a clear strategy for housing delivery risks planning decisions being subject to. "presumption in favour for sustainable development"</li> <li>Applications being called in or decisions being appealed can be disruptive</li> <li>Insufficient supply of developable brownfield land to meet the identified housing need.</li> <li>Site specific factors e.g. contamination, may slow down delivery</li> </ul>

Figure 10 Analysis of the challenges faced by the Council in trying to deliver more housing and the potential opportunities available

<p><b>Political</b></p> <ul style="list-style-type: none"> <li>• Further Planning reforms– create uncertainty and potentially increased pressures. There have been various consultations for changes to the planning system (e.g. <a href="#">Planning Reform: Supporting the High Street and increasing the delivery of new homes</a>)</li> <li>• Brexit. The process of the UK withdrawal from the EU is creating uncertainty. Potential adverse impact as a result.</li> <li>• The potential introduction of more environmental laws (e.g. <a href="#">Net Gain Consultation Proposals</a>, where the <a href="#">Spring Statement</a> confirms Governments commitment to this a mandatory biodiversity net gain in new development in is forthcoming Environmental Bill.</li> </ul>	<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Brexit. The process of the UK withdrawal from the EU is creating uncertainty in many industries including the building industry which may suffer in terms of skills and materials, which could have a significant impact on housing delivery.</li> <li>• Macro Economics pressures/factors including quantitative easing on asset prices, affordability, household formation, stamp duty are most important in generating housing output (<a href="#">Christine Whitehead, 2018</a>)</li> <li>• Striking a balance between meeting other development needs e.g. for employment alongside housing needs will be a challenge given limited land availability.</li> <li>• Dwelling prices are exceptionally high in the Housing Market Area, and therefore affordability issues is an key issue</li> </ul>
<p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Housing delivery is not one dimensional. The Council has to ensure it delivers the right types of housing in the right places. Including affordable housing, size, type and tenure. Therefore financial viability is a factor.</li> </ul>	<p><b>Technology</b></p> <ul style="list-style-type: none"> <li>• Technological infrastructure changing rapidly- The Council needs to keep up with these changes</li> </ul>

Figure 11 PEST analysis, assessment of the wider environmental factors that may have an impact on the ability of the Council to deliver more housing.

2.30 The analysis of the above information suggest that the ‘root causes’ affecting housing delivery generally fall into one or more of the following categories:

- Supply and demand- limited resources, including land supply, skills and materials
- Governance/leadership-Brexit
- Attraction- whether the Borough is attracting investment, including development and employment opportunities and the associated infrastructure.
- Process and Policy- whether there are clear processes or policies that allow for effective and efficient decisions making process, being taken may be causing confusion and therefore delaying or impeding on
- Entrepreneurship- identify commercial opportunities/initiatives/interventions to assist in housing delivery.

- 2.31 Whilst the Council will be positive and proactive about meeting the housing need, it should be noted that there is a limit to what can be achieved by the Council by itself. It is clear from the 'root cause' analysis that many of the barriers to housing delivery are outside of control of the local authority and is down myriad of reasons and people.
- 2.32 The analysis also highlights the importance of working collaboratively and positively with key stakeholders and neighbours in order to make any meaningful difference to housing delivery challenge.

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### 3 Action Plan

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
1	<b>Identify opportunities to align the local skills base with the need to build a significant level of housing in the Borough</b>	<p>Align local skill base with the housing need.</p> <p>Recent research paper on 'The Impact of Modern Methods of construction (MMC) on skills requirements for Housing' has highlighted the potential skills shortage in the construction industry to deliver a significant level of Housing.</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	<b>Utilise existing 'Agents and Developer Forums' to promote opportunities in the Borough</b>	Developer Forums could identify issues affecting delivery and could open up new opportunities/ventures to provide more housing, better relationships with the development industry.	Corporate  Property and Regeneration	Short/Medium and Long Term	HDT Action Plan	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.



Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
3	<b>Investigate with the Development Management Team what practical measures/mechanism can be introduced to speed up the delivery of development schemes.</b>	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	<b>Publish guidance on the pre-application process.</b>	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 guidance on the Council's website
5	<b>Progress the Local Plan in accordance with newly published local plan timetable (Local Development Scheme LDS).</b>	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	<b>Publish a revised local plan timetable (Local Development Scheme LDS)</b>	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	<a href="#">Up to date LDS</a> is published on the Council's website

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7	<b>'Call for sites' request</b>	<p>The Council left the 'call for sites' open for ongoing submission of sites for future development.</p> <p>In addition to this, the Planning Team undertook an internal exercise 'snap it' to further investigate sites that other departments might be aware of</p>	Planning Policy	Short Term	Local Plan  SHLAA  AMR  HDT Action Plan	<p>The <a href="#">webpage</a> is live.</p>
8	<b>Assess the potential capacity of sites within the urban area to meet the housing need.</b>	<p>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.</p>	Planning Policy	Short Term	AMR  Local Plan  Statement of Common Ground	<p>The Council has undertaken urban capacity studies to review the potential capacity of sites within the urban area. These are published on the '<a href="#">Evidence Base</a>' webpage.</p> <p>The Council has also commissioned a Transformation Masterplan to inform what approach the Council takes to deliver more housing.</p>

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
9	<b>Commission Transformation masterplan to look at how the Borough could transform in the future to seek to meet the development need.</b>	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 based assessment exploring how future growth can be accommodated e.g. different typologies and higher densities	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
10	<b>Work with adjoining authorities to identify a strategy to meet the housing need in the area (through continuous Duty to Cooperate).</b>	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

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11	<b>Investigate and implement a new planning monitoring system</b>	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
12	<b>Publication and implementation of land use policy/guidance</b>	<p>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.</p> <p>The statement clarifies to applicants the Council's position regarding optimising housing land. Applicants are therefore well advised early on the position of the council to ensure</p>	<p>Planning Policy</p> <p>Development Management</p>	Short/ Medium Term	<p>Implementation through Development Management process including pre-app.</p> <p>Monitoring through Local Plan monitoring</p>	Published on website, applicants are signposted to this at pre-app.

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
		<p>the efficient use of land.</p> <p>The effectiveness of the position statement will be measured through monitoring densities before and after the publication of the statement.</p>				
13	<b>Article 4 Directions on Employment Floorspace</b>	<p>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</p> <p>This assists in managing the balance of housing and employment to meet future development needs.</p>	<p>Planning Policy</p> <p>Development Management</p>	Short Term	AMR	<p>The Council has a number of Article 4 Directions in place in the Borough.</p> <p>It will closely monitor the impact of the action and if further action needs to be taken</p>
14	<b>Identify briefings/Training for members on the Local Plan and Housing delivery</b>	<p>The briefings will ensure members are informed about the Planning system their role in decision making.</p>	<p>Planning Policy</p> <p>Development Management</p>	Short Term/ Medium Term	HDT Action Plan	<p>A training plan has been developed and implemented following the May 2019 Local Elections.</p> <p>Members have received training from PAS on their roles in planning decisions and the</p>

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						<p>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	<b>Update and review the Brownfield Land Register</b>	<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>
16	<b>Update and review Self-build and Custom build Housing Register</b>	Updated annually. The register helps to inform what the need is within the borough.	<p>Planning Policy</p> <p>Property and Regeneration</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>

Ref	Action	Commentary	Lead/ Responsible department	Priority	Method of Monitoring Progress	Progress so far
		Joint working between Planning and Property and Regeneration to review whether there are opportunities available from Council assets.	Housing			
17	<b>Review of the CIL charging schedule</b>	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.	Planning Policy Development Management	Short Term/ Medium Term	CIL AMR HDT Action Plan	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	<b>Update the Council's Asset Management Plan</b>	The Council will review its own assets in order to create opportunities for future development.	Property and Regeneration	Short/ Medium and Long Term	Service Plan HDT Action Plan	The Asset Management Plan is currently being updated  A Property and Regeneration Board is in being formed that will seek to manage the Council's land/property assets.
19	<b>The creation of a Property and Regeneration Board to manage Council's assets to meet future development needs within the Borough</b>	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 is being formed- comprises of senior management team. To consider development opportunities on Council owned land.



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20	<b>Create a Housing Delivery Working Group to monitor and manage the progress being made on the housing delivery action plan</b>	<p>Regular meetings (held quarterly) with various departments to monitor the delivery of actions in the HDT Action Plan.</p> <p>The involvement of all departments will ensure coordinated action to deliver the HDT action plan that aligns with the various priorities of the Council.</p>	<p>Property and Regeneration</p> <p>Housing</p> <p>Planning Policy</p> <p>Development Management</p>	Short/Medium and Long Term	HDT Action Plan	<p>Officers have met to discuss and identify what actions are to be taken to assist in increased housing delivery.</p> <p>Future meetings have been set up for each quarter.</p>
21	<b>Identify and finalise key infrastructure requirements and priorities to support future growth.</b>	<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	<p>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.</p>

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22	<p><b>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.</b></p> <p><b>Prepare a Car Park Strategy to identify the any spare land capacity to deliver additional housing.</b></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.	Property and Regeneration  Planning Policy	Short Term/ Medium Term	HDT Action Plan	Being investigated
23	<b>Engage with other public bodies</b>	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	<b>Investigate further whether CPOs (Compulsory Purchase Orders) should be considered as a measure on stalled housing sites</b>	At present the Council has an Empty Property Strategy that identifies CPO as a potential solution.	Corporate	Long term	HDT Action Plan	Investigate further

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## **4 Monitoring and Review**

- 4.1 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.
- 4.2 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 meet every quarter to review the progress being made on the identified actions.
- 4.3 The Housing Delivery Action Plan itself will be monitored and reviewed annually until such time that it is no longer require.

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