Our Local Plan

# Tandridge District Council - Local Plan 2033: Housing Topic Paper

January 2019 Local Plan Submission

Tandridge District Council

| What does this document do? | What this document does not do? |
|---|---|
| Explains the Local Plan housing target and helps to set the context of this target through referencing National Planning Policy, the Local Plan evidence base, case law and the District's historical settlement pattern | Does not set the Local Plan Housing target |
| Is a supporting paper to the Local Plan | Does not influence, establish or impact upon the Local Plan Spatial Strategy or its principles |
| Describes how the housing target will be met and when it will be delivered through the inclusion of a Housing trajectory | Does not make alterations to the boundary of the Green Belt. This can only be done through the Local Plan |
| Includes detail of its strategy to deliver Affordable Housing and Gypsy and Traveller provision | Does not allocate land for development, this can only be done through the Local Plan |
| Describes the evidence base used to inform the determination of the Spatial Strategy and its housing target | |

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# Executive Summary

1. The Spatial Strategy and attendant housing target in the emerging Local Plan is a positive one. It promotes growth in order to make economic and social progress for current and future residents, whilst also recognising and responding to the District's environmental constraints and unique characteristics. It is consistent with the National Planning Policy Framework (NPPF) 2012[1], both the individual policies and when read as a whole, and promotes sustainable development and the principles of place shaping - the golden thread that underpins the entire NPPF.

2. Importantly, the strategy is also a deliverable one. The site allocations constituting this strategy and the designation of a broad location to accommodate a new Garden Community followed the NPPF's methodology for assessing potential sites. This initial sifting process was carried out in successive iterations of the District's Housing Employment Land Availability Assessment (HELAA) (2015,2016,2017/18) and included a 2017 Garden Community[2] Broad Location consultation exercise. These documents are explained in more detail in Section 2 of this Paper.

3. The HELAA in turn built upon the 2015 Strategic Housing Market Assessment (SHMA) and its 2018 update; the purpose of which was to support Tandridge as the planning authority in objectively assessing and evidencing the need for housing (both market and affordable) across its housing market area and to provide other evidence to inform local policies, plans and decision making.

4. The Local Plan preparation process was guided by these documents and its associated evidence base in order to identify which housing sites are 'deliverable' and 'developable' within the meaning of the NPPF (para 47) and thereby establish a robust housing supply target.

5. The `deliverable' definition includes sites sufficient to provide five years of housing against housing requirements whilst the `developable' definition defines sites that will come forward in the later part of the plan period.

6. The sites, including the Garden Community, which are earmarked to come forward at the later stages of the plan period are developable in that they are in a suitable location for development, there is a reasonable prospect that the sites are available and the sites can be viably developed within the timeframe established. This position is supported by evidence from the landowners, developers and/or the promoters of the sites themselves. The strategy is also supported by viability evidence and the Sustainability Appraisal, and based on this work that there is no reason to believe that any of the allocated sites will not come forward on viability grounds.

*The Housing Target*

7. The District's housing evidence in the form of the SHMA's objectively assessed need and the 2017 updated Gypsy and Traveller Accommodation

[1] Please note the Council intend to submit the Local Plan before the transitional deadline of 24 January 2019, where the NPPF 2012 will still apply.
[2] Please note the change in terminology following the Garden Village Consultation Autumn 2017

Assessment (GTAA) says that the District requires 7,960 homes[3] and 5 pitches and 21 plots for Gypsy/Travelling Showpeople[4] for the plan period up to 2033.

8. Through the Local Plan evidence gathering process over 300 sites delivering 22,550 dwellings[5] and 24 broad location sites were identified for potential Local Plan designation under the agreed NPPF methodology which considers their suitability, achievability and availability within the developable and deliverable time scales.

9. The OAN figure was then cross referenced against the sites and broad locations meeting the Local Plan's Spatial Strategy and development criteria. Through this process the final housing target figure of 6,057[6] dwellings was determined.

10. The final housing target results in an overall housing growth of 0.9% pa across the District, which is above the national average of 0.7%.[7]

11. Related to the level of housing growth is the final housing target in terms of its percentage uplift from the old Core Strategy minimum housing target of 2500 (125pa) imposed by the (now revoked) 2006-2026 South East Plan (SEP). As a contextual measure this uplift is compared against other authorities across the region.

12. In this instance, when the final Local Plan housing figure is compared against the SEP figure around 142% increase in housing delivery is generated. When the SHMA OAN figure of 9400 is applied this increases to 218%. When measured against the neighbouring authority of Reigate and Banstead the difference between the South-East Plan requirement (500 pa) and their 2012-2027 Core Strategy figure (460pa) is minus 9 %. [8] In the Mid Sussex district, the percentage increase between the SEP figure (855pa) and its 2014-2031 District Plan figure (964pa) is 13%.

13. Whilst the Local Plan positively responds to the need to increase housing supply, it is also relevant to balance this against the context of an area's characteristics. This is a central principle of the NPPF which places sustainability at its core.

14. Therefore, the final housing supply figure has been informed by the heavily constrained nature of the District and the characteristics of its settlements.

15. Most of the District is designated as Green Belt (94%) meaning that any site within the Green belt which is suitable, available and acceptable in relation to ecology and landscaping and which accords with the Council's spatial strategy has been addressed for exceptional circumstances (NPPF para 83). The criteria that the Council has used to assess sites for exceptional circumstances are set out in Section 4 of this Paper. In addition, the Council

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[3] Between 2013-2033

[4] Between 2016-2033

[5] The 300 sites do not total 22,550; 127 deliverable and developable sites total 22,550. A figure cannot be provided for the 300 sites as over 173 were not considered to be deliverable and developable and therefore no yield was identified.

[6] Please note this is a different figure to what is in the Local Plan, as the Local Plan contained rounding

[7] See Section 5 of this report for a more detailed explanation

[8] The South East Plan annual housing figure attributed has been applied because the SEP has a 20-year timeframe and the R&B Core Strategy has a 15-year timeframe

has applied various criteria that have ruled out land from consideration for meeting development needs, including Areas of Outstanding Natural Beauty (AONB), high risk flood areas and areas of Sites of Special Scientific Interest (SSSI).

16. A 5% buffer applied to the housing land supply is seen as a way of offering more choice and competition in the local housing market and is a key aspiration of the NPPF (paras 9, 47 and 50) and is a way ensuring that the Plan provides sufficient flexibility with a good prospect of the housing requirement over the Plan period being delivered. This is explained in Section 5 of this Paper.

*Distribution of New Housing*

17. The distribution of housing proposed within the Plan proactively responds to the District's environmental, social and economic profile, geography and settlement hierarchy.

18. Tandridge's residual housing target based on a Local Plan adoption date of 2019 will be met by the following:

- Site allocations,
- A Garden Community Development,
- Historic planning commitments,
- A Council led Empty Homes Programme,
- Sheltered Housing provision
- Council House Building Programme,
- Regeneration initiatives in both Oxted and Caterham,
- The yield from windfall sites based on historic delivery patterns.

19. The Local Plan translated the drivers, opportunities and constraints impacting upon meeting the SHMA OAN figure into an overarching Spatial Strategy. This in turn helped to determine both the geographical distribution and quantum of the final housing figure. This Spatial Strategy focuses housing delivery towards a strategic development that accords with the principles of a Garden Community in the long term, whilst focusing development to its urban and semi-rural service centres in the shorter to medium term[9].

20. Delivering the final housing target has meant that a proportion of this amount has had to be built on around 2% of the District's Green Belt, which will be made up of urban and semi-rural service centre edge of settlement sites and a Garden Community in South Godstone. The rationale supporting this spatial approach to housing delivery is set out in more detail in Sections 3 and 4 of this paper.

21. In terms of the release of Green Belt, the Housing Supply Paper primarily responds to this part of the Council's evidence base which establishes whether there is any land, currently designated as Green Belt that demonstrates exceptional circumstances to be released from that designation and utilised to assist in meeting development needs.

[9] Apart from on sites that are reliant on infrastructure provision within the Garden Community to offset those developments. Further information is provided in section 4.

22. The significant environmental constraints of the District are particularly relevant when assessing the justifiability of the Local Plan housing target, against the SHMA's 7,960 objectively assessed need figure. Whilst Green Belt, environmental constraints and sustainability issues inherent in a rural district are self-evident, the measures mitigating against these characteristics, for example through optimising densities, are contextualised by the existing physical fabric of the District.

23. In this instance, Tandridge's historical settlement pattern which has resulted in a polycentric pattern of development is a relevant consideration. As a central driver in determining an area's or a building's appropriate density is its immediate physical context, a polycentric rather than monocentric pattern of development can have the result of supressing higher densities. In boroughs such as Tunbridge Wells or Ashford where development is primarily clustered in one place (a monocentric character) this gives wider scope for the optimisation of densities.

24. Similarly, the potential for increasing Tandridge's density levels is further hampered by the extent of the Green Belt around its urban and semi-rural settlements. As such the extent of the Green Belt in and around these settlements precludes (in terms of justifying its release) the clustering of new development sites, which, when measured against the intrinsic Green Belt principle of preserving `openness', might be difficult to mitigate and thereby unacceptable.

25. The Local Plan's Spatial Strategy recognises the importance of providing the necessary supporting infrastructure in a way that supports development as it comes forward under the principle of seeking to utilise existing or planned infrastructure, while promoting the provision of new infrastructure elements where required. Therefore, the Local Plan's approach to delivering housing growth is targeted in a way that considers the size, nature, character and role of the settlement accommodating the site, its provision in terms of access to public transport and jobs and the level of services and facilities present.

26. The Local Plan has utilised the evidence to determine that every site has been considered and, if not allocated, discounted for a specific robust and justified reason.

27. The Local Plan's Spatial Strategy has been tested through a Sustainability Appraisal. It has been cognisant of the factors detailed above and promotes housing provision through a range of sites that delivers sustainable development across the District as a whole.

*A Strategy for Delivery*

28. The Local Plan housing target is supported by a Housing Trajectory (see Section 5 and 6 on Housing Delivery) that shows expected housing delivery rates across the Plan period. These figures have been assessed following discussion with the developers/ promoters of the sites in question and assessing the evidence on the delivery of their sites.

29. The Plan's Spatial Strategy provides the basis for a strong and consistent flow of new housing being delivered to achieve and maintain a 5-year housing land supply in accordance with paragraph 47 of the NPPF. It acknowledges that

the District's recent levels of housing completions have resulted in a shortfall when set against the new Local Plan housing target and identified through the District's Annual Monitoring Reports. Whilst many factors influencing the housing delivery rate lay outside of the Council's control, such as the recession and cuts in public spending on infrastructure, it has recognised the need to rectify the housing shortfall as quickly as is reasonably possible[10.] However, consideration has been given to meeting the shortfall over the plan period to take account of the increase in the delivery through the Garden Community, which is intended to be brought forward at the end of the plan period. A 5% buffer has been applied to the housing target to provide for choice and competition in the market. The Council can demonstrate either a 5.48 or 5.71 year supply based on the Sedgefield or Liverpool approaches respectively.

30. Whilst recognising that housing delivery in the District needs to be increased above the Core Strategy target, the Local Plan also acknowledges that simply increasing the number of new homes will not address one of the District's key priorities; which is to address the need for affordable homes.

31. In Tandridge's case the affordable housing figure is at a level (based on the PPG criteria for assessing need[11]) that it is undeliverable within the context of the overall OAN assessed figure of 398 homes a year.[12] In this instance, because the measures for assessing affordable housing and the OAN are different, (the former measurement is based on what ought to happen while the latter measures what is likely to happen)[13] it is not appropriate for the affordable housing figure to be a component of the OAN derived figure. Notwithstanding this, whilst the OAN assessment considers affordability through the assessment of market signals, this is not the same as the provision of affordable housing, and therefore the need for affordable housing is measured separately. Consequently, the need of affordable housing at 391 units is nearly the same as the annual OAN figure at 398 units, which makes the affordable housing provision identified in the SHMA unachievable.

32. As such the Local Plan recognises that the level of affordable housing provision is a matter for local policy judgement on whether and, if so, to what extent, more homes are built than either the demographic or jobs-led OAN suggests. That inevitably involves assessing the costs and benefits of a range of impacts, many of which cannot be quantified. This issue including relevant case law is discussed in more detail in Section 7.

33. In relation to housing size, the SHMA recognises that there is demand for 3 bed properties and a variety of housing products such as intermediate and market rent in the District. Meeting this demand entails delivering homes which can cater for downsizing opportunities along with homes for families and single people. There is also a recognition that a strong market desire exists to deliver rented flatted accommodation within the District's Urban and

[10] Para 3.40 Market Signals, 2015 SHMA
[11] As defined and measured in paragraphs 22-29 of the PPG,
[12] 391 affordable homes a year over the next five years and 310 a year for the remainder of the plan period
[13] PAS Technical Note, paragraphs 9.3 and 9.4.

Semi-Rural settlements, which works closely with providing choice in the wider Housing Market Area.

34. To facilitate a targeted response to meeting housing need with the District, the Local Plan has included a number of high level housing policies which are intrinsically linked to the Council's emerging Housing Strategy.[14] As a live document this Strategy is better placed to set the exact mix, tenure, size of a housing development as it can respond flexibly to the vagaries of the housing market at a given point in time and is a material consideration to decision making.

35. It is envisaged that the wide range of sites designated in the Local Plan will cater and respond to a wide range of need and thereby will support choice and competition in the market and thus provide the greatest chance that housing will be consistently delivered over the Plan period.

*Conclusion*

36. The Local Plan Spatial Strategy and attendant housing target is consistent with the 2012 NPPF. It:

- Balances the objectively assessed housing needs of the area against the built form characteristics, environmental constraints and opportunities of the District by proposing a range of housing provision including the construction of a Garden Community, by allocating sufficient land which is suitable for development (NPPF para. 17.3) and by responding to market signals,
- Takes account of the different roles and character of different areas, promotes the vitality of its main urban areas, protects the Green Belt around them, recognises the intrinsic character and beauty of the countryside and supports thriving rural communities (NPPF para. 17.5),
- Contributes to conserving the natural environment, preferring land of lesser environmental value (NPPF para. 17.7),
- Promotes mixed use developments and encourages multiple benefits from the use of land in urban and rural areas (NPPF para 17.9),
- Actively manages patterns of growth to make the fullest use of public transport, walking and cycling (NPPF para. 17.11),
- Focuses significant development in locations which are or can be made sustainable (NPPF para. 17.11),
- Seeks to improve health, social and cultural well-being (NPPF para. 17.12).

37. The outcome is a Local Plan that balances the NPPF's Sustainability, Green Belt and Placemaking principles, with the availability of land supply, the competition for land use and local priorities. It is based on a robust and comprehensive evidence base and constructed for the specific contextual circumstances that apply to the District.

38. The following sections of this Topic Paper now set out the justification for the Local Plan's Spatial Strategy for the delivery of housing in more detail.

[14] The District's Housing Strategy is scheduled for adoption in January 2019

# 1 Introduction

39. This Topic Paper focuses on the housing element of the Spatial Strategy supporting the emerging Tandridge Local Plan 2013-2033 which is at the Submission Stage. The Local Plan's Spatial Strategy which includes the distribution of housing is the most sustainable planning approach for the District and is consistent with the adopted 2012 National Planning Policy Framework (NPPF). This Topic Paper references the Plan's extensive evidence base including the 2015 and 2018 update *Strategic Housing Marketing Assessment* (SHMA) and the 2015, 2016 and 2017/*18* updated *Housing and Economic Land Availability Assessment (HELAA*).

40. Placemaking and sustainable development are embedded at the heart of the Tandridge Local Plan, one that supports a quantum of housing delivery and geography of distribution that considers the views of the existing community and the unique characteristics and needs of the District's places. The role of placemaking in planning is nationally recognised as fundamental to delivering the NPPF's agenda of creating sustainable communities. Consequently, this Topic Paper references several detailed studies that have assessed the District's built and environmental form and thereby informed the Local Plan's housing approach.

41. The Topic Paper begins with a summary of the Local Plan's Spatial Strategy with a focus on the housing elements and why it represents a sound planning approach based on local circumstances.

42. Section 2 provides the background and context to Tandridge's Local Plan housing target by a summary of its:

- Planning Profile - its historical development and the reasons for the preparation of a new Local Plan.
- SHMA - the results of its objectively assessed housing need for the District and the steps and factors which have led to this figure being derived.
- HELAA - its assessment of the quantum of land potentially available for housing designation under the NPPF assessment criteria of suitability, availability and achievability.

43. Section 3 focuses on the strategic approach to housing delivery across the District and why it is consistent with the NPPF.

44. Section 4 explains the delivery of the housing land supply over the Plan period.

45. Section 5 sets out the Local Plan's housing target.

46. Section 6 provides an explanation on the five-year land supply.

47. Section 7 sets out the Local Plan's approach to the delivery of affordable housing.

48. Section 8 of the paper outlines the approach to Gypsy and Travellers.

49. Section 9 forms the paper's conclusion.

# 2 Background and Context

50. This part of the paper considers the background and provides the context for the evolution of the Local Plan Spatial Strategy and its housing target.

*Planning Profile*

51. The Tandridge District Core Strategy 2008-2026 was adopted in 2008 and established a minimum housing target of 2,500 dwellings based on the delivery of 125 dwellings per annum. This figure was derived from the now revoked South East Plan and was determined regionally, considering the District's significant Green Belt and landscape constraints, as well as redistributed growth points within the region. Through a combination of site allocations, windfall and piecemeal development the Council has been able to meet and exceed a 5-year supply against this housing requirement for a significant number of years of the plan.

52. As such, the Core Strategy did not seek to meet the local population's housing needs and the established figure was determined regionally and reflected land capacity. It was not tested against the issues of deliverability, viability and achievability that are now enshrined within the NPPF and are fundamental requirements of plan making today. Furthermore, at that time there was no specific national or local policy requirement to maintain a rolling five-year housing land supply. This was all brought in through the NPPF, which was adopted in 2012.

53. The Core Strategy approach to development was to direct development to the main built-up areas of Caterham, Warlingham, Whyteleafe, Oxted, Hurst Green, Limpsfield, Lingfield and Smallfield – each of which are inset (excluded) from the Green Belt. Woldingham, also inset from the Green Belt, attracted minimal development due to its rural and low density nature. However, the settlement boundaries were tightly defined by the Green Belt and this has effectively served to prevent their outward expansion.

54. With the publication of the NPPF in 2012, Local Planning Authorities were required to objectively assess their housing need based on demographic change, population growth, market signals, affordability and household formation. As a result, the option to simply transfer the Core Strategy approach would fail to take account of the new and updated evidence and would not accord with the requirements of the NPPF, including the need to deliver the provision of infrastructure to meet forecast demands (paragraph 156 and 162).

55. The Council also recognised that the current strategy prevented strategically planned outward expansion resulting in development which was piecemeal in nature, unplanned and of a scale that cumulatively impacted upon infrastructure, but failed to off-set its impact as a consequence.

56. It was clear that a continuation of this approach, which was further compounded by the loss of commercial space to residential uses via the change to permitted development rights in 2013, would fail to serve the district's residents, employers and visitors. Consequently, the Council's Planning Policy Committee agreed to commence the preparation of the 2013-2033 Local Plan.

*Context*

57. This section references the SHMA and HELAA; two key evidence base documents used in the preparation of the emerging Local Plan. The former satisfies the methodology requirements of the National Planning Policy Framework (NPPF, March 2012) and Planning Practice Guidance (PPG) on Housing and Economic Development Needs Assessments (last updated February 2016).The latter follows the methodological process approved at Tandridge Council's Planning Policy Committee in March 2015 as well as the relevant sections of the NPPF and the PPG and is an analysis of the potential land supply required to address the SHMA's OAN.

*(i) Strategic Housing Market Assessment*

58. The SHMA was undertaken by consultants Turley Associates and Neil McDonald Strategic Solutions and was first published in 2015. To determine the OAN for the District the 2015 SHMA used Department of Community and Local Government's[15] (DCLG) 2012-based household projections which were released in February 2015. It also utilised the 2014 Mid-Year Estimates (2014 MYE, June 2015) and the international migration statistics for the year to March 2015, which were released in August 2015.

59. The SHMA was updated in 2018 and focused on using the most up to date data. For example, the OAN paper in 2018 considered the 2016 Sub National Population Projections published by the Office of National Statistics (rather than MHCLG) in September 2018. The 2015 SHMA supported by data in the updated 2018 SHMA concluded that:

- Tandridge is a functional component of a Housing Market Area (HMA) with Croydon, Mid Sussex and Reigate and Banstead.
- The population projection is 22% smaller over the plan period when comparing the 2012 SNPP and 2016 SNPP.
- A demographic need for 7,960 dwellings for the plan period 2013-2033 was needed, at 398 dwellings per annum. This was a decrease from the 2012 based projections (470pa).
- Need for a 20% market signals uplift due to other Local Plan Examination decisions.
- Population growth is sufficient to support expected employment projections.
- Tandridge is one of the least affordable local authority areas in Surrey with an affordability ratio of more than 14.10 times earnings and an affordable housing need of 6,605 homes over the plan period.

[15] Now known as the Ministry of Housing, Communities and Local Government (MHCLG)

- Of all households projected to form in Tandridge over the 2013-2033 plan period **79%** of households will require houses and **21%** are likely to require flats.
- Taking the report, Addressing the Needs of All Household Types, as an illustrative proxy for market housing, need is required in the following proportion for following sizes 1b 10%, 2b 26% 3b 35%, 4b 29%.[16]
- 44% of people in Tandridge earn less than the £40,000 required to access the private rental market and 75% earn less than £70,000 required to purchase entry level housing.

*The Demographic Need*

60. The OAN is based on an assumption of population growth in Tandridge. The SHMA evidence states that Tandridge's population growth has decreased 22% in the 2016 SNPP from 2012 SNPP.

61. The future development of London and the rate at which people move out of London to the rest of the UK will have a significant impact on Tandridge development as almost half of those who move to Tandridge from elsewhere in the UK come from the London area.

62. Whilst the District's birth rate is higher than the death rate, data shows that Tandridge has an ageing population. Over the Local Plan period an additional 9,825 older residents aged 65 and over are projected to live in Tandridge in 2033, relative to 2013. This represents a 59% increase in the older population, although it is notable that the number of residents aged 85 and over will see a greater proportionate increase, growing by 136%.[17]

63. The population changes when different trend periods are considered. The OAN paper explores 10 and 15-year trend periods for flows from and to the rest of the UK in the last two projections: the 2016 SNPP and 2017 Mid Year Estimate update. A 15 year trend period was modelled to understand the full effect of the recession. In addition, a projection has been produced in which both flows to and from the rest of the UK and flows to and from the rest of the world are modelled using 10-year trend periods. These are shown in table 1 below.

Table 1[18] Tandridge Proposed Population Assumption

| Different trend periods | Population change | Difference from 2016 SNPP | Percentage difference |
|---|---|---|---|
| 2016 SNPP | 11591 | - | - |
| 2016 SNHP 10YR | 12183 | 593 | 5.1% |

[16] Data taken from Table 2.2 of the 2018 SHMA Update.
[17] 2018 SHMA - Addressing the Needs of All Household Types – para 4.9
[18] 2018 SHMA – OAN - Table 3.4

| | | | |
|---|---|---|---|
| 2016 SNHP 15 YR | 11249 | -342 | -2.9% |
| S106 SNHP 10YR ALL MIG | 12255 | 664 | 5.7% |

64. The changes in the different trend periods are very small and this is mainly because of the ONS's updated assumptions for fertility, mortality and international migration and the impact of the unattributed population change. Furthermore, updating for the 2017 mid-year estimates also makes little difference. As such, the OAN paper considers the most appropriate population projections to use are the 2016 SNPP as published.

*Household Formation Rates*

65. The differences in household formation rates between 2012 and 2014 are marginal. However, the 2016 formation rates are remarkably lower. This is partly because ONS use the lower rates between 2001 to 2011, whereas for the 2012 and 2014 formation rates MHCLG used a longer trend period and made adjustments to the underlying census data.

66. Using the Household Representative Rates (HRRs) from ONS 2016 projections gives a household growth for Tandridge that is 10.9% lower over the plan period than applying the 2014 MHCLG HRRs. The stark differences come from the factors noted above and also from the distinctions in the age, sex and marital groups used in the 2012 and 2014 HRRs, compared to only the age and sex group used in the 2016 HRRs. In addition, the Household Representative Person is different; where it is defined as the oldest male and if there are no males, the oldest female.

67. For Tandridge:

- The group of males between 16 and 69 have fallen between 2001 and 2011, and continue to fall further until 2021;
- The group of males between 70 and 90+ have risen between 2001 and 2011, and continue to rise until 2021;
- The group of females between 20 and 59 rises between 2001 and 2011, and continue to rise until 2021;
- The group of females between 60 and 89 falls between 2001 and 2011, ad continue to fall until 2021

68. One way to understand the significance of falling HRRs in certain age groups is to consider a variant projection in which for all 'age only' groups the HRR is assumed, at a minimum, rise back to its 2001 level. Table 2 shows the differences between the 2016 HRRs and the 2016 'age only' HRRs.

Table 2: Household Representative Rates [19]

| Household Representative Rates | Households | Homes a year |
|---|---|---|
| 2016 | 6443 | 332 |
| 2016 'age only' | 7787 | 401 |

*Affordability and Affordable Housing Needs*

69. The SHMA 2018 provides evidence of comparable house prices above the Surrey and national averages. Indeed, in 2017 the mean house price in the District of £496,132 was more than 59% above the England average. Under the Ministry of Housing, Communities and Local Government (MHCLG) affordability indicator, lower quartile house prices were 14.07 (14.1 when rounded) times earnings in the District, whilst median house prices were 14.10 times earnings in the District.

70. The monthly cost of lower quartile private rent in 2016/2017 was £963 compared to £520 in England. CACI[20] data 2018 identifies that 44% of households earn less than the £40,000 potentially required to access private rental market and 75% earn less than £70,000 required to purchase entry level housing.

71. Notwithstanding the house price to earnings ratio detailed above, it should be noted that the affordability indicator used by MHCLG compares lower quartile earnings from jobs in the area with lower quartile house prices in the area, which is also how the PPG requires affordability to be measured. However, in an area like Tandridge this measurement is not particularly helpful, as large numbers commute to London for higher paid jobs. The SHMA points out that, had the earnings of those who live in the area been compared with house prices, the affordability of the area would not have deteriorated and, in fact, there would have been a slight improvement since 2002.

72. However, housing in the district is less affordable for people who work in the district, potentially restricting people who work in Tandridge from moving closer to their place of work.

73. Based on the findings of the SHMA, which incorporates both current and future affordable housing need, balanced against supply under the PPG methodology, there is an annual need of 391 in the first five years and 310 homes after (6,605 homes in total).

[19] 2018 SHMA, Table 4.1
[20] https://www.caci.co.uk/integrated-marketing/consumer-data

74. Notwithstanding this requirement, it may not be possible to meet this need when considering the constraints in a District. This topic is discussed in more detail in Section 6 of this paper.

*Market Signals*

75. Paragraph: 019 Reference ID: 2a-019-20140306 of the PPG provides advice on how market signals should be used to influence the OAN figure within a housing market area. This includes consideration of land and house prices, rental values, overcrowding statistics and affordability ratios between average earnings and average house prices.

76. Whilst the picture in the SHMA 2015 and its subsequent update 2018 is one of high house prices and rents which are, as in many other parts of the country, unaffordable relative to earnings, the key issue is whether the deterioration in market signals was significantly worse than in the surrounding areas, so as to indicate particular market pressures that would warrant increasing the OAN.

77. In this instance, the SHMA 2015 analysis took into account changes in house prices, rents, affordability, overcrowding and concealed families from 2001 to 2014.

78. The SHMA analysis showed that the Tandridge housing market fared comparably with the surrounding areas in all areas except affordability. The SHMA 2015 also demonstrated that increasing the quantity of housing would not make houses in this area more affordable as they started off at a high base rate. Further, the affordability indicator is DCLGs, which compares lower quartile earnings from jobs in the area with lower quartile house prices in the area and this provides a biased and simplistic understanding of the District.

79. The SHMA 2018 identifies that since 2015, there have been a number of Local Plan Examinations that have put forward this argument but have still be required to provide an affordability uplift to the OAN.

80. Table 5.1 of the SHMA 2018 compares the 2017 median workplace affordability with the uplift that has been provided at five recent Local Plan Examinations. Table 3 below sets out that this information and includes the date of the Examination.

Table 3: Comparisons of 2017 Median Workplace Affordability

| **Authority** | **Date of Inspectors Report** | **Uplift** | **2017 median workplace affordability** |
|---|---|---|---|
| Bromsgrove | 16 December 2016 | 20% | 10.24 |

| | | | |
|---|---|---|---|
| Canterbury | 15 June 2017 | 20% | 11.03 |
| Mid Sussex | 12 March 2018 | 20% | 12.69 |
| Waverley | 1 February 2018 | 25% | 14.50 |
| Camden | 10 May 2017 | 20% | 19.95 |

81. Tandridge's 2017 median workplace affordability is 14.10. Placing Tandridge in the table above based on affordability, the authority would be positioned between Mid Sussex and Waverley, where the uplift was 20% and 25% respectively. However, Tandridge would also be placed above Camden, which were afforded a 20% uplift.

82. The SHMA 2018 identifies there is no methodology to determine what uplift should be applied to an OAN. When considering the table above, it would seem appropriate that if an uplift must be applied to Tandridge's OAN based on affordability market signals, then it should be 20%.

83. Some suggestions have been made that an uplift as high as 30% should be applied. This % of uplift has not been applied elsewhere, nor would it improve the affordability in Tandridge any more than 20%, due to the relationship Tandridge has with London as set out in paragraph 71 of this report. In addition, the suggestion of 30% has been based on a number of unrealistic assumptions and the 2012 SNHP of 470dpa.

84. Further, the 2017 median workplace-based ratio of 14.10 does not take account the earnings of those who live in the District. Paragraph 5.6 of the SHMA 2018 identifies that as those who commute out of the District may earn more on average those who work in the area. Using the median earnings of those who live in the area would give a larger earnings figure and therefore result in a lower affordability. Consequently, the 2017 median residence-based ratio was 12.30.

85. Although Tandridge's affordability ratio is fairly high, it has not worsened to the same extent as others in the South East in recent years. Paragraph 5.16 of the SHMA 2018 identifies that in 2011 Tandridge's median workplace based affordability ratio was the 3rd worst in the South East; in 2017 it was the 8th worst. In the lower quartile workplace affordability ratio has been even more dramatic; in 2011 it was the 2nd worst and by 2017 it was the 13th worse.

86. The Council understand that a market signals uplift will be added at the Examination and therefore has no choice but to include an uplift. It is felt that applying a 20% market signals uplift to the demographically-based estimate of

the OAN (332 homes a year) is the most appropriate uplift, which gives a housing need of 398 homes a year 2013-33[21].

*Supporting Economic Growth*

87. 73.5% of the Tandridge population is economically active, with 68.4% either in employment or self-employed.[22] The proportion of the workforce which is self-employed (14.2%) is higher than the Surrey or countrywide average.[23]

88. Based on the 2011 Census, 8,969 people live and work in Tandridge, which represents 28.4% of all employed residents in the District. This indicates that a high proportion of residents commute out of Tandridge to work (71.6%). There is an important relationship with Greater London, with a total of 12,478 residents commuting to work in the capital[24] and a flow of around 3,500 commuters to Reigate and Banstead.

89. Experian 2017 forecasts that the number of workforce jobs in the district will increase from 38,500 in 2013 to 45,800 in 2013 and increase of 7,300 over the plan period. The OAN uses the working age population (16-64) to estimate the housing implications of the Experian forecast.

90. The 2017 Experian forecast identifies that the 16-64 population of Tandridge will increase from 51,600 in 2013 to 56,200 in 2033. Whilst the 2016 SNPP identifies that the 16-64 population will increase from 51,600 in 2013 to 54,100 in 2033. This demonstrates there will not be a large enough population of support the jobs. However, with a 20% market signal uplift, the population in 2033 will be around 57,300 - 58,200, which would be similar to the number of people needed to support the jobs. The economic growth section of this report, which starts at paragraph 196 discusses this in more detail.

*Addressing the Needs of All Household Types*

91. The analysis presented in this section of the 2018 SHMA indicates that a continuation of recent demographic trends in Tandridge would be expected to lead to the formation of additional households requiring housing of all sizes. 35% of additional households may require three bedrooms, with a further 29% requiring larger homes with four bedrooms or more. Around one in four (26%) households could be expected to require two bedrooms, with the remaining 10% of households potentially accommodated in homes with only one bedroom.

92. Delivering such a profile of housing over the plan period could require circa 79% of all new homes to be houses, with the remaining 21% flats. This conclusion is unchanged from the 2015 SHMA, despite the implementation of

[21] The exact unrounded demographic housing need estimate is 331.56. 331.56 x 1.2 = 397.892
[22] 2015 SHMA.
[23] 2015 SHMA.
[24] Defining the Housing Market Area Technical Paper – Turley Associates (2015)/Census 2011. This figure is based on all London Boroughs.

a refined methodology within this update and the integration of the latest demographic evidence.

93. The above is derived from analysis which assumes that households' existing occupancy patterns persist throughout the plan period and does not seek to estimate how market factors may influence household choices. Such choices will also inherently reflect the stock of housing currently available in the District, which is skewed towards larger properties.

94. The analysis presented in this report aligns with the suggested methodology set out in the PPG and uses the latest available data.

95. While this evidence provides a valuable overall indication of the broad mix of housing which may be required, the SHMA and the PPG recommend that policies are not overly prescriptive in directly basing requirements for individual sites on the illustrative mix presented in this section. The individual mix of housing provided on a site-by-site basis will need to respond to the changing demands and needs of the market and take account of local market evidence and viability considerations, which will have an important influence on the appropriate mix. Although the emerging Housing Strategy provides a guide to what mix should be provided on site, to ensure that the needs are being met.

*Regional Pressures and Housing Market Areas*

96. At the time of preparation of the 2015 SHMA, the latest evidence base underpinning the London Plan was set out in the 2013 London SHMA. This formed the evidence base for the current London Plan (FALP). It assumed enhanced out-migration from London from 2017 onwards as the economy recovered from recession.

97. Since that date and updated in the SHMA 2018, London prepared a new SHMA in 2017. It has also published a draft London Plan which envisages the provision of 65,000 homes a year, considerably above the 42,000 minimum figure in the FALP. This provision meets London's needs in full.

98. The Draft New London Plan is due for Examination in January 2019. Tandridge are represented through the Gatwick Diamond Group of Local Planning Authorities and are timetabled for the session on the "Wider South East and beyond" to be held on Friday 25 January 2019.

99. The SHMA 2018 and 2015 identifies that Tandridge is a functional component of a Housing Market Area (HMA) with Croydon, Reigate and Banstead and Mid Sussex. The OAN paper recognises that all these have Local Plans that are complaint with the NPPF 2012. For comparison the OAN paper considers the 2014 and 2016 SNHP figures for the Tandridge HMA, against adopted Local Plans.

Table 4: Tandridge HMA[25]

| Household Change 2018-2028 | Tandridge | Croydon | Mid Sussex | Reigate and Banstead |
|---|---|---|---|---|
| 2014 SNHP | 464 | 2485 | 720 | 827 |
| 2016 SNHP | 332 | 1412 | 627 | 542 |
| Adopted Local Plan requirements | - | 1645 | 876 | 460 |

*Government's Standard Methodology*

100. The new NPPF was published on 24 July 2018, which included the standard methodology for calculating housing need and focused on affordability as a major market signal to drive up the number of homes to be provided in the South East, including within Tandridge.

101. The calculation published in September 2017, when the Government were consulting on the standard methodology for Tandridge was 645dpa.

102. The OAN paper 2018 identifies that this figure taking account of the SNHP 2016 and the 2017 workplace based median affordability ratio would now be 465dpa, when the 40% cap above housing need is introduced. The Government published a consultation on the standard methodology to make changes indicating that the SNHP 2014 should be used, as the SNHP 2016 lowered housing projections, and as such the Government could not meet the 300,000 homes per annum they had set out to deliver.

103. The publication of the NPPF 2018 set out the 'transitional arrangements' for when the NPPF 2018 came into force for plan making. Any authority submitting their Local Plan before 24 January 2019 would be required to accord with the NPPF 2012 and the OAN calculation. As the Council intend to submit their Local Plan before the 24 January 2019, the 2016 SNHP is to be used in plan making and setting the OAN.

104. The OAN for Tandridge is 332dpa, which increases to 398dpa when a 20% uplift is added.

*(ii) Housing and Employment Land Availability Assessment (HELAA)*

*Purpose Process and Remit*

105. The preparation of a land availability assessment for housing and employment is a requirement of the NPPF.[26] The HELAA assesses potential

[25] 2018 SHMA, Table 7.1
[26] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

land and sites for their development potential focusing on their **suitability** (the physical ability of a site to be developed), **availability** (the willingness of a landowner to make a site available for development) and **achievability** (the ability of a site to be delivered).

106. The HELAA does not represent policy; nor does it determine whether a site or broad location should be allocated for development in the future or influence the determination of any planning application. Land allocations are made by local authorities through a Development Plan Document, such as a Local Plan or an Area Action Plan.

107. The sites and the broad locations assessed through the District's HELAA process, (as opposed to the final list of sites designated in the Local Plan and which constitute the final Housing target) were done in a 'policy-off' manner and were not judged in detail against the current local planning policies the way a planning application would be, although regard was made current policies to provide appropriate context. The various iterations of the HELAA have considered the development potential of the site and broad locations only[27]and were not constrained by the need for development, but instead provided part of the audit of land which informed the Local Plan. Therefore, the HELAA iterations were not constrained by an upper limit in terms of the number of sites it assessed.

108. The 2015 HELAA identified suitable sites on the edge of all settlements in order to identify possible supply set out in the Local Plan: Issues and Approach 2015. This was subsequent to the Tandridge Planning Policy Committee adopting the Local Plan's preferred Spatial Strategy in March 2017, which took account of the settlement hierarchy and sustainability appraisal. The HELAA 2018 was undertaken to identify suitable sites that were in accordance with the adopted strategy.

109. The HELAA also had to assist in the identification of a broad location within which a strategic scale development that accords with the principles of a Garden Settlement could be delivered. Further detail on this is set out in the Spatial Approaches Topic Paper 2017 that accommodated the Local Plan: Garden Village consultation.

110. These two elements of the Spatial Strategy (identification for Housing sites and a broad location) required differing methods of identification and assessment within the HELAA. Therefore the 2018 HELAA was split into two parts. Consequently, this section of the Housing Topic paper summarises the findings of each part individually.

[27] As set out in PPG

111. As the 2018 HELAA[28] supersedes and combines earlier iterations of the documents, including the Interim HELAA on Broad Locations published in 2017, the Housing Topic Paper references this document.

*Part 1 – Individual Sites*

112. The first part of the 2018 HELAA, built upon and updated the 2016 HELAA Report. It assessed the development potential of sites submitted to the Council through the HELAA process. The report presented the following key outputs:

- Details, including maps, of sites submitted as part of the HELAA process;
- An assessment of the suitability of each site for development;
- A notional development capacity that could be delivered on each site assessed to be suitable;
- A calculation of the potential windfall delivery of housing for the district;[29] and
- An indicative trajectory of development that could come forward.

113. The indicative trajectory included sites that are suitable as per the HELAA methodology, and therefore not just those which accorded with the Preferred Strategy for the Local Plan. As such, not all of the sites included in the trajectory were considered for inclusion in the Local Plan.

114. The HELAA methodology adopted by the Council in 2015 sets out a 5-stage method, based on the approach identified in the PPG. These stages are as follows:

1. Site Identification;
2. Site Assessment;
3. Windfall Assessment;
4. Assessment Review; and
5. Final Evidence Base.

115. It is not the purpose of this Paper to recount in detail the methodology, process or justification inherent with these stages. For this, further information is set out in the 2018 HELAA. With regards to the information incorporated in the HELAA around the windfall assessment, (Stage 3) this analysis has informed the Windfall section of this paper. This Section of this report primarily considers the findings of Stages 1,2,4 and 5 of the HELAA.

116. Under the first stage entitled Site Identification, the Council determined that the extent of the assessment area should be the entire District. This

[28] The 2018 HELAA has been updated in December 2018 but it is a high level document, which considers any new sites submitted following the Regulation 19 consultation in Summer 2018.
[29] Windfall delivery relates to the delivery of housing which will come forward on unidentified sites or on sites that fall below the minimum HELAA threshold within the plan period.

approach allowed the Council to consider all sites from the outset and accords with the methodology set out in the PPG.

117. Sites assessed by the 2017/2018 HELAA were identified from multiple sources, including those submitted by landowners/developers, sites included in previous iterations of the HELAA process, the Council's own land/assets as identified through any corporate review; and sites identified through the pre-application advice service or where planning permissions had lapsed or been refused, but might be granted in future. The site identification process was part of a rolling call for sites programme which began in 2015 and which considered sites entered into the process up until 30 October 2018.

*Site Assessments*

118. Information used in the assessment of the HELAA sites was gathered from a variety of 'desktop' sources, relevant information submitted by landowners/developers and site visits made by Council officers to establish whether there are any additional uses and/or constraints present on the site which had not been identified through the desktop phase.

119. For sites to move to the next stage they were assessed under the three NPPF criteria which address their **suitability, availability** and **achievability**. The elements of consideration attendant with each criterion are listed below.

*Suitability Assessment*

120. **Suitability** is a high -level assumption about whether a site could be developed, not whether a site should or will be developed or allocated.

121. When assessing the suitability of sites, consideration was given to all sites submitted and only where no feasible development potential could be demonstrated were sites deemed to be unsuitable. This may have been due to certain constraints, such as those relating to, flooding, biodiversity and ecology, and where there was no information available to demonstrate how that constraint could be mitigated or overcome.

122. Also considered were physical problems or limitations of the site or immediate surroundings. These included, but were not limited to, the following:

- Whether the site could be accessed;
- Whether topography or ground conditions would prevent development;
- Locational suitability (for example whether it was isolated from an existing settlement);
- Whether a site was a suitable size or could deliver an appropriate yield.

123. If sites had no known constraints or limitations that would prevent development, then they were viewed as being suitable. It is important to note that existing policy constraints, such as the Green Belt, were not considered to prevent the site from being assessed to be suitable as it is. Ultimately the Local Plan and the wider evidence base determine whether a site is to be allocated for development or not.

124. Finally, as part of the suitability assessment and in accordance with both the PPG and the adopted methodology, the HELAA only considered sites capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m2 of floor space) and above.

*Availability Assessment*

125. **Availability** was an important consideration in the HELAA process as it helped to establish whether a site was a valid option for consideration and relates to a landowner's willingness to see a site developed. Given the role of the HELAA in enabling the Council to establish a land supply for future development, if there was an element of doubt over whether a site would come forward or that certain constraints prevent it from being considered available (e.g. current long-term occupation or a lack of commitment from all landowners where multiple parties are involved), then it could not realistically be included as a potential option.

126. In addition, attention was given in the HELAA to the following questions in ascertaining whether the site could be judged as being available:

- Is there a willing land owner?
- Are there multiple owners/ransom strips?
- Is the site available now?
- Is the site likely to be available in 10 years' time?
- Are there any legal or ownership problems?
- What is preventing the site from being available and what measures could be taken to address this?

127. Sites which were found unavailable remained in the HELAA process but were not seen as potential options for the allocation of land or be able to contribute to potential land supply in the shorter term.

*Achievability Assessment*

128. Section 3, Paragraph 21[30] of the PPG explains that a .. *site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time."* It continues by explaining that it *"…is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period*.

[30] Reference ID 3-021-20140306

129. Assessing the **Achievability** of a site required a specialist knowledge and understanding of the market factors, cost issues and delivery of development which is key to understanding and considering the development potential of a piece of land. To secure this knowledge and support the 2015 iteration of the HELAA, the Council commissioned BNP Paribas to carry out a high level and independent assessment of site viability, using a sample of sites being considered through the HELAA process.

130. A key output of this study was to raise awareness of the elements that may be a factor in identifying viable and deliverable sites through the plan-making process and the barriers which the Council may need to consider when refining development options and drafting policies. The study represented the first stage in the assessment of site viability and reflects information gathered at that point in time.

131. As the Local Plan progressed towards its final state further site viability work was conducted throughout April and May 2018 to determine whether the Local Plan's preferred strategy could be achieved, and policies implemented. For the Garden Community, a detailed viability assessment has been carried out by GVA Grimley Ltd in December 2018.

*Estimating Site Capacity*

132. Calculating the approximate potential capacity of a site is a key aspect of the HELAA and allowed the Council to understand the development potential of the sites considered. In order to inform this assessment, it was recognised that the amount of developable land is not always the same as the area of the site submitted. Criteria for reducing the amount of developable land include proximity to AONB, Ancient Woodland, undeveloped land in Flood Zone, site topography, contamination, landscaping and infrastructure provision.

133. When considering yields, consideration was given to developable areas of sites, potential housing densities on reflection of existing character areas (identified in the Urban Capacity Study 2016) and its built form[31] and the estimates of site capacity provided by site promoters. Regard was also given to detailed work undertaken on sites that had been assessed as part of the previous iterations of the HELAA, any planning applications where applicable and planning judgement.

134. The 2018 HELAA Report therefore provides yield estimates on every site identified as being deliverable or developable.

[31] This part of the assessment was informed by the 2017 Tandridge Urban Capacity Study and the Tandridge 2016 Landscape Capacity and Sensitivity Study.

*Site Categorisation*

135. The determination of a site's suitability, availability and achievability combined with timeframe for development, directly informs the overall site assessment as either:

- **Deliverable,**
- **Developable,** or
- **Non-developable**[32]

136. For the purposes of the HELAA sites that have been assessed to be suitable, available and achievable and located outside of the Green Belt have been classified as **deliverable,** unless the Council had specific information to suggest that the site could not come forward within 5 years. This was because the existing development plan would generally support development at such locations.

137. For the purposes of the HELAA, sites were classified as being **developable** if they were either:

- Suitable, available and achievable sites that are located within a defined settlement boundary, but specific information suggests that development could not come forward within 5 years; or
- Suitable, available and achievable sites that are located within the Green Belt.

138. The reason for classifying sites located within the Green Belt boundary as **developable** was due to the fact that the HELAA assumed that such sites will, where justified, come forward through the plan-led system as allocations. Given that the Local Plan is not envisaged to come into effect until 2019/20 and that achieving planning permission and developing sites could take varying amounts of time, the HELAA assumed that completions on such sites would not be until the 2024/25 monitoring year at the earliest. Accordingly, such sites would not have completions within 5 years and thus can only be classified as developable[33].

*Non-Developable*

139. A site was considered to be non-developable where the prospect of development is unlikely as it does not meet all three criteria of being suitable, available and achievable. As such, there are multiple reasons as to why a site would be considered non-developable. Lists of non-developable sites categorised as unavailable or unsuitable can be found in Appendix 4 of the 2018 HELAA.

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[32] These definitions are NPPF explained in footnote 11 to Paragraph 47 of the NPPF.

[33] It should be noted that the HELAA takes a high level approach but the Local Plan and the housing trajectory is guided by additional delivery information.

*Findings*

140. This section of the report summarises the main findings of the Housing and Economic Land Availability Assessment (HELAA). These findings informed the Local Plan's final housing target.

*Potential Housing Sites*

141. **15 sites** were considered to be **deliverable**, meaning that they could come forward in the next 5 years. Collectively these sites are estimated to be able to deliver **463 dwellings**.

142. **112 sites** were considered to be **developable,** meaning that they could come forward in 5 or more years' time, between 2024/25 and 2033 and beyond. Collectively, these sites were estimated to be able to deliver **22,087 dwellings.** This figure excludes estimated windfall figures and only includes individual sites identified in the HELAA. As with the deliverable sites, maps and site assessment information for sites considered to be developable can be found in Appendix 3 of the 2018 HELAA.

*Potential Gypsies, Travellers and Travelling Showpeople Sites*

143. The HELAA identified Traveller sites following a call for sites and an assessment of existing Traveller sites, including unauthorised sites and sites with temporary permission. The HELAA's approach to Traveller sites differs in a couple of respects to that of housing sites (bricks and mortar) in that where sites are not connected to an existing sustainable settlement they are still considered, as it is acknowledged that existing Traveller sites are often in relatively remote locations. Furthermore, if they are sited in an area designated as AONB it has been concluded that his does not automatically restrict development of sites for Traveller uses.

144. **4 sites** through the HELAA process were considered suitable for Traveller accommodation. Collectively, such sites could deliver up to **35 pitches**.

145. **9 sites** were identified as having issues that would need to be overcome before they could be considered suitable for Traveller accommodation. Collectively, it is thought that such sites could deliver up to **41 pitches** should the issues be overcome. For detail on how the Gypsy and Traveller Accommodation Assessment (GTAA) figure was derived and the site designation process see Section 8 of this Paper - Gypsy and Traveller Accommodation.

*Indicative Housing Trajectory*

146. Using the information collected on sites assessed as being deliverable and developable for housing, the Council has produced a notional housing trajectory (table 5) for the period 2019-2033+. For the purposes of the trajectory only, the Council has assumed that all sites assessed as being deliverable would come forward between 2019 and 2024 and all developable sites would come forward from 2024 – 2033+. It should be noted that this is only an indicative trajectory based on HELAA sites and

considers very minimal evidence to inform it and therefore is entirely different to the trajectory applicable to the Local Plan.

Table 5: Notional Housing Trajectory

| | 2019 2024 | 2024 2029 | 2029 2033+ |
|---|---|---|---|
| **Deliverable Sites** | | | |
| **Developable Sites** | | 8462 | 13625 |
| **Windfall** | 145 | 145 | 145 |
| **Cumulative(5yr)** | 608 | 8607 | 13,770 |
| **Cumulative (total)** | | 22,985 | |

*Part 2 Broad Locations*

147. Part 2 of the 2018 HELAA document, considered larger areas of land known as broad locations which could be used to accommodate the new Garden Community development in the longer term. It expanded upon the adopted 2015 HELAA methodology and set out how locations for consideration were identified and the criteria for their assessment. Ultimately it made a judgement about their **suitability and availability.** The HELAA methodology used to assess the broad locations differs from the one used to assess the individual housing sites.

148. The areas considered as broad locations could have been a number of individual HELAA site submissions clustered together, one single site submission, or may contain sites that have not been submitted but which have been identified by other means i.e. consultation, or Council evidence gathering.

149. The broad locations considered in the HELAA document were predominantly in areas within the administrative areas of Tandridge District. However, where locations were identified through the process which crossed local authority boundaries (i.e. land areas as submitted), these were considered, as far as is practicably possible. They were also considered by the other relevant authorities who carried out their own assessments, in accordance with their own process.

150. Part 2 of the 2018 HELAA presented the following key outputs:

- Details, including maps, of locations being considered;
- An assessment of the suitability of each broad location;
- I key constraints identified that would need to be overcome, and which could present an obstacle to development;
- A point in time assessment of availability of the land considered within the broad location being assessed; and
- A notional development capacity that could be delivered at each location.

151. Similar to the site section, it is not the purpose of this paper to give a detailed report of this process, but rather it gives a synopsis of the

assessment methodology and process and details the 3 broad locations considered for designation within the Local Plan as part of the Garden Village Consultation in 2017.

152. The information used in the assessment of the broad locations was gathered from a variety of 'desktop' sources, site visits and developer/promoter meetings. The broad location assessments were also informed by a district wide SWOT analysis which was undertaken to explorer reasonable alternative ways to meet development needs. The Spatial Approaches Topic paper 2017 provides further information on the methodology used to identify potential broad locations.

153. For the purposes of identifying and considering broad locations the Council has looked at:

- Clustered HELAA sites that, when considered together, could deliver large scale development (see section on minimum parameters); and
- Significantly sized sites/site parcels, submitted for consideration in the context as a self-sustaining settlement.

154. Through this process, ten locations were subject to further consideration namely:

- South Godstone
- Blindley Heath
- Horne
- Lambs Business Park
- Lingfield
- North of Copthorne
- Hobbs Industrial Estate
- Chaldon – Land at Alderstead and Tollsworth Farm
- Land West of Edenbridge
- Redhill Aerodrome

155. The Chaldon, Edenbridge and Redhill Aerodrome locations included large areas of land which straddle Tandridge and neighbouring authority areas.

*Assessing the Suitability of a Broad Location*

156. Suitability is a high-level judgement about whether development could take place, not whether it should, or will. The assessment of suitability is one, albeit crucial, aspect of the HELAA and determining suitability is done by taking into account information available to the Council to help build up a picture and general understanding of the location and its development potential. The following test criteria were applied to the broad location assessment:

- Test 1 - Locational Suitability
- Test 2 - Minimum Parameters (At least 2,000 units at 30 dwellings per hectare and 2.5ha of employment land)

- Test 3 - Wider landscape impact

157. As with the site assessments, existing policy constraints including Green Belt were not applied to the suitability assessment as, along with infrastructure considerations, as they are a matter for the wider Local Plan process. The detailed definition of each test and the reasoning for their application can be found in the HELAA.

*Assessing the Availability of a Broad Location*

158. The definition of Availability is the same as the one used for assessing the individual sites. However the questions asked were slightly different. These were:

- Are there any available sites within the broad locations?
- Are the landowners willing to see their land developed?
- Are there multiple owners/ransom strips?
- What legal agreements and options are in place, or in progress?
- Is the site likely to be available at a point in the future? If so, when?
- Are there any legal or ownership problems?
- What is preventing any sites from being available and what measures could be taken to address this?
- Are there any significant constraints or requirements of the development that need to be overcome before development can take place? If so, how long will it be before the land is available for development?

159. In terms of Tandridge's potential broad locations which will come forward in the latter part of a plan period, covenants could be resolved before its assumed delivery period, land vacated by tenants and legal agreements signed. The role of broad locations in the planning process therefore has been to ensure there is sufficient land for the latter part of the plan period. Therefore, the assessment must take a pragmatic view in determining availability.

160. Where a location straddled the boundary, the availability assessment reflected upon any known position taken by a neighbouring authority in their land availability assessments and planning strategies. Availability obviously had an effect on the Council's ability to consider the development potential and deliverability of a location. Therefore, a broad location may not be considered available for development through the HELAA process where the Council, has been formally advised by a neighbouring authority that a location is not reflective of that authority's plans.

161. In carrying out this HELAA, the Council has considered the most up to date position of its neighbours and used planning judgement to determine what effect, if any, this has on considering a location available for development.

*Assessing the Achievability of a Broad Location*

162. The planning and development industry accepts that economies of scale are more likely to be achieved, and land value capture opportunities realised, in larger scale greenfield developments; where there is likely to be a low existing use value. This can assist in delivery of essential infrastructure. In these circumstances the larger a development, the more likely it is to be financial viable. Land capture and profit margins are more readily secured by promoters and developers on such large-scale developments and the available funding for infrastructure and services are a significant opportunity and benefit to such developments. However, achievability will need to consider any significant infrastructure that may be needed or other constraints that could have an effect on the viability.

163. The broad location element of the HELAA did not look at detailed proposals for development, but within which the principle of development could be established. The achievability of each location was assumed to exist due to the scale of development that could take place, as ultimately this is a matter for the wider Local Plan to explore and assess in detail. This has included viability testing informed by the scale of development and information about the level of infrastructure provision that will be needed to support the development.

*Broad Location Site Capacity*

164. Calculating the approximate potential capacity of a site was a key aspect of the HELAA process as it allowed the Council to understand the development potential of each site and location. However, by its very nature development capacity can only be indicative pending the gathering of further information gained through detailed development proposals and in the case of broad locations; through master planning. For the sake of the HELAA, land promoter information has informed the understanding of a site's capacity and the amount of developable land and is only altered where the Council has disputed that information.

165. Where a location straddles the District boundary, the cumulative figure for the entire site is used, as it is considered more representative of what each site could deliver.

*Suitable and Available Broad Locations*

166. For information on how the broad locations were identified, please refer to the Spatial Approaches Paper: Garden Villages 2017. However, focusing on the HELAA and under the criteria listed above, the broad locations and the reasons why they were deemed Unsuitable and Unavailable at the HELAA stage are listed in Appendix 4. The following three broad locations were considered by the 2018 HELAA to be appropriate for further consideration under the Local Plan designation process.

- Redhill Aerodrome
- South Godstone

- Blindley Heath

167. Proformas included within the HELAA set out: geographical information, how each meets the suitability tests, highlights on additional and relevant information relating to constraints and comments upon availability and potential timescales for delivery (using information drawn from material provided by land promoters, the Council's evidence and professional judgement).

*Post 2018 HELAA Broad Location Work*

168. In order to determine the preferred location for the Garden Community[34] in the Local Plan, the Council has gathered a wide evidence base, including sustainability, transport modelling and deliverability. Using the most recent evidence at the time, a matrix was prepared for Planning Policy Committee in March 2018 on which Garden Community had the least obstacles. An updated matrix is provided in Appendix 1, although it should be noted that the matrix is only ever a summary of the full evidence.

169. The Council also considered whether two Garden Communities would be possible. However, this has been discounted based on the impact on the A22 arising from the combined delivery of Blindley Heath and South Godstone, and the deliverability of Redhill Aerodrome within the plan period. Further, discussions with developers and work through master planning will be a fundamental factor in the Area Action Plan for the South Godstone Garden Community. As a result, this information will be fed back into subsequent HELAA reviews.

170. The viability of the Local Plan has been assessed and reported upon through the Regulation 19 stage and then subsequently updated in the work undertaken by GVA Grimley in December 2018. This work has played a key role in demonstrating that the Local Plan can be achieved.

[34] Please note the Garden Village was amended to Garden Community to reflect the comments made in the Local Plan: Garden Villages Consultation. See Statement of Consultation on the Garden Village Consultation for more information.

# 3 Understanding the Spatial Strategy

*Background*

171. A strategic understanding of the district's historical profile, the different characteristics and roles of its areas, along with its physical, social and environmental elements and the availability of land supply has been an intrinsic element of developing the Local Plan's Spatial Strategy. This section of the topic paper sets out the main considerations that influenced the development of the Spatial Strategy, although more detail is set out in the Preferred Strategy Topic Paper 2017.

172. Through the new Local Plan preparation process precipitated by the NPPF policy changes noted in Section 1, the Council undertook three Local Plan consultations under the Regulation 18 stage in order to gain a range of views on the emerging plan. Following these consultations and after considering the Local Plan's evidence base, together with development needs and requirements and the emerging Local Plan Vision and Objectives, a preferred Local Plan Spatial Strategy was approved by the Planning Policy Committee in March 2017. [35]

173. As a result, it was determined that the Spatial Strategy would be guided by these overarching principles:

- An infrastructure-led approach that ensures new development is capable of delivering infrastructure improvement to meet the needs of the existing and future population throughout the plan period;
- The allocation of a strategic site at the latter end of the plan period capable of delivering development based on garden village principles, including a primary school and which facilitates the delivery of secondary school provision, primary health care facilities, highways improvements and employment space commensurate with the scale of housing;
- The utilisation of previously developed land at densities appropriate to the character of the existing area and by utilising higher densities in close proximity to public transport;
- The delivery of sustainable development through allocated sites on the edge of Tier 1 and 2 settlements and in locations supported by Neighbourhood Plans, by adjusting the Green Belt boundary where none of the purposes which define Green Belt are served and where exceptional circumstances are considered by the Council to exist;
- Supporting economic growth through intensification and/or expansion of existing employment sites, where appropriate; and by allocating additional employment land in sustainable locations to support the local and rural economy.

[35] This approach and the alternative options explored by the Council can be found in the March 2017 Our Local Plan, Preferred Strategy Paper

174. Guided by these principles it is considered that the Local Plan's preferred Spatial Strategy is consistent with the promotion of sustainable development in the NPPF. It inherently takes account of the roles and character of different areas and recognises the intrinsic character and beauty of the countryside and supports thriving rural communities (NPPF para. 17.2) whilst actively managing patterns of growth to make the fullest use of public transport, walking and cycling (para. 17.11).

175. Whilst developing sites within the boundaries of its existing Urban and Semi-Rural settlements the Spatial Strategy responds to the limited development opportunities within these settlements by developing sites, including a broad location for the accommodation of a Garden Community Development, within the Green Belt where justified. This approach required that the Council justify the release of 2% of its Green Belt through the NPPF's Exceptional Circumstances (detailed in a separate section of this paper).

*Environmental Characteristics*

176. The District is 94% Green Belt, the highest level in the country and its environment is diverse (see Map 1 below). The majority of the area can be described as countryside, made up of small agricultural fields, woodlands (including 250 Ancient Woodlands), connected hedgerows, wetlands, ponds and rivers. This wide range of green infrastructure includes two zones of influence, the European Protected Habitats (Ashdown Forest and the Mole Gap to Reigate Escarpment).

177. A significant proportion of the countryside falls within two Areas of Outstanding Natural Beauty (AONB); the Surrey Hills AONB in the north and the High Weald AONB in the south-east.

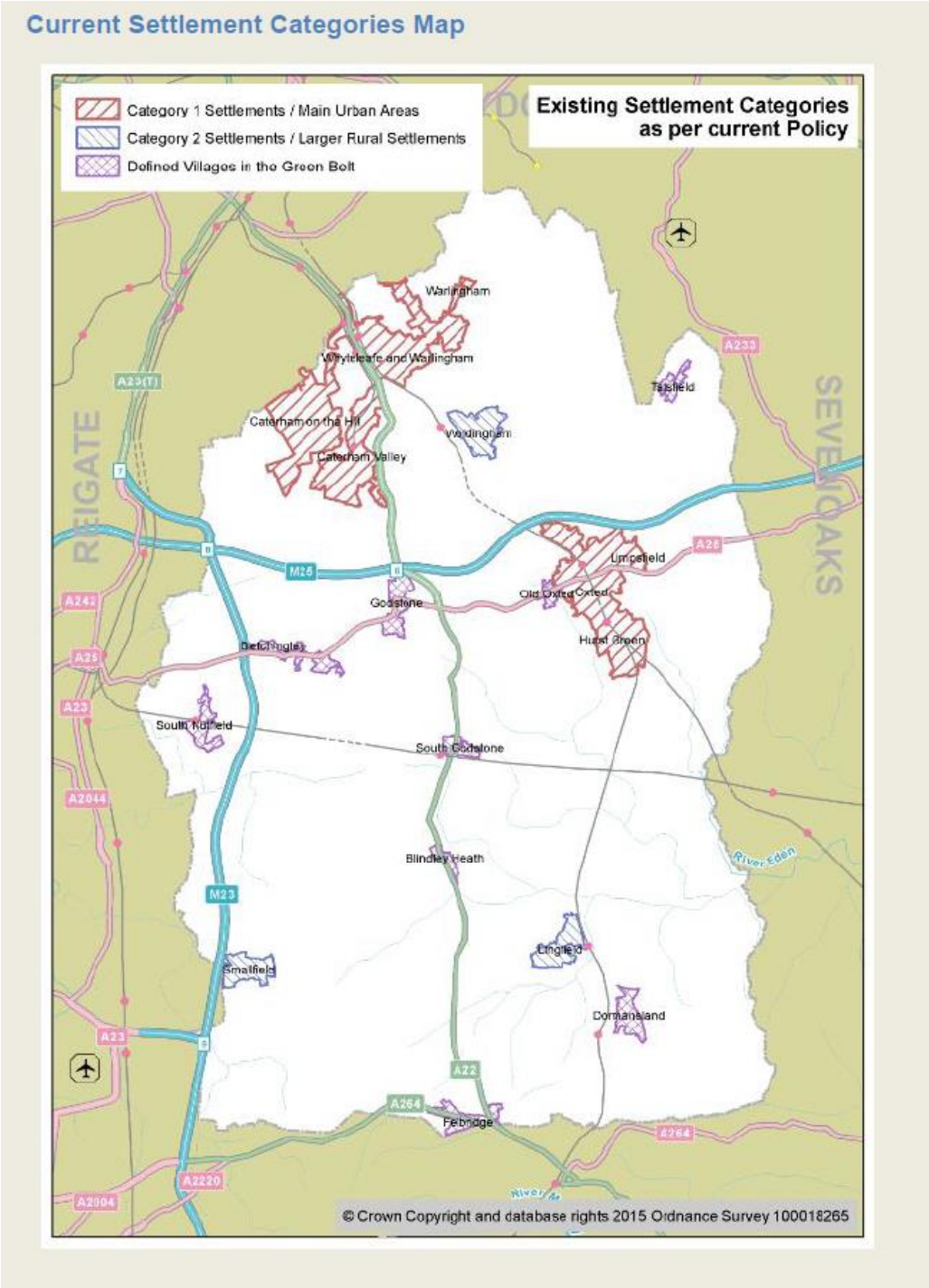
178. The AONB in the north of the district contains in part key settlements, with the potential for the AONB Candidate Areas to further restrict land availability and supply adjacent to sustainable settlements. There are also over 250 Sites of Nature Conservation (SNCI).

179. The countryside is interspersed with a range of attractive and historic settlements which contribute to the District's diverse and rich heritage. There are 19 conservation areas, and over 70 Grade 1 and Grade II* listed buildings in the District. Many areas within the District's rural settlements contain highly attractive townscapes that have been in place for centuries and which make a major contribution to the character of the District.

180. Many of the District's rural settlements are located away from the primary road network and rely on narrow rural lanes for access and movement.

181. The District includes areas of flooding with Flood Zones 3a and 3b. It has been vulnerable to flooding, both in the north of the district and across large areas in the south of the district.

## Map 1: Core Strategy Settlement Hierarchy




*The Settlement Hierarchy*

182. DCLG figures[36] on Tandridge's dwelling stock showed that as of April 1st 2016 it contained 35,780 dwellings. In 2018 this number totalled 37,060 dwellings when 1,280 completions were taken into account at the end of the 2017/2018 monitoring period. These households are predominantly located in the north of the District.

[36] DCLG: Table 100 Dwelling Stock: Number of Dwellings by Tenure and District: England 2016

183. There are two main built up areas in the District: the Caterham cluster in the north, which includes Warlingham and Whyteleafe and the Oxted cluster just south of the M25, which includes Hurst Green and Limpsfield.

184. There are seven Urban (Tier 1) settlements. These are Caterham Valley, Caterham on the Hill, Hurst Green, Limpsfield, Oxted, Warlingham and Whyteleafe. In total they contain 20,000 households around 55% of the District total.

185. Below the Tier 1 settlements there is a range medium-sized Semi Rural settlements (Tier 2). These settlements are Godstone, Lingfield and Smallfield. They contain 3800 households around 10% of the District total.

186. Below this are the small rural settlements (Tier 3) of Bletchingley, Blindley Heath, Dormansland, Felbridge, Old Oxted, South Godstone, South Nutfield, Tatsfield and Woldingham. These settlements contain 4,900 households, around 13% of the district total.

187. The rest of the District's households are located in the as Limited and Unserviced settlements (Tier 4).

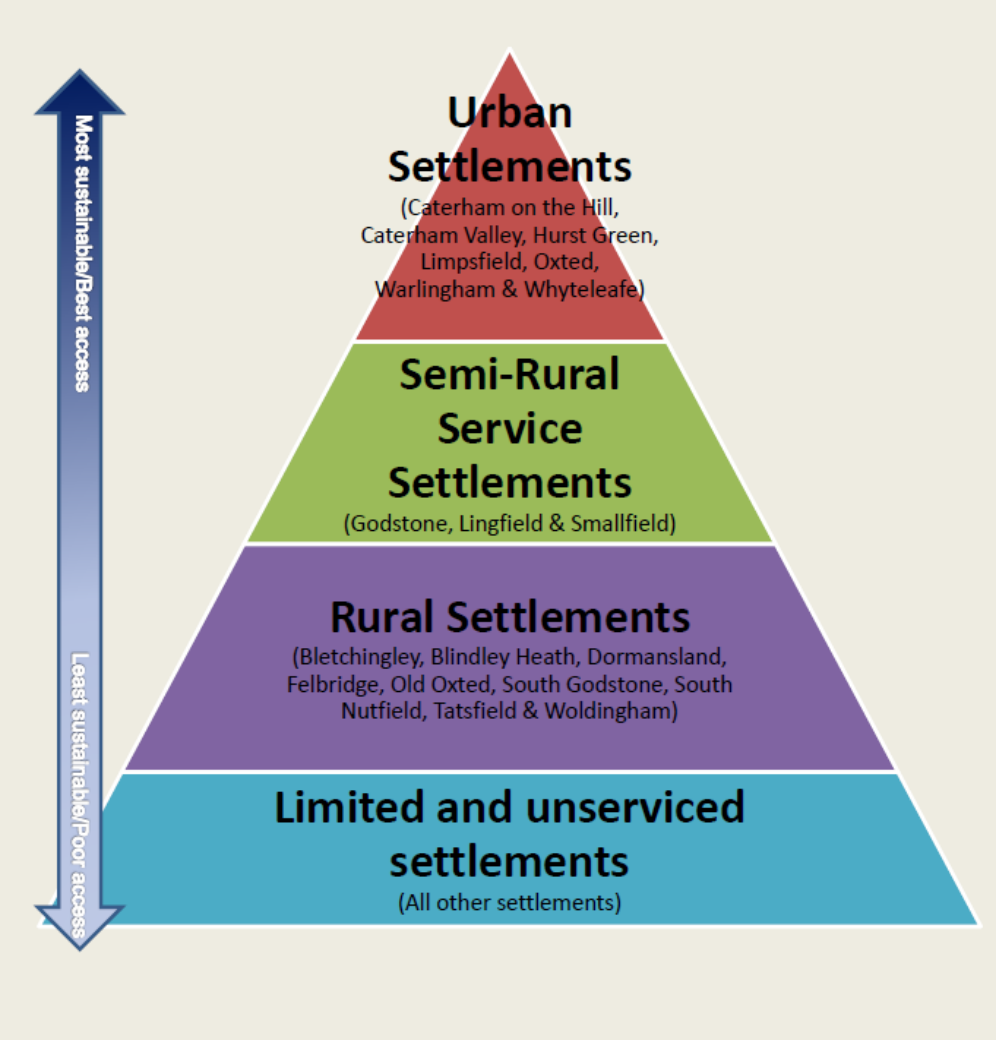
188. Understanding an area's settlement hierarchy is stated in paragraph 17 (fifth bullet) of the NPPF as a key piece of evidence in the Local Plan preparation process. The Council recognise this and the importance of understanding the roles that different settlements play in the current network of towns and places and the opportunities that exist to improve or enhance their roles going forward. As such the settlement hierarchy and the role and function each settlement plays in the District was set out in an updated *2018 Tandridge Settlement Hierarchy Paper*, first published in 2015 and consulted on and amended based on consultation. Figure 1 illustrates the Settlement Hierarchy position in 2018.

189. The settlement hierarchy document alongside various iterations of the Sustainability Appraisal (SA)[37] looked at how well each settlement was served by facilities and services and their general sustainability in accordance with the principles set out in the NPPF. Based on a fine grain analysis, this document enabled a settlement hierarchy to be created which distinguished between larger settlements, i.e. those which generally provide the best range of facilities and accessibility such as public transport and the strategic road network, from limited serviced settlements.

190. In comparison to nearby boroughs and districts such as Guildford, Tunbridge Wells and Reigate & Banstead, Tandridge has a more polycentric development profile. This means that whilst its settlements have been ranked in terms of the criteria defining the settlement hierarchy, one settlement does not clearly stand out in in status or profile from other settlements in the District. The polycentric nature of the District's Tier 1 settlements has been a crucial driver in determining the appropriate densities to support housing growth, in so far as there is no single settlement where increased densities would be appropriate.

[37] A Sustainability Appraisal is a legal assessment to determine if the Local Plan balances the three strands of sustainability: economic, social and environmental.

**Figure 1: Local Plan Settlement Hierarchy**




*Access to services and facilities*

191. Settlements across the district provide a range of facilities which support the daily needs of residents; some have a greater range than others. However, due to the rural nature of Tandridge and indeed the wider surrounding areas of Surrey, West Sussex and Kent, there are many smaller settlements which have limited, or no facilities and residents will rely upon neighbouring areas or will travel to the larger towns such as Redhill, Crawley, Croydon, East Grinstead and Sevenoaks.

192. The Tier 1 settlements identified in the Tandridge Settlement Hierarchy Paper and assessed in the 2018 SA provide the access to the highest concentration of services and employment within Tandridge and are considered to be the most sustainable. These settlements provide homes for the majority of residents in the district and contain a good range of community facilities. People travel to these areas from other settlements within the district and from other districts and boroughs to make use of the greater retail offer, leisure facilities, education and health provisions that are located here. These areas

are connected to the strategic road networks and have good access to a wide range of public transport including rail stations with links to London.[38]

193. There are 11 railway stations in the district in both the larger built-up settlements at Oxted and Caterham, as well as in a number of the settlements throughout the area, including South Godstone and Dormansland. Services into London traverse the north to south line, with the Reading to Tonbridge line, via Redhill, flowing east to west. The district is crossed by the M25 and M23 motorways and also the A22 and A25 with good links to London and the coast, all of which serve a central function for both the community and businesses. Godstone is arguably the most significant settlement in terms of road infrastructure with the meeting of the A22 and A25 located there, as well as Junction 6 of the M25, just north of it. Gatwick Airport lies just over the district boundary to the south-west near Crawley.

*Infrastructure Provision*

194. Traditionally Tandridge has not been an area of growth and therefore has witnessed a lack of investment in its infrastructure such as its transport network and utilities. This situation has been compounded by difficulties in collecting S106 monies and the piecemeal delivery of new development which has been unplanned and of a scale that has cumulatively impacted upon the District's infrastructure and has failed to off-set its impact as a consequence.

195. Addressing this issue was identified as fundamental principle upon which the Local Plan and its Spatial Strategy should be based. As a result, through the Plan process, the Council has heavily engaged with public partners and stakeholders, as well as developers, to ensure that new development is properly served by new or existing infrastructure needed to support the additional demands created by new housing development. The infrastructure required is set out in the Infrastructure Delivery Plan that has been utilised to inform the site allocations policies and also will be a key part of the evidence for the Community Infrastructure Levy review.

*Economic Growth*

196. Evidence from Tandridge's Economic Needs Assessment 2018 ENA shows that for the low, medium and high level economic forecasts across the plan period, the District is likely to have a surplus of B2/B8 land uses for warehousing and industry but will need to provide additional employment space for B1 office use.

[38] Tandridge District Settlement Hierarchy November 2015, p.66

Table 6: Employment Needs

| B1 office demand up to 2033 | | |
|---|---|---|
| **Low** | **medium** | **high** |
| 1,415sqm (net 1,080sqm) | 7,379sqm (net 7,522sqm) | 13,861sqm (net 14,522sqm) |
| **B2 and B8** | | |
| **Low** | **medium** | **high** |
| -2.0ha (net -7.9ha) | -1.3ha (net -7.1ha) | -0.7ha (net -6.5ha) |

197. The evidence suggests that any additional need for employment space could be accommodated by intensifying the use of existing sites. This is the strategic approach that the Local Plan has followed. Under this approach 4[39] Strategic Employment Sites have been identified, of which 3 will be inset from the Green Belt to ensure delivery.

198. Notwithstanding this conclusion the ENA also identified: significant need for office provision in the district which is unlikely to be met through the existing supply. The greatest demand for office floorspace is in the town centres of Oxted and Caterham, and the supply analysis shows very little supply within these centres to meet the demand. The Council should identify additional sites within these centres to support the growth of office based employment. Alternatively, locations with excellent access to the existing population centres and labour supply as well as the strategic road network should be preferred.

199. The introduction of the permitted development rights that allow the conversion of office to residential has had an impact on office provision in the District, particularly in Caterham. Therefore, it is not surprising that more office provision is needed in our town centres. As such, the policies in the Local Plan encourage office uses in Caterham and Oxted town centres.

200. The challenge is to establish the number of jobs created through the provision of B use class employment. For example, a distribution warehouse will have a very different number of employees to a storage unit, yet both are classified as B8 use class. As such, Experian data has been used in the analysis of jobs figures through the plan's preparation.

201. As mentioned previously in this topic paper, the Experian data suggests that the working age population will be 56,200 in 2033, and a job need of 7,300.[40] Based against the provision of 7,960 homes, the SHMA identifies that the OAN housing target will accommodate the labour force needed to support the projected increase in jobs.

202. The Balancing Homes and Jobs Paper 2016 identified that at the start of the plan period, the model indicates that the relationship between jobs and homes is approximately 1.099:1. The 7,300 jobs is 0.9: 1 based against the 7,960 homes. However, this is a more accurate reflection of reality in that a lot of Tandridge residents commute to London for work.

[39] Hobbs Industrial Estate, Westerham Industrial Estate and Lambs Business Park and Godstone Road Business Park. Only the Godstone Road site does not need to be inset as it is in an existing built-up area.

203. However, the balancing homes and job paper[41] also identifies that it is a desirable policy aspiration to maintain or provide more local employment in the district, particularly to continue to support local services and to avoid unsustainable out-commuting, and therefore approximately 1.982 jobs should be provided for every household over the plan period.

204. The Experian data only considers the B class use and therefore does not take account of job creation through the provision of retail and leisure facilities, community services and construction for example. Paragraph 398 sets out more detail on jobs and homes against the Local Plan housing figure.

*Brownfield Sites*

205. In accordance with the NPPF, paragraph 17, seventh bullet, the Council recognises the need to support brownfield land and therefore has explored all brownfield sites which have not been caught by the HELAA or the Call for Sites, through an Urban Capacity Study (2017). More information on the Urban Capacity is set out in Section 4.

206. The Council prepared a brownfield register in 2017 to identify suitable brownfield sites that could be utilised for development and will continue to update this on an annual basis. The brownfield register has been updated in 2018.

207. The Council has also explored bringing empty homes back into use and making the most of our existing stock. In addition, the Council has also reviewed their own assets, and put suitable sites forward in the HELAA. However a sheltered housing review is underway, council house building programme as well as a review of the garage sites it owns. More information on all of these is set out in section 4. The Local Plan also includes a policy of making the best use of land to ensure that brownfield sites are considered and utilised to deliver housing development.

*Rural Provision*

208. The broader picture of the district's rural housing market is clear in that delivery has been driven by piecemeal development and limited infilling because of the constraints of the Green Belt.

209. As a result, plan-led opportunities for new housing have been focused on the Tier 1 and 2 settlements. In these areas, sites can generally be taken forward with a minimum of delay where those sites are readily available and no strategic infrastructure constraints apply.

210. Notwithstanding, the Local Plan recognises that the desire to boost housing supply (NPPF para 47) and promote choice in the housing market (NPPF para 9) suggests that all settlements can play a role in delivering sustainable development.

[41] 2016 Balancing Homes and Jobs Paper – Page 3, first bullet

211. On that basis the Local Plan acknowledges that supporting rural communities (NPPF para 55) is an important consideration when seeking to deliver sustainable development as a whole.

212. Whilst the Local Plan does not allocate housing in its rural areas except by way of Rural Exception Sites the Council supports the potential of delivering housing in these areas through the production of Neighbourhood Plans as long as they accord with the policies within the Local Plan. It also recognises that infilling will still occur within these settlements and contributes towards the windfall figure identified in the plan and explained in more detail at section 4 of this topic paper.

*Rural Exception Sites*

213. Paragraph 55 of the NPPF states that isolated new homes in the countryside should be avoided unless certain exception criteria are met (although 'isolation' is not defined in the NPPF or PPG). The countryside is also no longer protected for its own sake (although it remains an important consideration).

214. There is a recognition that special circumstances exist where housing in a rural area may be permissible. These circumstances as detailed in the NPPF are:

- The essential need for a rural worker to live permanently at or near their place of work in the countryside
- Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets
- Where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting
- The exceptional quality or innovative nature of the design of the dwelling
- Such a design should be truly outstanding or innovative, helping to raise standards of design more generally in rural areas:
- Reflect the highest standards in architecture
- Significantly enhance its immediate setting
- Be sensitive to the defining characteristics of the local area.

215. Whilst this may assist in providing a few additional homes, there is also scope for us to consider the use of Rural Exception Sites. In the past, there have been a number of Rural Exception Sites delivered in the District and whilst a specific figure cannot be allocated to Rural Exception Sites, they can still form part of the Local Plan land supply. A policy has been prepared that encourages Rural Exception Sites within the District to support affordable housing in perpetuity for people with a local connection to the parish it borders. In addition, it recognises that the PPG supports the provision of market housing on Rural Exception Sites if needed to enable affordable housing. However, the Council is keen to ensure the Green Belt is protected and this clause is not over exerted and therefore have set a threshold for the amount of market housing that could be provided on a Rural Exception Site.

*Neighbourhood Plans*

216. As the preparation of the Local Plan has progressed, the Council has recognised the need to consider the progress of any Neighbourhood Plans in the District along with any that have been adopted. In determining the Local Plan Spatial Strategy, the Council has been cognisant of the roles and ambitions of these Neighbourhood Plans.

217. For those Neighbourhood Plans that have progressed sufficiently far in their preparation, the Council considered what the Local Plan could do to assist in any areas that wanted to allocate sites for housing but may not be able to do easily due to the Green Belt around their settlements.

218. However, at this point in time none of the adopted or advanced Neighbourhood Plans have allocated housing in their areas.

# 4 Determining the Housing Land Supply

*Key Principles*

219. The Spatial Strategy has been cognisant of the need to consider reasonable alternatives to delivering development (as set out in the supporting Sustainability Appraisals) and more recently in the Draft National Planning Policy Framework (2018) which proposes a new addition to national Green Belt policy, namely:

> *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development"*

220. The Spatial Strategy has sought to increase densities and develop on brownfield land where applicable. The Spatial Strategy and attendant housing sites have also responded to the quantum of delivery and distribution generated by extant planning permissions and built out sites within the early part of the plan period.

221. As opposed to the current Core Strategy which focuses 78.5% of its housing development in existing Category 1 settlements outside of Green Belt areas, the Spatial Strategy promotes a wider geographical distribution of development.

222. This approach also delivers a more diverse scale of housing sites and a more varied housing offer and will help to drive housing delivery on the ground, whilst still providing the critical mass to enable proper place-making and the creation of communities with available on-site facilities. Also, because they are more viable, by releasing greenfield sites, there is greater opportunity to increase the number of affordable units delivered.

223. A detailed assessment of alternative sites was carried out in Tandridge's Sustainability Appraisal and so is not repeated here. However, a key principle of the Spatial Strategy has been that the Council has sought to locate new housing allocations on sites that can either take advantage of existing (or planned) infrastructure, or have the capacity to deliver new facilities to a local area that would be required to meet the additional demands created. In the case of the Garden Community at South Godstone, a key driver in its allocation has been both its existing infrastructure and the potential to deliver enhanced infrastructure provision within the plan period.

224. The Spatial Strategy delivers the majority of its housing (53% - 3,206 dwellings) in the 10 years after the Local Plan's adoption. Whilst maintaining a constant housing delivery stream throughout the plan period, the ten years between 2019/20 and 2029/30 give the Plan a high level certainty of housing delivery (See Section 5).

*Understanding Land Supply*

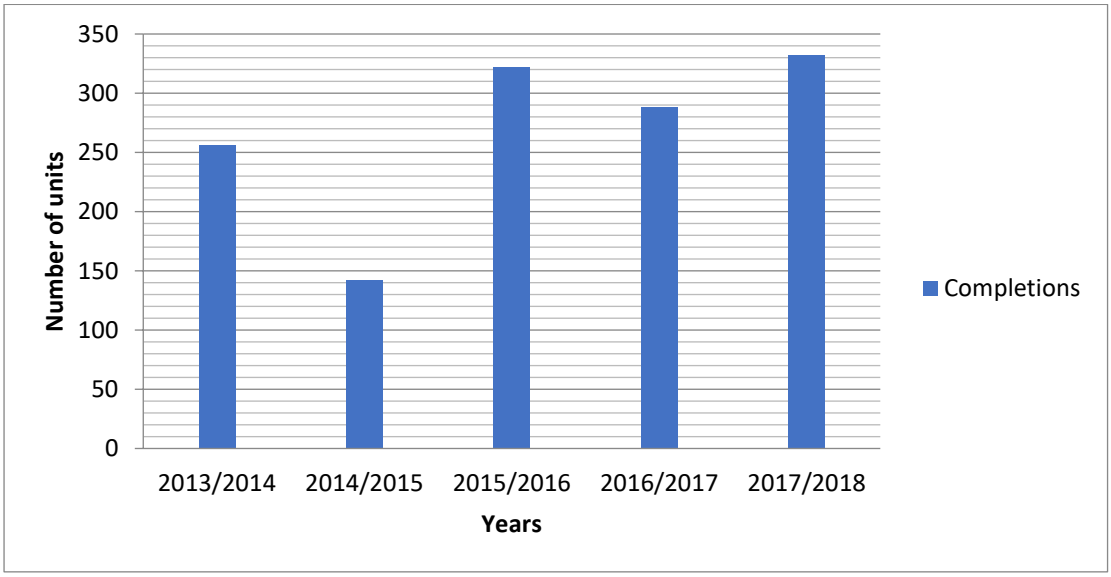
225. Historically development within Tandridge has been directed to the built-up areas and inset settlements, with limited infilling within the smaller villages identified as Defined Villages in the Green Belt.

226. Through the HELAA process, and informed by evidence base documents such as the 2017 Urban Capacity Study, the 2015 and 2018 ENA, the 2018 Caterham Masterplan, Regen Oxted initiative (see below) and One Public Estate North Tandridge, it became clear to the Council that the land supply in its traditional areas was now severely limited and would not in itself be able to support a viable Local Plan housing target.

227. On the basis that a key principle of the evolving preferred Spatial Strategy was to direct new housing to the District's most sustainable areas it became clear that additional sites in the Green Belt had to be identified. This section looks at all land supply.

228. As shown in graph 1, and taken from the Authorities Monitoring Report published annually, the first five years of the plan period from 2013-2018 have delivered 1,280 homes (an average of 256dpa). There was a low period of delivery in 2014/2015 when compared to the other four years.

Graph 1 - Completions




*Extant Planning Commitments*

229. Another 1,054 dwellings are expected to be delivered in the period up to 2020/21 through extant planning commitments. These are development sites which will come forward regardless of what the Local Plan 2033 sets out now and have already been judged to be acceptable in planning terms. Throughout the preparation of the Authorities Monitoring Report (AMR), calls are made to developers/applicants and promoters representing the larger sites to understand how they are going to be delivered and the timeframe they are considering. Some sites with planning permission have been removed from the trajectory as the Council has evidence that they are unlikely to come forward. This may be that there has been a subsequent application, the site

has changed owner, or the site has simply not been touched since it commenced 10 years ago. As such, the Council do not feel it is necessary to add an arbitrary percentage discount from the permissions, as each permission has been through rigorous scrutiny.

230. If the Council were to add a 5% discount as has been argued through the representations to Regulation 19 consultation, then this would require at least 1,106 units to be available through planning permissions, an additional 52 units above the 1,054 units in the housing trajectory. In fact the Council have removed 89 units from a total of 1,143 units that have planning permission since July 2018 for the reasons stated above.

231. From July 2018 – November 2018, an updated position on the land supply based on completions and permissions have been set out in Appendix 4. This change has not been made to the Local Plan in TLP01 as it would constitute a main modification and further permissions will be secured up till Examination. An up to date position on planning permissions will be provided as part of the Examination.

232. As a result, a significant proportion (38% - based on Appendix 3 Trajectory) of the housing growth in the District in this Local Plan is fixed through the delivery of previous and existing commitments.

*Extant Windfalls and the Future Windfall allowance*

233. Regarding the future housing windfall allowance, paragraph 48 of the NPPF allows windfall sites to be taken into account in the five-year housing land supply, having consideration to the HELAA, historic windfall delivery rates and expected future trends. With regards to historic windfall delivery, completions data shows that there is a strong and consistent rate of delivering windfall housing development in the District.

234. Completion data in Table 7 below shows that a total of 348 residential windfall dwellings have been completed since 2006–2018 at an annual average of 29 units.

Table 7: Historical Windfall Delivery

| Table showing small site windfall completions (sites of 4 and under) between 2006 and 2017 | **Total Small Site Windfall Completions** | **Total Small Site Windfall Completions on Residential Garden Land** | **Total Small Site Windfall Completions <u>Excluding</u> Residential Garden Land** |
|---|---|---|---|
| **2006/2007** | 53 | 19 | 34 |
| **2007/2008** | 51 | 26 | 25 |
| **2008/2009** | 40 | 17 | 23 |
| **2009/2010** | 46 | 21 | 25 |
| **2010/2011** | 37 | 16 | 21 |
| **2011/2012** | 39 | 12 | 27 |
| **2012/2013** | 64 | 31 | 33 |
| **2013/2014** | 82 | 41 | 41 |
| **2014/2015** | 38 | 20 | 18 |
| **2015/2016** | 66 | 33 | 33 |
| **2016/2017** | 18 | 10 | 8 |
| **2017/2018** | 78 | 18 | 60 |
| **Total** | **612** | **264** | **348** |
| **Average** | **51** | **22** | **29** |

235. Whilst the Local Plan promotes a strategic, plan led, approach to managing development and a departure from piecemeal development in the future, it is considered highly likely that this consistent rate of delivery from windfall sites will continue. Confidence in this rate is reinforced as a consequence of the Government's extension of 'permitted development' rights for changes of use from non-residential to residential uses via the prior approval process. In addition, the Council, in its Local Plan policies, will support the provision of housing introduced through Neighbourhood Plans including those in rural areas, providing these plans accord with the Local Plan's overarching policies.

236. To ensure that there is not double counting of the data, Table 7 above only considers completions. Permissions and windfalls commence from 2018/2019 and are both separate areas of housing supply.

237. Based on the above, it is reasonable to assume that residential windfall schemes will continue to play an important role in helping to meet the District's housing requirement over the next 5 years and across the Plan period as a whole to 2033. Further, the Local Plan sets out policies that enable infilling within settlements and rural exceptions sites to be delivered, both of which are not included within the housing supply on their own merits, and consequently can only be provided as 'windfall'. As a result the Local Plan assumes a proportion of the housing requirement will be met through future windfalls on small sites (29 units pa in the years 2018/19-2033), bringing the overall estimated unidentified future windfall total to 435 units.

*Vacant and Empty Homes*

238. There are four types of empty homes that fall outside exemptions for Council Tax:

- Furnished
- Caravans / work related – empty caravans and second properties used as work related dwellings
- Unfurnished / unoccupied for more than 6 months; and
- Left empty for two years, furnished

239. For the purposes of this supply paper, the last two are relevant due to the ability to proactively bring them back into use. Previous records show that, the total number of long term[42] empty properties at any one time in Tandridge is around 350 units (see Table 4 below). Please note the data for the breakdown between the two categories was not collated until 2016 and therefore only the total number of empty homes are available from 2010-2016.

Table 8: Empty / Vacant Homes

| Year | 6 months empty | 2 years empty | Total |
|---|---|---|---|
| 2010 | | | 332 |
| 2011 | | | 325 |
| 2012 | | | 333 |
| 2013 | | | 255 |
| 2014 | | | 274 |
| 2015 | | | 290 |
| 2016 | 162 | 66 | 228 |
| 2017 | 283 | 71 | 354 |
| 2018 | 267 | 89 | 356 |

240. Due to constantly changing nature and number of these properties it is difficult to predict the net gain in the number of properties brought back into use over an extended period.

241. The OAN 2018 identifies that it has allowed for 2.84% empty and second homes (based on average from the Council Taxbase for 2014-16). This suggests a housing need of 332 homes a year over the Tandridge Plan period of 2013-33. Over the plan period a total of 9 units per annum have been considered as part of the OAN. However, as seen from Table 4 above this is an underestimation of the number of empty homes in the District per annum.

[42] Long term empty properties have been empty for in excess of 6 months.

242. If the Council were to take 302 empty homes as an average per annum (2,420 units over the 8 years in Table 8), then removing 9 units from this total still provides a 293 (rounded to 290) units available to be brought back into use per annum.

243. The Council is pursuing a proactive programme and in 2018 employed the company Capacity Grid and Reigate and Banstead to identify Vacant and Empty Homes in the District.

244. Reigate and Banstead identified 75 homes and Capacity Grid identified 63 properties, creating a total of 138 properties within the District. The 138 properties are in addition to the 356 properties in Table 4 as these were ones where premiums were being paid and where the Council had not been informed that they were long term empties.

245. As part of this work, the Council employed property inspectors in 2018 to proactively start bringing properties back into use. From 2017 – 2018, the Council brought 15 homes back into use. These properties did not require planning permissions to bring them back into use and therefore have not been counted within 'permission and completions' part of the supply.

246. The Council have also prepared a Housing Strategy, which is due to be considered for adoption by the Housing Committee in January 2019. The Housing Strategy sets out a commitment for the Council to prepare an Empty Homes Strategy and to bring 20 units back into use per annum.

247. As part of the Council's proactive campaign to bring empty and vacant homes back into use the Council have included empty homes within the supply from 2018/2019 and as such 300 units have been added to the housing supply under 'Other', as shown in Appendix 3.

*Further Studies*

248. Further studies which have contributed to the Council's understanding of land supply and the development of its Spatial Strategy include:

- Urban Capacity Study
- The Caterham Master Plan
- Regeneration Oxted
- Brownfield Land Register
- Review of Council owned assets
- Review of Council's Sheltered Housing Provision
- Council House Building Programme
- Economic Needs Assessment 2015/2017 and Retail and Leisure Study 2015/2018

249. Each of the studies provided urban sites to be considered and utilised towards housing land supply, but at the same time providing opportunity to create places and shape towns and communities.

*Tandridge Urban Capacity Study 2017*

250. In response to the need to deliver new housing within Tandridge and the Housing White Paper, published by the Department for Communities and Local Government (now Ministry of Housing, Communities and Local Government) in February 2017, (which sets out proposed change to national policy on how exceptional circumstances should be demonstrated, including 'optimising' the proposed density of development and brownfield land), the Council, through its wider evidence base, explored the opportunities to make best use of existing built areas, namely the Tier 1 and 2 Settlements, both in terms of redevelopment and optimising densities.

251. Consequently, the Council commissioned consultants ARUP to undertake an Urban Capacity Study in 2017 whose remit was to:

- Identify additional sites which have not currently been included in the HELAA process within existing sustainable settlements, to assist in potentially boosting land supply within settlement boundaries.

- Robustly assess the baseline and optimised densities across sustainable settlements, in order to boost delivery within settlements and demonstrate exceptional circumstances if required.

252. Section 11 of the NPPF 2018 relates to "Making Effective Use of Land", with a sub section on "Achieving Appropriate Densities". In this section achieving optimised densities was stressed especially in areas:

> *Where there is an anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site (NPPF para 123).*

253. It also goes on to state that:

> *local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

254. Whilst the Council aim to submit the Local Plan before the transitional deadline of 24 January 2019, and it will therefore be examined against the NPPF 2012, in the absence of an adopted Local Plan post NPPF 2012, the NPPF 2018 is applicable for planning applications. As such, planning decisions will be made on the basis of making effective use of land and setting a precedent for an area, However, saying this, it is highly unlikely that any developer or landowner would not want to make effective use of the land and therefore this policy has always been applicable.

255. Further the Tandridge Urban Capacity Study considered the character and setting of its settlements, and a search for sites to maximise the use of brownfield land. This allowed the Local Plan to optimise densities on its housing sites and within the 6 character areas addressed within the Study.

These densities were then cross referenced against the proposed yields submitted by the site promoter in terms of the HELAA sites and the local knowledge of Council officers, taking into account the need for infrastructure provision on site.

256. As part of this study a total of 16 brownfield sites not included in the HELAA were assessed (see Brownfield Sites section below).

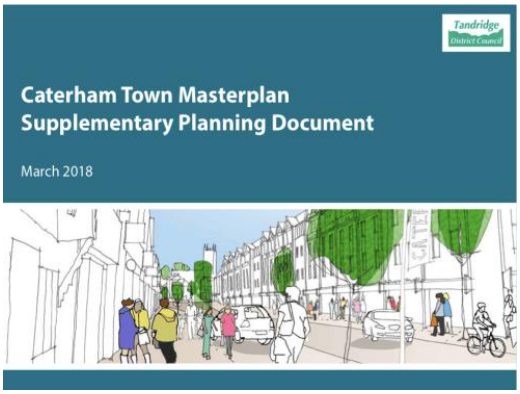
257. This identified 16 sites across the top three tiers of the Settlement Hierarchy, and therefore it included settlements which are inset from the Green Belt and settlements which are washed over by the Green Belt, but which have defined boundaries within which limited infilling may be permissible. Of the 16 identified 9 were within settlement boundaries (Caterham, Warlingham, Whyteleafe, Oxted and Lingfield), and using the optimised densities could provide approximately 300 dwellings. Existing Brownfield sites have also been identified through the Council's regeneration schemes and its process of identifying empty/vacant properties.

258. Of these sites, 3 have been allocated in the Local Plan providing 75 dwellings, using the optimised densities recommended in the Urban Capacity Study. The other 13 sites serve as car parks associated with railway stations or supermarkets, or are actively used for other purposes, and in terms of NPPF principles are unsuitable for development. Tier 3 sites were discarded as not being in accordance with the Local Plan's overarching Spatial Strategy. This reinforced the findings that a limited amount of land supply was available.

*2018 Caterham Masterplan SPD*

259. The main objective of this Supplementary Planning Document (SPD) is to provide a framework that facilitates the regeneration of Caterham Valley and Caterham on the Hill. The principle objectives and the key issues and community aspirations for Caterham detailed in this SPD are to:

- Improve the quality and quantity of the retail offer
- Improve the leisure, culture and community offer in the town centre
- Improve the environment for pedestrians and improve accessibility
- Improve the quality of short stay and long stay car parking
- Provide high quality living within the town centre
- Create opportunities for existing and start-up businesses to grow
- Promote sustainable development



260. The Caterham Master Plan area will contribute 190 dwellings to the Local Plan Housing Target through allocation HSG20 and sites CMP1, CMP2, CMP4 and CMP6 in Appendix 2.

*Relevant Planning Applications*

261. There have been several large planning applications in the two Caterham study areas. The main ones are noted below:

*Former Rose and Young Site*

262. Redevelopment of the former Rose & Young site in Caterham has been a long standing objective of the Council.

263. The privately owned site has remained unoccupied for many years and the Council, residents and businesses are unhappy with the run down appearance of the land and building as well as the lack of contribution to the town centre.

264. A series of planning applications have been submitted for this site since 2014. The last major application submitted was in 2016, was for a mixed-use development and was approved by the Council. The permission granted development for 48 residential dwellings, with a supermarket on the ground floor.

265. The development has now commenced and it is programmed within the Local Plan Housing Trajectory to be completed in 2020.

*Raglan Precinct*

266. An application for a 3/4 storey building for 19 units and associated facilities was refused on this site in 2005. Another application for 14 residential units, 2 office units and 1 retail unit was submitted and approved in 2013 but has not progressed. This would have been one of the applications removed from the permissions in the five year supply.

*Quadrant House*

267. Quadrant House has prior approval for change of use from offices (Class B1) to a use falling within Class C3 (dwelling house). In keeping with the Masterplan, the aspiration is to provide a mixed use development, retaining the anchor retail use and ensure a complementary approach to Church Walk Shopping Centre and Croydon Road.

*Regeneration Oxted*

268. Regen Oxted is an ambitious plan to revitalise the town-centre through a multi-million pound programme of strategically important projects. Comprising 4 key projects, the programme will deliver:

- Redevelopment of the Gasholder
- An Urban Redesign Project for Station Road East & West
- Additional parking capacity

- Creation of a business hub


269. The programme will be delivered in partnership between Tandridge District Council, Surrey County Council, Coast to Capital Local Enterprise Partnership, St William property developers and the Love Oxted Business Improvement District. Alongside the improvements to the area, Regen Oxted will contribute 60 units to the supply. This does not include the applications specified below as they are recorded within the permissions set out in Appendix 3.

*Oxted Gasholder*

270. Redevelopment of the Oxted Gasholder is an intrinsic element in Regen Oxted's plan. In 2017 planning permission was granted for 77 apartments and it is programmed within the Local Plan's Housing Trajectory to be completed in 2022. Subsequently, a planning application has been submitted for 111 apartments, with an enhanced access route, landscaping and associated car parking. The proposed development consisting of 20 x 1 bed, 70 x 2 bed and 21 x 3 bed apartments, with 147 car parking spaces and 134 cycle spaces, spread across three buildings with three to seven storeys; has been determined. It is anticipated that the gas holder is to be taken down in early 2019 and as such the Housing Trajectory could increase by 34 units and further increase the five year supply. Appendix 4 sets out the supply, which includes an updated position from July 2018 - November 2018[43]. This change has not been made to TLP01: Spatial Strategy, as this is a main modification but has been included in this paper for information. Further, the permissions are likely to change up to examination and a more up to date figure will be provided as part of the Examination.

*<u>Brownfield Land Register</u>*

[43] Please note the change to the supply in Appendix 4 shows where permissions have become completions, permissions have expired and been superseded and therefore both completions and permissions have been amended to provide a more accurate picture. This means that the 34 additional units from the gas holder planning application is not seen as an increase to the permissions by 34.

271. In 2017, the Council published their Brownfield Land Register with the commitment to annually consider its update. The Brownfield Land Register identifies a minimum of 550 dwellings from a range of different sources and locations, all of which have been developed or have applications being prepared. The 2018 brownfield register includes all planning permissions since December 2017 – November 2018, and has removed units that have been completed. Consequently, there are 725 dwellings on brownfield sites on the list.

*Review of Council owned assets*

272. From the outset of Local Plan preparation, the Council has reviewed its own assets and has liaised with Homes England, NHS England and Surrey County Council to identify any publicly owned asset that could be developed.

273. The Council has put forward a number of sites through their Resources Committee. Some of these have progressed to planning application stage, for example, Boulthurst Way.

274. Homes England notified the Council that they didn't own any sites within the District but would be happy to assist in any land assembly that was needed.

275. Working with NHS England and Surrey County Council, the Council have brought forward the One Public Estate: North Tandridge initiative. A consultant has been appointed to work with all three public bodies to bring forward regeneration and utilisation of sites within public ownership. This initiative is in its early stages, but early indications demonstrate that this project could provide a minimum of 82 units, as well as enhanced community benefits e.g. at the Caterham Dene Hospital.

*Review of Council's Sheltered Housing Provision*

276. The Council has embarked on a review of its sheltered housing stock to provide better quality sheltered housing. Whilst the number of additional units is likely to be low, this initiative demonstrates the Council's commitment to brownfield sites. In addition, it has also instigated a wider review of regeneration schemes. For example, in Caterham Valley, the Council has purchased Bronzeoak House, which is adjacent to one of the Council's sheltered housing schemes and Surrey County Council library, which is likely to be used to create a better sheltered housing site. This scheme will provide around 30 units, but due to the type of accommodation have not been factored into the housing land supply.

*Council's House Building Programme*

277. The Council has started building its own Council homes funded through a combination of Right to Buy receipts, HRA reserves and borrowing. The

Council are exploring all opportunities to source suitable land for development through the Council's own land holding[44].

278. To date 18 council homes have been completed and recorded with the completions figure, and a further 119 homes are at various stages within the programme. However, as these are brownfield sites, there is a loss of existing dwellings meaning there is a net gain of 36 homes. These have been factored in the future supply under 'other' in Appendix 3.

279. Through the house building programme, the Council would aim to build some dwellings in the South Godstone Garden Community and on other sites not currently in the programme. As a figure is unknown for this, it has not been included within the future supply but should be considered as an opportunity for additional future supply above 6,057.

*Economic Needs Assessment 2015/2017 and Retail and Leisure Study 2015/2018*

280. The Council commissioned both the Economic Needs Assessment (ENA) and Retail and Leisure Study in 2015 and updated them both in 2017 and 2018 respectively. The ENA identified that there had been a significant loss of employment uses within the District's town centres, particularly Caterham, and that, to make the best use of land available, the Council needed to protect and intensify their existing employment space to meet employment need. In addition, the ENA recommended that the Council use its Local Plan to encourage more usable and attractive office space into its town centres.

281. The same approach was identified in the Retail and Leisure Study with the need to protect these uses. Although, it is noted that there has been a change in consumer behaviour towards online shopping, which has resulted in the loss of retail units, and in addition, the permitted development right order allows for conversion of retail to residential. However, it must not be to the detriment of the sustainability of a shopping parade. Even if the loss of retail was to occur, the number of residential units this would provide would be minimal. Further, the Council are committed to protecting our centres as well as encouraging town centre regeneration schemes, which provide a good mix of retail and leisure.

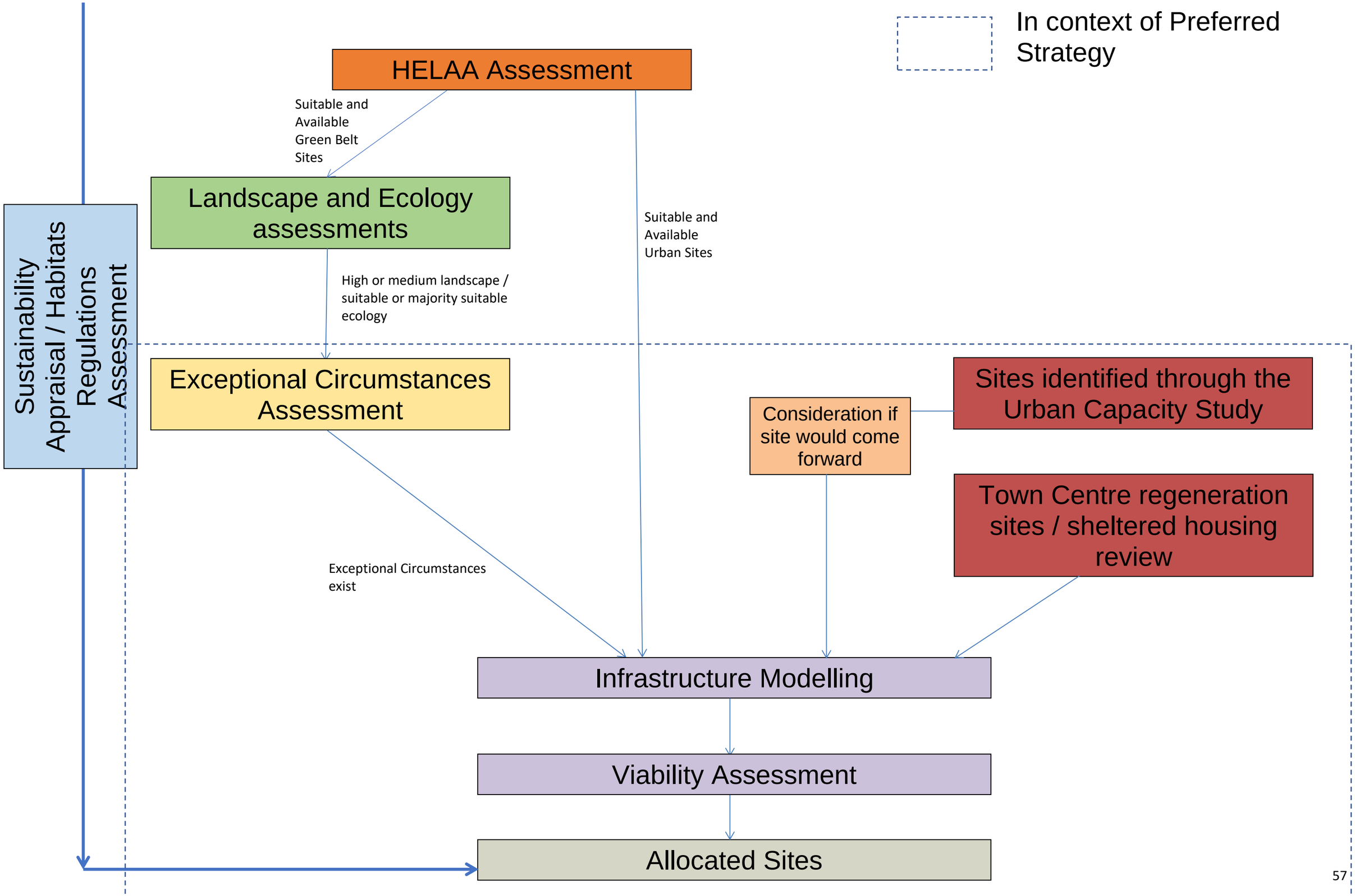
*Sites Methodology*

282. Whilst the above studies and initiatives provided a baseline for sites within urban areas, this was only a starting point. The PPG recognises the need to prepare a Housing and Employment Land Availability Assessment (HELAA). Details of the HELAA are set out in Section 2 of this paper.

283. Figure 1 below provides a simplified site selection methodology. The town centres sites listed above and included in Caterham Masterplan and Oxted Regen, and the sheltered housing review are included in the figure for a complete picture.

[44] It should be noted that whilst the Council house building programme links to the review of Sheltered Housing, these have separated in the housing land supply to avoid double counting.

Figure 1 - Simplified diagram of site selection



*Place Shaping Considerations*

284. In line with Section 7 of the NPPF 2012 (Requiring good design) and the aspirations of the Council, the Local Plan places great importance on the design of the built form and its relationship with the natural environment. To this end the Local Plan recognises that high quality design of its housing sites as a key aspect in the delivery of sustainable development.

285. Consequently, each site considered through the HELAA process has been assessed against the defining characteristics of its location in order to determine its appropriate density, scale, and visual impact when measured against sound urban design and landscaping principles. Taken together the Local Plan aspirations for these sites are that they will contribute positively to making places better for people.[45]

286. In order to inform this process, the Council commissioned a number of fine grain built and natural environment evidence based studies in the form of a Landscape Capacity and Sensitivity Study and an Ecology Assessment.

*Tandridge Landscape Capacity and Sensitivity Study 2016 and subsequent updates*

287. As part of the wider Local Plan evidence base, and independently of the Green Belt Assessment, the Council sought to understand the impact of developing sites submitted through the HELAA upon the District's landscape and to inform the Local Plan site allocation process.

288. This assessment was undertaken through the Tandridge Landscape Capacity and Sensitivity Study 2016 and was subsequently updated to address additional information provided by site promoters through consultation and any additional sites. This included an assessment of the sites' landscape sensitivity and their overall landscape value, which, when combined, produced an assessment of the capacity to accommodate development. Factors considered as part of these assessments included a site's contribution:

- to the separation between settlements,
- to the setting of surrounding landscape, and;
- its visual sensitivity and the potential for mitigation.

289. Where the outcome was that a site's capacity was negligible, negligible/low or low, these sites were no longer considered and as such the process sifted out those which would have a greater impact and would require greater levels of amelioration, leaving the ones with high and medium landscape for further consideration.

*Ecology Assessments 2016 and Subsequent Updates*

290. The assessment considered the biodiversity of sites, identifying habitats of ecological interest and advising whether sites were ecologically suitable for proposed development.

[45] 2012 NPPF, para 56

291. Where sites were identified as having few features of ecological value, or where these features can be readily protected during development, sites were categorised as ‘ecologically suitable’. Conversely sites which have features of high ecological value which are likely to be lost or damaged by development were categorised as ‘ecologically unsuitable’.

292. Some sites were also identified to be ecologically suitable, but with certain sensitivities which limit the extent of the site that can be developed, or which require the application of special design and mitigation measures.

293. Sites that were found to be ecologically suitable or majority ecological suitable were considered further.

*Green Belt Exceptions Circumstances Assessment (Part 3) 2018*

294. The NPPF para 47 states that Local 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 market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.*

295. This principle is set against NPPF para 79 which states:

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

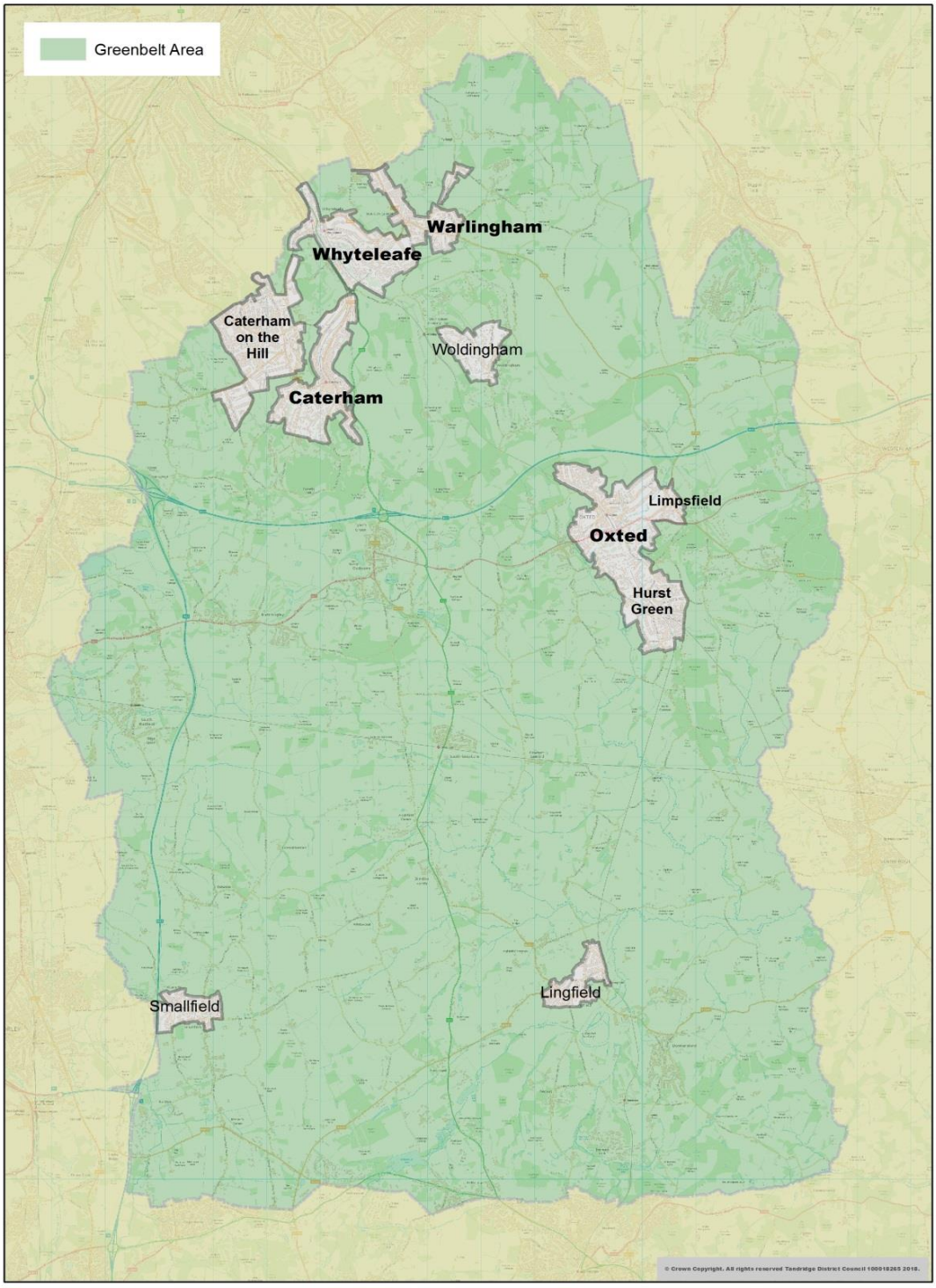
296. This is supported by DCLG’s February 2017 *Housing White Paper, Fixing our broken housing market,* stating that:

> *Local authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.*

297. As a result, the Council realised that to deliver a viable and realistic Local Plan housing target it had to assess the characteristics and potential for release of the District’s extensive Green Belt. Map 2 below shows the extent of the District’s Green Belt and the geographical location of its non-Green Belt settlements.

298. This process was conducted through a three-part Green Belt Assessment. The initial two parts of this Assessment considered how the Green Belt in Tandridge served the purposes set out at paragraph 80 of the NPPF, a consideration of the strategic concept of the Green Belt and a historic assessment of if, how, and where the Green Belt in Tandridge had changed over time. In addition, the Assessment process considered how the main Green Belt characteristic of openness was demonstrated in the District, including how existing settlements contributed and performed in terms of their openness in accordance with NPPF paragraph 86.

## Map 2 Tandridge Existing Greenbelt Area




299. As the fundamental purpose of this topic paper is to explain and justify the Local Plan's Spatial Strategy and attendant housing target it primarily references the third part of the assessment entitled *Green Belt Assessment Part 3: Exceptional Circumstances and Insetting,* which was undertaken to:

> 'Establish whether there is any land, currently designated as Green Belt that demonstrates exceptional circumstances to be released from that designation and utilised to assist in meeting development needs'.

300. A detailed analysis of Tandridge's Green Belt and the circumstances and methodology relating to its release, can be viewed in the full Green Belt Assessment which can be found on the Council's website.

301. Exceptional circumstances relating to the release of Green Belt are not defined in the NPPF, so the Council set out what factors it considered fundamental in terms of exceptional circumstances in its Spatial Approaches Topic Paper: Sites Consultation (https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Evidence-base-and-technical-studies)

302. The methodology for determining exceptional circumstances was subsequently taken forward by the Part 3 Assessment using locally relevant circumstances and those defined in the case of Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 10784 which remains the latest available case law on the matter of exceptional circumstances. The Case Law states that a Council should, at the very least, identify and consider the following matters;

i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,
v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

303. These matters were used as a basis to help determine which housing sites (and employment and traveller sites) justify exceptional circumstances and therefore contribute to the Local Plan's final housing land supply figure. They were also used to justify the release of a broad location; however, the Part 3 Assessment did not determine which of these was the preferred location. Furthermore, the Part 3 Assessment made recommendations for the insetting of settlements. In addition, to the matters listed above, the Council was also cognisant of the *2018 (then Draft) National Planning Policy Framework* which proposed a new addition to national Green Belt policy. This stated:

> *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meetings its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;*
>
> *i. makes as much use as possible of suitable brownfield sites and underutilised land;*
> *ii. optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*

*iii. has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

304. Furthermore, these sites were also assessed in terms of the level of community benefits arising from their development and their performance in relation to the character of the landscape and ecological sensitivity.

305. By considering all these matters together the Council was able to determine whether exceptional circumstances existed.

306. The sites and broad locations included in the Part 3 Green Belt Assessment went through the Local Plan sifting process outlined earlier in this Paper which included but was not limited to successive iterations of the District's HELAA. More information on the process set out below can be found in the Green Belt Part 3: Exceptional Circumstances and Insetting Paper 2018.

*Process*

*(i) The acuteness/intensity of the objectively assessed need*

307. Under this matter, which is to understand the acuteness/intensity of the objectively assessed need this paper has argued that in policy, sustainability, legal and place shaping terms the housing need baseline against which the final Local Plan housing target should be considered is the SHMA 2018 OAN figure of 7,960 homes.

308. Under the matter above, which requires a wider judgement around the acuteness/intensity of objectively assessed need, the determined figure should be framed against the NPPF's overarching policy aim of sustainable development. Therefore, whilst the SHMA OAN figure noted above is a narrow quantitative housing measurement, the degree of acuteness associated with this figure is influenced by the wider external factors associated with sustainable development, namely its economic, social and environmental dimensions.

309. In this case, the history of Tandridge's housing delivery which has not kept pace with infrastructure provision, the pressure of competing land uses, the performance of its town centres[46], along with the limitations of increasing density within the District and development on Brownfield land, strongly suggest that the acuteness of objectively assessed need, when seen as an absolute figure measured against sustainability objectives and land supply should be measured as high.

310. This conclusion is particularly relevant when assessing the second matter below.

[46] With the attendant risk of becoming dormitory towns unless a mix of employment, retail, leisure and housing uses are maintained.

*ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development;*

311. This paper has already set out the background on the inherent constraints on supply/availability of land to support sustainable development. For the purposes of clarification these are:

- Exhausted opportunities for infilling with Tier 1 and 2 Settlements.
- Competing land uses for example through Employment and retail.
- The nature and degree of sustainability inherent with the District's settlement structure as detailed in the Settlement Hierarchy.
- The polycentric nature of the District and the extent of the Green Belt which militates against the clustering of new sites on this land which could in turn increase density and the level of available land.
- Historical piecemeal development resulting in strains on infrastructure provision.
- NPPF social, economic, environmental policies supporting sustainable development.
- The inherent environmental constraints of the District e.g. the level of Green Belt, AONB, and Flood Zones in the District.

312. In terms of land supply these constraints restrict the quantum of land available for consideration. Consequently, because of the constraints listed above and Council's exceptional circumstances methodology a proportion of its edge of settlement sites delivering approximately 2,572 dwellings had to be discarded as they did not have exceptional circumstances in the Council's Green Belt Assessment Part 3.

313. Of additional consideration under this matter is the intrinsic connection between matter 2 and matter 1. In this instance, the inherent constraints on the availability and supply of land need to be contextualised against the severe acuteness of need measure, which responds against the framework of sustainable development.

314. The level of constraints associated with the availability of Tandridge's land supply also need to be cross referenced against the level of need quantified by the Council's evidence base documents such as GTAA 2017 and ENA 2017. These outline the level of competing land uses within the District and relate that to the Council's Settlement Hierarchy, which has informed the Local Plan's Spatial Strategy and which directs development to the most sustainable locations.

*iii) The consequent difficulties in achieving sustainable development without impinging on the Green Belt;*

315. The following approaches were explored through Tandridge's Issues and Approaches consultation in 2015, with regards to the potential for delivering the District's development needs without impinging on the Green Belt.

- Approach 1 was a 'do nothing' approach based development built out or granted permission since 2013.

- Approach 2a considered sites within the inset areas of the District at a density of 30 dwellings per hectare and the intensification of existing employment sites within inset areas.
- Approach 2b considered sites within the inset areas of the District at a density of 70 dwellings per hectare and the intensification of existing employment sites within inset areas.

316. Approach 1 was not considered through the December 2015 Sustainability Appraisal (SA) as it is not a reasonable alternative. This is because it would not address the District's housing need, now or in the future, nor would it provide the infrastructure or affordable homes needed and it would not contribute to the District's economy, help improve affordability or reduce out commuting. More importantly it was a moment in time assessment of completions and permissions, which over time would inevitably increase.

317. Approach 2a and 2b were tested against the 16 East Surrey Sustainability Appraisal objectives used to assess the vision, objectives and policy approaches, of the emerging Local Plan.

318. At the point in time of the 2015 SA, 1531 dwellings had either been built or permitted since 2013, with no increase in employment. Approach 2a would have allowed for 2336 dwellings and 3.2 ha of employment, whilst Approach 2b would have resulted in 3403 dwellings and 3.2 ha of employment.

319. For Approaches 2a and 2b the SA concluded that they scored very poorly in terms of objective 1, which seeks to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford, with both of these approaches falling significantly below the District's objectively assessed need.

320. Furthermore, as land supply is limited within the urban areas, and as many of the sites that would come forward are likely to be small, it was found that this would also result in a limited scope to provide affordable housing.

321. These approaches also performed poorly against objective 6, which seeks to support economic growth which is inclusive, innovative and sustainable and objective 7, which seeks to provide for employment opportunities to meet the needs of the local economy.

322. In addition, whilst against objective 2, which seeks to facilitate the improved health and wellbeing of the whole population, these approaches are considered likely to have a neutral/negligible impact, there remain concerns that in the long term the cumulative impacts of small scale development will increase the pressures on services and facilities, leading to a negative impact with respect to this objective.

323. Therefore, whilst these approaches performed well in relation to the environmental objective of sustainable development, and would not impinge upon the Green Belt, they performed poorly in relation to the economic and social objectives.

*iv)The nature and extent of the harm to the Green Belt (including the wider Green Belt and those parts of it which would be lost if the boundaries were reviewed).*

324. Whilst Part 3 is part of the wider Green Belt Assessment its role was to consider sites and the existence of exceptional circumstances. Therefore, Part 3 of the Assessment to which this Paper relates considered land which is suitable, available and deliverable, which accords with the Council's preferred strategy and which is acceptable in relation to other evidence.

325. Accordingly, in applying the exceptional circumstances test and addressing the matter above, the Council has considered both:

- Harm resulting from the lost ability of the land to serve one or more of the Green Belt purposes; and
- The impact on the ability of the wider Green Belt to meet Green Belt purposes and to contribute to openness if development was implemented.

326. The assessment for each site is set out in a pro-formas included in the Part 3 Assessment.

*v)The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest practicable extent.*

327. The Council has undertaken extensive research under this matter through the District's Tandridge Landscape Capacity and Sensitivity Study, the Ecology Assessment and the Tandridge Urban Capacity Study 2017. The Council has also considered community benefit as part of the Green Belt Assessment.

328. Furthermore, the Part 3 Assessment considers, in areas where Green Belt boundaries are to be amended, what would constitute a robust and permanent.

*Green Belt Summary*

329. Through the exceptional circumstances assessment, 43 edge of settlement sites for housing, delivering approximately 3,655 dwellings, were identified as being suitable for consideration through the Local Plan designation process.

330. Of the 43 sites taken through the site allocation process 14 of these sites, delivering a total of 1,033 dwellings, have been allocated within the Local Plan.

331. In considering the matter of exceptional circumstances, the Council has had regard to the five Calverton principles at a strategic level but also at site level.

332. However, in order to ensure a locally derived approach, its consideration of exceptional circumstances has also included consideration of the wider evidence base, potential mitigation measures, the existence of any issues which are potentially not mitigatable and any community benefits that may be

derived should a site be developed. To ensure a consistent approach a set of questions were asked for each site. The responses to these questions were then drawn together in a final discussion section, where they were balanced in order to arrive at a conclusion as to whether or not a site had the necessary exceptional circumstances in order to justify its release from the Green Belt and thus to make a contribution to the land supply for housing, travellers and employment. The potential to provide community benefits, but particularly the scale and nature of the community benefits that could be secured from a site's development, has been an important factor in determining which sites are considered, as has whether the impact on the Green Belt, particularly the wider Green Belt, can be satisfactorily be reduced and an appropriately robust and defensible boundary can be secured.

333. These considerations have been taken into account when determining which sites under Green Belt exceptional circumstances should be released.

334. On that basis it is considered that the Local Plan housing target is justified in terms of the quantum of land (and its housing yield) eligible for release from the Green Belt under the terms of the NPPF exceptional circumstances test.

*Infrastructure Modelling - Complementing and Enabling the Delivery of Infrastructure*

335. Focussing the majority of new housing development towards Tier 1 and 2 Settlements allows new development to make best use of, and improve upon, existing and planned infrastructure, whilst a key principle of the preferred new Garden Community development is the potential to build upon existing infrastructure and the capacity to accommodate new infrastructure. This approach has been supported by local service providers and stakeholders and is reflected through the work done on the Infrastructure Delivery Plan (IDP) that supports the Local Plan.

336. All sites that met the exceptional circumstances were modelled by infrastructure providers. Water companies incorporated the sites into the strategic models, the Highways Authorities added the sites to their strategic highways model and tested mitigation measures[47], discussions were had with the Clinical Commissioning Group (CCG) and School Place Commissioning at the County Council, and other providers were contacted to develop a 'live' and up to date IDP. In addition, ward members and parish councils were contacted to offer a local perspective on infrastructure concerns and these were also recorded within the IDP.

337. In order to help secure infrastructure investment, the Council has passed the Expression of Interest Stage in the Housing Infrastructure Fund (HIF) bid process and has been asked to put a business case together for infrastructure improvements. In addition, the Council is reviewing the CIL Charging Schedule whilst looking at opportunities offered by the Local Enterprise Partnership. Furthermore, the site policies contain where on site or financial contributions should be made by the developer to mitigate the impact of the site.

[47] Strategic Highways Modelling and Strategic Highways Mitigation 2018

338. The variety of infrastructure coming forward as a result of South Godstone development includes the delivery of a new secondary school, three primary schools, highway and junction improvements, railway upgrades and a new health centre which will serve the wider area, although the exact natures of this infrastructure provision will be detailed in the forthcoming AAP.

339. It is worth noting that some sites that were included in the infrastructure modelling have since been removed. This is mainly down to emerging evidence, such as the latest HELAA making a judgement on the site that no longer finds it acceptable for residential development. Furthermore, and for the same reason, some of the numbers of units within a site have changed. The Council's view is that as no additional sites have been added, the infrastructure modelling tested a worst case scenario and therefore is confident that the sites allocated can mitigate their impact.

340. The IDP also includes estimated costs based on discussions with infrastructure providers and similar schemes elsewhere. Consequently, most infrastructure requirements, particularly flood mitigation and highways will need to have options appraised and feasibility tested before improvements are delivered on the ground.

341. For the reasons set out above, some sites have had to be put back later in the plan period. A good example of this, is HSG 11 (GOD 010) that can only be delivered when the relocation and expansion of Pondtail Surgery from Godstone to the South Godstone Garden Community has been provided.

*Viability Assessment*

342. Paragraph 173 and 174 of the NPPF requires plans to be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The Local Plan and its sites were tested through a viability assessment, which included a cost per unit for s106 contributions, a range of CIL cost and different levels of affordable home provision (20%, 35% and 40%).

343. Whilst the majority of sites were viable with a higher CIL rate and with 40% affordable housing, sites within the town centres were only likely to be viable at a lower CIL rate and at 20% affordable housing. As such, the Local Plan policies were revised to take account of this. Where it can be demonstrated that affordable housing provision makes a site unviable within a town centre, in liaison with housing officers, commuted sums would be accepted.

*Allocated Sites*

344. Utilising a robust and effective methodology in accordance with the NPPF, the Council was left with sites that could be allocated in the Local Plan. Where a number of sites were adjacent to one another and may have been identified through different sources, i.e. the HELAA and the UCS, they have been amalgamated to one site allocation in the Plan and give a new reference number (HSG). More detail on the allocated sites is section out in Section 5.

*Sustainability Appraisal (SA)*

345. During the three years of plan preparation, the Local Plan has been subject to a Sustainability Appraisal to ensure a sustainable option has been taken forward. This paper will not go into the detail of all the sustainability

appraisals, which are available to view on the Council's website, but it is important to note that the Sustainability Appraisal supporting the Local Plan contains an extensive assessment, review and update of all the strategy options and the suitable and available sites considered, to ensure the plan is sustainable in line with the NPPF and Regulations.

# 5 The Local Plan Housing Target

346. The Local Plan Spatial Strategy is considered to be a sound planning approach which facilitates the development of a varied range and size of sites to accommodate new housing growth in a way that will give the market a number of opportunities to deliver.

347. Appendix 2 sets out the sites referenced in the Local Plan. It can be seen that through a mixture of sites, including a strategic site at the end of the plan period, a five year land supply can be met through small and medium sized sites on land which can be brought forward earlier in the plan period.

348. The strategy recognises what development has been delivered in the past and what is about to be delivered through existing commitments. The Local Plan also recognises and responds to the relevant environmental sensitivities and the subsequent spatial and policy approach outlined in the Regulation 19 document has been subject to a Sustainability Appraisal.

349. Through the Local Plan process the Council explored the opportunities to make best use of existing built areas both in terms of redevelopment and optimising densities.

350. Due to the significant shortfall in housing delivery when measured against the SHMA OAN figure the Council undertook a three-part assessment of its Green Belt with a view to understanding the quantum of Green Belt that could be released having assessed sites for exceptional circumstances in accordance with paragraph 83 of the NPPF.

351. Having considered whether or not sites have exceptional circumstances, the Council has identified an additional 14 small to medium edge of settlement sites, resulting in 1,033 new dwellings. In addition, the Council also identified a broad location in the South Godstone area for the development of a Garden Community development which is planned to deliver approximately 1,400 dwellings by the end of the plan period. The total allocations on current Green Belt land amount to 2,433 dwellings, which is just under half of the total land supply.

352. Post the Local Plan adoption in 2019 when Tier 1 and 2 settlement sites are added to the edge of settlement sites released under Green Belt exceptional circumstances, the new Garden Community development, along with completed sites, extant planning permissions, windfall sites [48] and those homes renovated under the Council's Empty Homes programme, the Local Plan's total housing supply over 20 years is 6,057 dwellings (see Table 9 below).

[48] See Section 4 and the Sub Section on Extant Windfalls and the Future Windfall allowance

Table 9: Housing Supply Typology

| Supply | Yield | Designation |
|---|---|---|
| Already Constructed | 1280 | GF/BF |
| Existing consents | 1054 | GF/BF |
| Windfall | 435 | GF/BF |
| Empty Homes | 300 | BF |
| Sites | 493 | BF |
| Sites | 1095 | GF |
| Garden Community Development | 1400 (from 2026) | GF |
| **Total** | **6,057** | BF/GF |

*Existing Settlement Inset Areas*

353. The Urban settlements of Caterham on the Hill, Caterham Valley, Hurst Green, Limpsfield, Oxted, Warlingham and Whyteleafe, and, to a lesser extent, the Semi-Rural settlements of Godstone, Lingfield and Smallfield have a long-standing history as being the primary service and retail settlements in the District with the highest populations and best connections to public transport.

354. As the Local Plan explains, there are limited opportunities within the existing inset areas[49] to focus significant levels of new housing development. In many cases, the opportunities that historically existed are now either subject to an extant planning approval or have already been constructed.

355. Notwithstanding, post adoption of the Local Plan, the existing inset areas will accommodate 507 new dwellings over 13 sites amounting to 30% of the total designated sites (1670) and 8% of the total housing figure. Of the 1280 sites delivered between 2013 and 2018, at the time of this paper 974 (76%) of these were located in urban areas.

*Urban and Semi-Rural Edge of Settlement Housing Sites*

356. In response to the limited available land within Tandridge's urban and Semi-Rural settlements and the need to deliver a robust Local Plan housing target which reflects the principles of its Spatial Strategy, it was necessary to determine where additional land on the edge of these settlements (e.g.in the Green Belt) could and should be released for new housing development.

357. Through the HELAA and Local Plan preparation process 43 edge of settlement sites delivering 3,655 dwellings around the Urban and Semi-Rural

[49] An inset area is defined as a village/town that is not included within the designation of Green Belt.

settlements were identified for assessment for exceptional circumstances and are part of the Part 3 Green Belt Assessment.[50]

358. Of the 43 assessed sites 14 sites have been justified for removal from the Green Belt and will deliver a cumulative total of 1,033 new dwellings[51].

*Discounted Edge of Settlement Housing Sites*

359. Around 300 sites were submitted through the HELAA process, of those 127 edge of settlement sites delivering approximately 22,550 dwellings, and were identified as being suitable. Following the application of evidence and the wider Local Plan preparation, 22 sites delivering around 1,200 units have been identified for allocation.

360. Of the 43 edge of settlements sites considered as part of the exceptional circumstances assessment, 29 were discarded.

*Potential Inset Settlements*

361. Of the 12 areas identified by the Part 2 Green Belt Assessment as not meeting the paragraph 86 openness test in the NPPF (see below), Part 3 of the GBA has recommended that Godstone be considered for insetting due to this factor and its sustainability. Paragraph 86 of the NPPF states as follows:

> *If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.*

362. As the only nominated Tier 2 settlement it accorded with the Local Plan Spatial Strategy which directs development to the most sustainable locations.

363. In coming to its recommendation, the Assessment took into account the following considerations; many of which came from the District's 2015 and 2018 Settlement Hierarchy documents. The relevant considerations were determined to be:

- A physical density that was similar to the inset settlements of Smallfield and Lingfield;
- Its role as a key settlement within Tandridge despite historical measures to contain its development and expansion;
- Its proximity to and accessibility to the Strategic Road Network.

364. In addition, it was noted that Godstone is well served by a range of shops, community facilities, a primary school and health care facilities; and through

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50 See the separate section in this Paper entitled **G**reen Belt Exceptional Circumstances Test which details the methodology and justification for releasing Green Belt housing sites under exceptional circumstances.

51 Please note GOD021 William Way Builders Merchant is not within the exceptional circumstances assessment as Godstone is to be inset from the Green Belt and therefore exceptional circumstances are not necessary. In addition, it has been granted planning permission.

previous Planning Inspectors reports, that the settlement had significant sustainability credentials, which is the golden thread that runs through the NPPF and should be encompassed into all policy considerations, including Green Belt.

365. As a result, the Part 3 Green Belt Assessment recommended that Godstone be inset from the Green Belt. On that basis Godstone settlement will deliver 168 new homes through Local Plan designations[52]. The Green Belt Assessment Part 3 also recommends that if either Blindley Heath or South Godstone is the preferred location for the new Garden Community, it should also be inset on the proviso that it would be sustainable to do so.

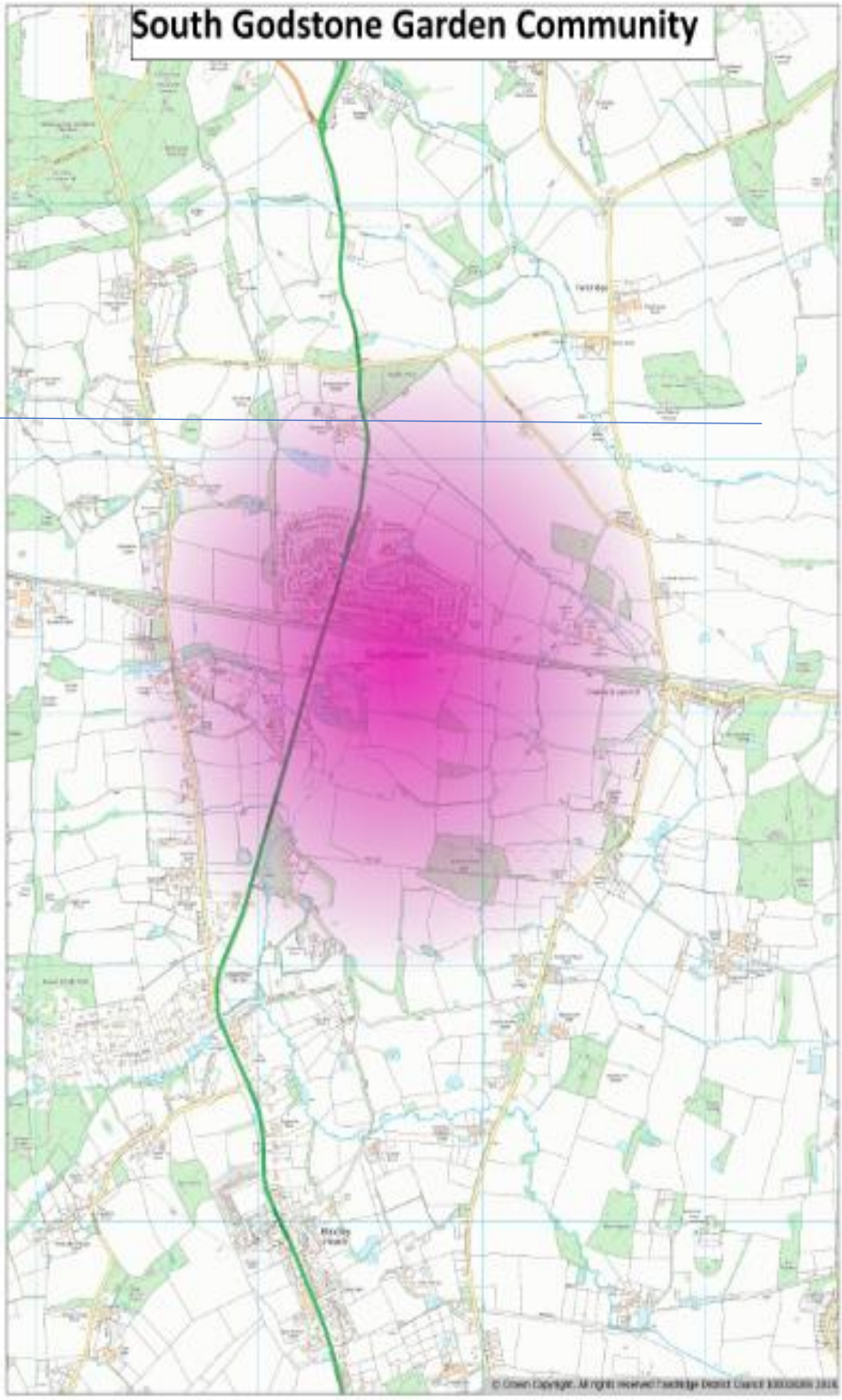
*South Godstone Garden Community Development*

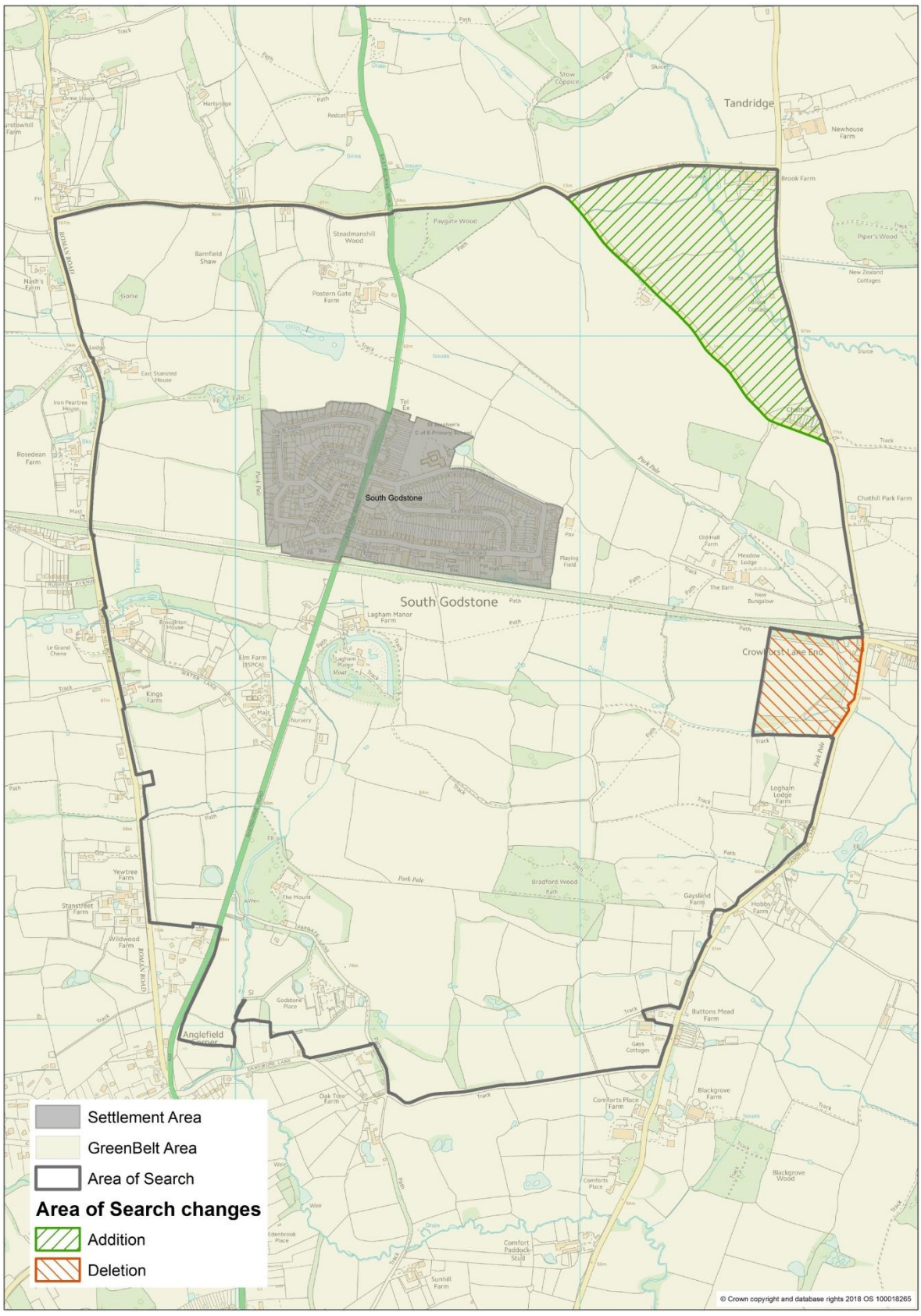
366. Located in the centre of the District South Godstone has been designated as the preferred broad location to accommodate the Garden Community.

367. The South Godstone broad location straddles areas both north and south of the railway line and is attached to the Tier 3 rural settlement of South Godstone. The A22 (Eastbourne Road) bisects the location from north to south whilst the railway line provides a clear demarcation of promotional interest between land to the north and land to the south.

[52] This figure does not include any windfalls or empty homes.

## Map 3 South Godstone Garden Community Area of Search






368. A critical element in South Godstone's selection as the preferred broad location was its deliverability and the opportunity it offered to create a mixed-use development that complemented and extended the existing built form of the village by taking advantage of existing infrastructure such as a railway station and primary school.

369. Whilst the settlement is and will be split by the railway line, it was considered that a large scale urban extension in this area would expand the settlement around the railway line and thereby potentially help to retain this service and ensure that new services and facilities could provide for the existing community and for new residents and employees.

370. Selection of South Godstone was also informed by the positive results of the Council's Employment Land Assessment Update 2017 which undertook a high level assessment of South Godstone's potential to accommodate commercial development in the context of its connectivity to the key strategic commercial locations around the District, namely: The Heart of the Gatwick Diamond and The East Surrey M25 Strategic Corridor. Although it is noted that all three of the locations considered perform well on this criteria.

371. The Council have engaged with the promoters of the three Garden Community locations on delivery and infrastructure provision. A mini Infrastructure Delivery Plan was prepared by each promoter and considered in the assessment of each Garden Village location. Where the Council had more consistent and up to date information, (i.e. the impact on Waste Water Treatment Works from the Water Cycle Study), this has been utilised. On many occasions, the Council felt the costings provided by promoters for infrastructure improvements were too low, and consequently the Council had evidence that they should be increased. This is what has been used when preparing the Infrastructure Delivery Plan published alongside the Local Plan.

372. A comprehensive list of the factors and criteria that led to South Godstone's designation as the most appropriate location for the Garden Community can be found in Appendix 1.

373. It is envisaged that the South Godstone broad location will deliver 1,400 homes (200pa) and associated infrastructure by the end of the plan period with the delivery of housing programmed to begin in 2026. The 2026 housing delivery date is based on a number of factors including the up-front delivery of infrastructure needed to support an increased population in this location and the time needed to produce an AAP and Masterplan which will determine its:

- Actual boundary,
- Quantum of Land take,
- Housing target
- Physical form and urban design,
- Configuration of transport infrastructure,
- Phasing,
- Planning Policy context.

374. It is envisaged that the Area Action Plan preparation process will commence in 2019.

375. Post the Local Plan period the development it is envisaged that the Garden Community will generate 2,600 dwellings, creating 4,000 dwellings in total.

376. It is envisaged that the Garden Community development's initial phase will be located around the existing railway station. Whilst the number of housebuilders participating in the scheme has not yet been determined, the Council envisage that a range of small, medium and large housing sites and

typologies will be developed. This approach will help to ensure a varied housing mix and speed up supply.

377. This approach will be complemented through the establishment of a site wide design code in the AAP. This will help to ensure a high quality standard of design throughout the site.

378. It should be noted that the Local Plan Housing Trajectory takes a more cautious approach to delivery rates, as it was informed by the Nathaniel Litchfield and Partners November 2016 *Start to Finish – How Quickly do Large-Scale Housing Sites Deliver?* Document, and therefore does not match the developers' own expectations.

379. Whilst the National Litchfield and Partners paper identifies that takes around 3.5 years to gain planning permission and 5.9 years for development to start on large strategic sites, the Council has committed to progressing a planning application alongside the preparation of the AAP. In addition, infrastructure requirements have been set out prior to the adoption of the AAP work and therefore work can begin on this provision as soon as is possible. Furthermore, the Council is keen to consider innovative way to speed up delivery of housing and has started to investigate opportunities for the on-site manufacturing of homes, as well as working with the Government and delivery partners to bring the development forward as quickly as possible. For more information on opportunities to speed up delivery see from paragraph 464.

*Comparing the Trajectory*

380. Based on the Local Plan's Spatial Strategy it is considered that a housing target of 6,057 dwellings between 2013 and 2033 is deliverable and is in accordance with the policies outlined in the NPPF. This equates to an annual delivery rate of 303 dwellings per annum over the whole plan period (20 years).

381. At the beginning of the plan period Tandridge contained a total of 34,034 dwellings.[53] Over the plan period the housing target generate a significant 0.9% annual growth rate in the District's housing stock, which in total results in a 17.27% increase over 20 years. This places Tandridge's housing growth rate above the England average which was at 0.7% between 2006-16.

382. If the SHMA OAN number is applied the annual housing growth rate increases to 1.2% (rounded) which is not far from major cities and inner London borough or major towns. Tandridge is a predominantly rural district, without a principal town and therefore not comparable in these terms.

[53] DCLG: Table 100 Dwelling Stock: Number of Dwellings by Tenure and District: England 2013

Table 10: Annual Rate of Housing Growth 2006-16 – Best Performing Authorities

| LPA | Annual Rate of Housing Growth - 2006-16 | LPA Rank |
|---|---|---|
| England | 0.70% | |
| Tower Hamlets | 2.20% | 1 |
| Corby | 1.70% | 2 |
| City of London | 1.60% | 3 |
| Milton Keynes UA | 1.50% | 4 |
| Uttlesford | 1.50% | 4 |
| South Norfolk | 1.40% | 6 |
| Islington | 1.40% | 6 |
| Hackney | 1.40% | 6 |
| Southwark | 1.30% | 9 |
| Dartford | 1.30% | 9 |
| Cambridge | 1.30% | 9 |
| South Cambridgeshire | 1.30% | 9 |
| Swindon UA | 1.30% | 9 |
| Forest Heath | 1.30% | 9 |
| **Tandridge** | **1.20%** | **10** |

383. Paragraph 173 in the NPPF is clear that plans should be deliverable; and there is little point in setting a housing requirement at a level which cannot be delivered, or indeed be acceptable under the sustainability principles of the NPPF. If the SHMA figure was applied, delivery would require sustaining a 1.2% pa growth rate on average across the remainder of the plan period. Considering that Tandridge is a rural district and it is 94% Green Belt, which restricts land availability, it is considered that this would be an unrealistic and disproportionate uplift in the total housing stock.

384. The final Local Plan figure of 6,057 dwellings also results in a 142% increase in the District's housing target when compared to the revoked South East Plan housing figure. This increases to 218% if the SHMA figure is applied.

385. When compared to Reigate and Banstead, a neighbouring authority, the difference between the South-East Plan requirement (500 pa) and their 2012-2027 Core Strategy figure (460pa) is minus 9 %.[54] In Mid Sussex District the percentage increase between the SEP figure (855pa) and its 2014-2031 District Plan figure (964pa) is 13%.

386. For comparison, Table 11 below illustrates the percentage increase of the SHMA and DCLG figures against current Local Plan adopted targets in the region. Table 11 compares housing delivery acceleration by local planning authorities nearby with adopted Local Plans post NPPF. The data below

[54] The South-East Plan annual housing figure attributed has been applied because the as the SEP has a 20-year timeframe and the R&B Core Strategy has a 15-year timeframe.

shows that only Sevenoaks District Council has an increase in its housing target that is commensurate with Tandridge District Councils'.

Table 11: Rate of Housing Delivery Acceleration by Local Planning Authority

| Authority Name | Adopted Local Plan housing number | OAN | MHCLG new methodology |
|---|---|---|---|
| Crawley Borough Council | 5,100 dwellings total 340 dwellings per annum annualised average | 675 dwellings per annum | 476 dwellings per annum |
| Eastbourne Borough Council | 5,022 by 2027 240 per annum | 400 | 336 (capped) |
| Lewes District Council | 345 pa (6900) | 520 | 483 |
| Mid Sussex District Council | The emerging Mid Sussex District Plan 2014-2031 sets a minimum housing provision figure of 16,390 homes. | 14,892 (an average of 876 dwellings per annum) for 2014-2031 | 1,016 dwellings per annum for 2016-2026 |
| Rother District Council | 335 net dwellings pa | 363 pa | 469 pa (capped) 737 pa (uncapped) |
| Sevenoaks District Council | 165pa - 3,300 over 20 years (2006-2026) | 12,400 (2015-35) 620 pa | 698pa |
| South Downs National Park Authority | There are several figures currently operating across the National Park but not one park-wide figure | 447 | Not applicable |
| **Tandridge District Council (Updated)** | **125 dpa** | **398** | **645** |
| Tunbridge Wells Borough Council | The adopted Core Strategy figure is 300 per annum | 648 (SHMA 2015) | 692 |
| Wealden District | 450 dwellings per annum or 9,600 in total | 950 DPA | 1247 |

| | | | |
|---|---|---|---|
| Council | 2008 - 27 | | |

Table Source: data taken from April 2018 Ashdown Forest Statement of Common Ground (p.31).

387. Whilst increasing the level of housing that an area or district needs to deliver in order to meet need is valid in its own right, it should be noted that the sustainability principles underpinning the current NPPF promote managed change. A disproportionate acceleration in a local planning authority's housing target arguably conflicts with this aim particularly when a key principle of place making is sensitively responding to the historical development and character of an area.

*OAN Target and DCLG OAN Target*

388. The Local Plan has been predicated on delivering housing in line with the economic, social and environmental principles underpinning the NPPF's definition of sustainable development. In conjunction, the NPPF strongly protects the existing Green Belt and only releases land once exceptional circumstances have been demonstrated. Therefore, the OAN and DCLG OAN targets need to be evaluated against the Tandridge District context, (which is predominantly rural in nature), its constraints and it historical settlement pattern.

389. In the NPPF 2018, the Government have published reference to the standard methodology, which includes an uplift where median house prices are over 4 times the median earnings of those working in the local authority area, as is the case in Tandridge.

390. Using this standard methodology, the MHCLG, OAN figure for Tandridge was calculated to be 645 dwellings per annum over a 10 year period (2016– 2026) and in total a delivery target over 20 years of 12,900 dwellings.

391. The Council have revised their OAN paper, where further information is provided on the standard methodology and comparisons with Neighbouring Authorities but as the Council intend to submit their Local Plan before the 24 January 2019, the standard methodology does not apply.

*Duty to Co-operate*

392. As set out in the SHMA 2015 and 2018 papers 'Defining a Housing Market Area (HMA)' Tandridge is a functional component of a HMA with Croydon, Reigate and Banstead and Mid Sussex. However, Croydon and Mid Sussex have stronger links with other areas and their evidence identifies that they form part of other HMAs; Croydon is part of the London HMA and Mid Sussex is part of the Northern West Sussex HMA.

393. The link between Tandridge and Reigate and Banstead are fairly strong and therefore consideration to how Reigate and Banstead could assist in meeting Tandridge's unmet need should be explored.

394. Reigate and Banstead have an NPPF 2012 complaint Core Strategy and an Examination in Public into their Development Management Policies was held in November 2018. Tandridge's OAN 2018 paper identifies that when considering the HMA unmet need, Reigate and Banstead have an unmet need of 184 dpa based on the SNHP 2014 and 2016 figure of 644 dpa and their adopted Core Strategy figure of 460 dpa.

395. Reigate and Banstead are to review their Core Strategy in 2019, and this will need to be in compliance with the NPPF 2018. Paragraph 60 of the NPPF 2018 sets out:

*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 – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

396. Until such a time Reigate and Banstead review their Core Strategy, there is an identified unmet need within the Borough and within Tandridge District. Both authorities will, under the Duty to Cooperate, consider this unmet need.

397. Statements of Common Ground are underway with neighbouring authorities to set out each authority's position and a commitment to continue to work together using the most appropriate governance structures, i.e. Gatwick Diamond Board, Surrey Futures or South London Partnership to assist in meeting unmet need.

*Balancing Homes and Jobs*

398. The Local Plan identifies a target of 303 homes per annum, which totals 6,057 homes for the plan period. Based on the Balancing Homes and Jobs Paper 2016 and as set out from paragraph 202 of this paper, there is a ratio of 1.099:1. To encourage self-containment and lower the number of residents who commute, the paper identifies that 1.982 jobs should be provided for every home. The growth scenario identified in the ENA 2017 is to provide 7,900 jobs, based on the allocation of 22.5ha of employment space.

399. The 7,900 jobs would require a ratio of 1.30:1, which is in-between the 1.099 and the 1.982 recommended to assist with self-containment as part of the objectives in the Local plan.

400. The 1.30:1 would provide for a reasonable balance in the aspiration of the Council to reduce the level of out-commuting from the District but also to recognise that this is also a more realistic approach in so far as people will still commute to London where higher wages can be earnt.

# 6 Five year supply

*Introduction*

401. This section deals with the Local Plan's approach to the delivery of the housing proposed over the Plan period to meet the Plan's housing target. Paragraph 47 of the NPPF sets out how local planning authorities should identify specific deliverable sites to provide a 5-year housing land supply and specific developable sites or broad locations for the latter stages of the Plan which in Tandridge's case will run from 2026 to 2033. The associated Planning Practice Guidance also explains how the tests of suitability, availability and deliverability should be considered, which has informed the full and comprehensive evidence base, including the HELAA, SA and Habitats Regulation Assessment (HRA), which supports the Plan.

402. The Council's expectations of housing delivery on allocated sites, committed sites and all other sources are set out in this Paper's Housing Trajectory (Appendix 3). These expectations are justified in more detail in the following section.

*Evidence of Delivery*

403. It is not reasonable to assume that past delivery rates indicate what rates could be achieved in the future when considering the Local Plan has been prepared in a different planning context to the Core Strategy.

404. The economic context of the last decade is well known and there is little doubt that the 2008 economic crash and subsequent recession affected the housing market, which had a significant effect on delivery rates.[55] Other external factors, such as access to mortgage borrowing and lack of growth in earnings, have also influenced the state of the housing market overall.

405. However, there are signals that the housing market in the Tandridge area is strengthening. This is furthered evidenced locally by the increase in the number of 2017/2018 housing completions.[56] It should however be noted that the Local Plan Viability Assessment 2018 identifies that an economic downturn may occur in the not so distant future, so there is a need to be mindful of the impact this may have on delivery rates.

406. The urban settlements market for flats and apartments gives an indication of the changing mood and scope of the housing market in the District (see all flats and apartments delivered list in the Appendix to the Authorities Monitoring Report - AMR - 2017/18). In addition there has been an increase in the private rented sector and the delivery of apartments to suit this sector. Recently, Tandridge has seen a number of applications considering this

[55] See SHMA 2015/2018 SHMA– Market Changes
[56] See 2017-2018 Authorities Monitoring Report

model, as it provides the market with something that is in demand and it secures high quality tenants and provides a good level of return.

407. The District's rural housing market (which is mostly focused to the south of the District) delivers smaller sites through piecemeal development and limited infilling, because most of the settlements are washed over by Green Belt. Some of the settlements within the District have also provided rural exceptions sites to assist in the supply of housing for the local community.

*Proposed Strategy and Allocations*

408. The spatial strategy focuses on development at the Tier 1 and 2 settlements, and at the South Godstone Garden Community. Development is also expected to be provided through rural exception sites and infilling, as well as through allocations that may be identified in Neighbourhood Plans.

409. Smaller sites, such as infill sites, can generally be taken forward with a minimum of delay where those sites are readily available, and no strategic constraints apply.

410. In accordance with the Local Plan Spatial Strategy the majority of the new allocations in the Local Plan will come forward in the Tier 1 and 2 settlements within current inset boundaries and re-designated Green Belt land. Therefore, it has been important for the Council to assess the potential deliverability of sites in the short and medium term and across the Plan period as a whole, as part of the plan-making process.

411. This has meant due consideration has been given through preparation of the HELAA and the Local Plan process to any land ownership or infrastructure constraints that could delay schemes being implemented, as well as taking account of appropriate lead in times on sites that may be larger or more complex, or have potential viability issues to resolve, or require a suitable level of Masterplanning (for example in Caterham and Oxted).

412. For all major sites the Council has been and will continue to be in dialogue with lead developers / housebuilders. In some cases, it is expected that either planning applications will have been lodged or more formal, detailed pre-application discussions will have commenced, prior to the Local Plan Examination. Furthermore, the Council and promoters/land owners of sites over 50 units are preparing Statements of Delivery to demonstrate that these sites can be delivered within the plan period, and also sites that can be delivered within the first five years.

413. With regards to South Godstone as the preferred broad location for the Garden Community development, the Council are working with the landowners/promoters and developers to ensure the Garden Community can be delivered and that adequate and timely provision of supporting infrastructure is made within the plan period. A Statement of Delivery is also being prepared for the Garden Community.

414. Taken together, and working with the promoters of the site, these factors have informed the Council's expectations for start dates and build out rates for proposed new allocations in the Housing Trajectory.

415. The evidence of delivery from existing housing developments and schemes already in the pipeline, along with the more strategic nature of the Local Plan, will mark a significant change of gear in Tandridge's housing delivery profile with 53% (3,206 dwellings) of the District's housing target projected to be delivered 10 years after its 2019 adoption.

416. This evidence, alongside the evidence from developers and housebuilders in terms of expected delivery rates, fully justifies the Local Plan's assessment of the expectation of existing and committed sites making a major contribution towards meeting the District's housing target over the Plan period in the short, medium and longer term.

417. It should be noted that, whilst, in the Statements of Delivery there are some differences of opinion as to when sites could come forward, these relate to the land owners, promoters and developers suggesting their sites can come forward earlier than the Council believe is likely. Each party's position on phasing is set out in the Statements of Delivery.

*Five Year Housing Land Supply*

418. The Council recognises that being able to identify a deliverable 5 year housing land supply against the Local Plan target is a fundamental element that the Local Plan needs to address. Through the HELAA and the Local Plan designation process matters of deliverability have been identified on a site by site basis taking account of a wide range of factors including any on or off-site infrastructure requirements, complexity of any on-site issues, the land ownership situation, accessibility and the need for comprehensive Masterplanning at the Garden Community development broad location.

419. The housing trajectory which supports the Local Plan sets out what the Council expects will be the timing and rate of housing delivery across the existing committed sites and the proposed allocations set out in the Local Plan. It has been based on the assessment undertaken in the updated 2018 HELAA, the Local Plan evidence base and discussions with the relevant parties.

420. Determination of a realistic and deliverable trajectory has been cognisant of the legislation around the need to deal with any shortfall in delivery against the Local Plan target and identifying a 'buffer' of up to 5% to ensure greater choice and competition in the market, (or 20% dependent on history of persistent under delivery).

421. Notwithstanding, whilst paragraph 47 of the NPPF states that Local Plans should use their evidence base to meet the full objectively assessed needs for housing in the market area there is also an explicit recognition that it is the starting point and should be achieved through consistency with other policies set out in the framework.

422. In Tandridge's case, the evidence base supporting the Local Plan indicates that the OAN figure of 398 dwellings pa totalling 7,960 dwellings over the 20 year plan period is both undeliverable and unsustainable in terms of its adherence with other policies in the NPPF.

423. Notwithstanding, the District has taken proactive steps to try and meet the SHMA OAN figure whilst respecting the NPPF policies. As outlined in Sections 3 and 4 of this report the District has decided upon a strategic planning approach that releases Green Belt following consideration of exceptional circumstances to facilitate development of both a new Garden Community at South Godstone and the development of edge of settlement Tier 1 and 2 Green Belt sites as well as other sources of supply.

424. As a result, the Local Plan deliverable and developable housing target has been determined to be 6,057 homes over a 20 year plan period.

*Recent Case law*

425. The relevant tests for establishing housing land supply have recently been the subject of discussion in the Court of Appeal. The judgement in the case of St. Modwen Developments Ltd v. Secretary of State for Communities & Local Government and East Riding of Yorkshire Council was published in October 2017 and has resolved the appropriate test for 'deliverability' in respect of determining 5-year housing land supply.

426. The St Modwen judgement makes clear that an assessment of 5-year housing land supply should be undertaken on what can realistically be delivered within that period (taking account of the Footnote 11 'tests' in the NPPF) as opposed to what necessarily will be developed. To be 'deliverable' in this sense, a site has to be capable of being delivered within 5 years, but it does not need to be certain or probable that the site actually will be delivered within 5 years. Sites can be included in the 5-year supply if there is a realistic prospect of housing being delivered on them within the 5-year period. This judgement establishes that this different, lower threshold should be used for judging the 5-year supply position for the purposes of paragraph 47 of the NPPF.

427. As set out above; through discussions with promoters and developers and careful analysis of housing supply sources set out in Section 4 of this paper, the Housing Trajectory in the Local Plan shows what the Council expects to happen. The Council, on many occasions; as set out through this document and within Statements of Delivery, have demonstrated a precautionary approach to the 5-year supply.

*A 5% buffer or 20% buffer*

428. Paragraph 47 of the NPPF sets out that local planning authorities should…

*identify and update annually a supply of specific deliverable[1] sites sufficient to provide 5 years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under-delivery of housing, local planning authorities should*

*increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition on the market for land.*

429. The PPG advises that where policies in emerging plans are not yet capable of carrying sufficient weight for decision making, information provided in the latest full assessment of housing needs should be considered. However, the PPG advises that weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints, such as Green Belt.

430. A recent appeal decision (5th April 2017, APP/M3625/W16/3163326) confirmed that the untested OAN cannot be afforded significant weight. Therefore, whilst the Council have been preparing the Local Plan and the absence of a reasonable alternative to the Core Strategy figure, the land supply has been assessed against the Core Strategy, which set a housing target of 125dpa.

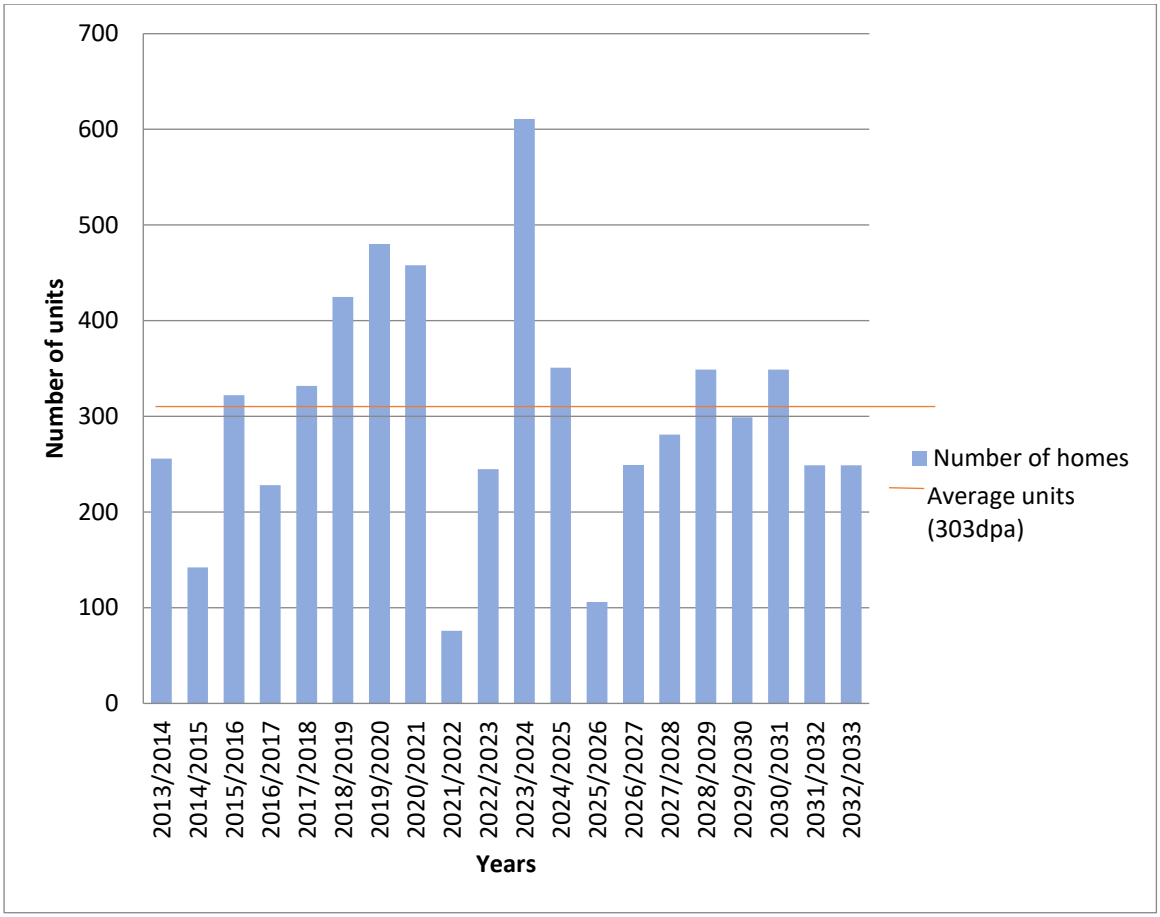
431. For the years 2013/14-2018/19, the land supply delivers over 1,705 units, which provides 341dpa. This is significantly over the 125dpa but also over the 303dpa proposed in the emerging Local Plan. As such, the Council in accordance with paragraph 47 of the NPPF should apply a 5% buffer, as there is no record of persistent under delivery.

*The shortfall*

432. Graph 2 below shows housing completions since the beginning of the Plan period and the forecasted delivery to the end of the plan period set against the Local Plan housing figure of 303 dwellings per year.

433. The graph demonstrates that in the six-year period between March 2013 and March 2019 housing completions in the District were just below the Local Plan housing figure of 1,817 for six years; at 1,705 dwellings, resulting in a shortfall of 112 dwellings. This equates to a delivery rate of 30% in the first five years of the plan, when measured against the 6,057 20-year housing target.

Graph 2 Local Plan Housing Trajectory




434. In these circumstances, Planning Practice Guidance states that:

*Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.*

435. This approach is commonly referred to as the 'Sedgefield' method. However, it is worth noting that the PPG clearly states; **'should aim'** and '**where possible'**.

*Providing a 5 year housing land supply*

436. Section 4 and Appendix 3 of this paper set out the sources of land supply. The Housing Trajectory shows that the Council expects delivery rates on these sites to markedly increase over the 2019 – 2024 period[57] (1,870 homes at 374 pa).

437. To ensure a consistent supply, the Council's strategy has been to seek to allocate a raft of sustainable, relatively small to medium, highly deliverable sites on the edge of Tier 1 and Tier 2 settlements. These sites will be complimented by town centre regeneration plans and windfall sites including

[57] The year when the Local Plan is programmed to be adopted

those potentially delivered through Neighbourhood Plans in rural areas[58]. Consequently, the new housing sites are located across a range of geographical locations within the District, thus maximising the choice and competition available to the market and encouraging a range of different housebuilders to come forward.

438. Of the allocated sites identified for delivery between 2019 and 2024 the minority of these allocations will be on land currently designated as Green Belt (11 of the 33 sites). Some of these sites are also expected to begin of these five year period and carry on supplying housing within the 6-10 years period. Notwithstanding, the sites are a mixture of small, medium and large sized allocations, without significant constraints and are expected to be delivered within the short term providing a boost to housing land supply in the District.

439. In addition, the Council have identified a large strategic site; the South Godstone Garden Community to assist in meeting the housing need to be provided just beyond the middle of the plan period.

440. Consequently, as a combination of existing and proposed sites in Tandridge, the Housing Trajectory predicts that completions in the District will increase significantly from 2019 onwards until delivery of the Garden Community Development comes on line in 2026. There is one exception to this in year 2021/22 where 76 units are forecasted but the previous year is expected to provide 458, which is 155 units more than the 303dpa housing figure. The Council contends this provides a balanced and proportionate response to the need to create new short-term housing supply opportunities within the wider ambit of the optimum strategic approach to new development in the District set out in the SA.

441. It also should be recognised that the 303dpa is an annualised target and there are likely to be years when this figure is exceeded and others where it may not be quite met. However, as long as there is a consistent supply, in so far as backlog can be addressed and a 5% buffer (or 20% where persistent under delivery is identified) provided, then this approach wold be consistent with the NPPF 2012.

*Calculation – Sedgefield*

442. The following table sets out the 5-year housing supply calculation from the 2019 anticipated Local Plan adoption year. The table reflects the annualised Local Plan requirement of 303 dwellings per annum. The existing shortfall will be rectified within 5 years (i.e., Sedgefield method) and a 5% buffer has been applied.

[58] Please note no Neighbourhood Plans are included within the Housing Trajectory but could assist in future supply.

Table 12: Sedgefield 5 Year Housing Supply

| | | | |
|---|---|---|---|
| (a) | Requirement from start of plan period | 1,817 | (303*6) |
| (b) | Delivery 2013-2019 | 1,705 | Net number of homes |
| (c) | Shortfall | 112 | (a) – (b) |
| (d) | 5 year requirement + Shortfall | 1,627 | (303*5) + (c) |
| (e) | Add 5% buffer | 1,708 | (d) * 1.05 |
| (f) | Annualised average | 341 | (e) / 5 years |
| (g) | Supply within 5 years | 1,870 | See Appendix 3 |
| (h) | Land Supply | 5.48 | (g) / (f) |

443. This position represents the possible 5-year requirement and shows that, on the basis of the Plan's Housing Trajectory, a total of over 5 years of deliverable land supply can be demonstrated.

444. It is relevant to note that the application of the NPPF paragraph 47, a 5% 'buffer' is not regarded as part of the overall housing requirement but should be applied to increase choice and competition in the market and improve the chances of fulfilling the Plan's housing requirement on the ground. The five year supply also addresses the backlog of 112 units and provides a 5.48 year land supply. Furthermore, with 0.48 years over the 5 years there is flexibility to ensure a five year supply is delivered.

*Calculation – Liverpool*

445. Appeal cases APP/L1765/W/16/3141664 and APP/L1765/W/16/3141667s identify when the Liverpool approach should be used to calculate 5 year housing land supply. The Inspector appointed on behalf of the Secretary of State set out that:

*(1) The Council's Liverpool approach should be used when calculating five year housing land supply, spreading any housing delivery shortfall across the plan period rather than concentrating it into the relevant five year period. This was because the Council's housing delivery strategy embodied in the Local Plan Part 1 and the Local Plan Part 2 relied on three large strategic sites to*

*deliver around two-thirds of the overall housing requirement over the plan period. Such strategic sites tend to take longer to commence and deliver due to their relative complexities - such as those associated with getting planning permission and other development consents, land ownership issues and infrastructure delivery - compared to smaller sites, such that they are more likely to deliver later into the plan period. Consequently, the Sedgefield method was not currently appropriate in the District, whereas the Council's approach of anticipating a 'curved' rather than a 'straight-line' delivery and spreading the shortfall over the plan period was appropriate. (Paragraph [16])*

*(2) A 5% buffer should be adopted to calculating five-year housing land supply. The Council's approach to taking a longer-term view from 2001 was appropriate in order to offer a better overall perspective of delivery having regard to the potential for peaks and troughs in delivery that might be caused by factors such as market conditions. In the majority of those 15 years the 'requirement' was either met or exceeded. For those years since 2011 when the trajectory had been produced delivery should be measured against the trajectory rather than any average over the plan period. Taking an overall view of the 15-year period, there was not currently a record of persistent under delivery of housing in the terms of the Framework such that a 5% buffer only should be applied to ensure choice and competition in the market for land. (paragraphs [19], [24]-[26])*

446. Tandridge District Local Plan identifies the Garden Community, which is estimated to bring forward 1,400 units of the 6,057 within the plan period. For the same reasons as set out in the cases above, the large strategic site at the Garden Community, which provides 23% of the housing delivery, provides a curved trajectory rather than a straight line delivery and suggests that in order to ensure a consistent five year supply across the plan period, the Liverpool approach should be used.

Table 13: Liverpool five year housing supply calculation

| | | | |
|---|---|---|---|
| (a) | Requirement from start of plan period | 1,817 | (303*6) |
| (b) | Delivery 2013-2019 | 1,705 | Net number of homes |
| (c) | Shortfall | 112 | (a) – (b) |
| (d) | Shortfall spread across remaining plan period | 8 | (c) /14 |
| (e) | Shortfall to be made up in next 5 years | | (d)* 5 |
| (f) | 5 year requirement + Shortfall | 1,554 | (303*5) + (e) |

| | | | |
|---|---|---|---|
| (g) | Add 5% buffer | 1,632 | (f) * 1.05 |
| (h) | Annualised average | 326 | (g) / 5 years |
| (i) | Supply within 5 years | 1,870 | See Appendix 3 |
| (j) | Land Supply | 5.74 | (i) / (h) |

The Liverpool approach to the five year supply also addresses the backlog of 112 units and provides a 5.74 year land supply. Furthermore, with 0.74 years over the 5 years there is flexibility to ensure a five year supply is delivered.

*What are the Plan alternatives and are they realistic and sustainable?*

447. As noted above the NPPF clearly recognises that where countervailing forces exist, a balance between housing need, land availability and sustainable development needs to be achieved. In Tandridge's case consideration of the SHMA OAN target and the actual Local Plan Housing number revolves around these primary issues:

- The robustness of the evidence supporting the final Housing Target and whether every opportunity has been explored to increase the Local Plan target which is more in line with the OAN figure.
- Conformity with the 2012 NPPF policies.
- The degree of weight given to the 2018 NPPF
- The soundness of the Local Plan Spatial Strategy

448. The following section provides a summary of the main alternatives in light of the 4 points made above – and their implications. It provides a robust argument that these alternatives are not sustainable, nor are they policy compliant. However they are explored to set out the counter argument to comments relating to the Plan housing target not meeting the OAN.

*More Housing Sites in the Urban and Semi-Rural Settlements*

449. One option that has been suggested would be to allocate more housing sites in and around the Tier 1 and 2 Settlements. In practice, this would likely only relate to smaller and medium sized sites on the edge of these settlements.

450. With regards the suitability of these alternative sites as potential allocations, both the HELAA, the Local Plan SA, the landscape and ecology assessment and the Part 3 Green Belt Assessment paper have assessed the relative planning merits of these sites and the conclusion is that they are not suitable, deliverable or acceptable in terms of justifying the release of additional Green Belt. Therefore, this alternative is not more reasonable than the approach advocated in the Local Plan.

451. As explained in this paper and the NPPF, exceptional circumstances must exist for amendments to be made to Green Belt boundaries. This includes a package of measures and an assessment of acute need to determine where exceptional circumstances exist.

452. Furthermore, the principle of allocating more sites does not automatically mean they will be delivered in the plan period. There is a strong need to make improvements to the infrastructure in the District, particularly the urban and semi-rural areas where development has been focused in past plans, with little infrastructure improvement made. Consequently, the need for additional infrastructure to be provided prior to development in these settlements means in many cases that development would be beyond the plan period and therefore not help to meet need. Key examples of this are the doctor's surgeries in Lingfield, Whyteleafe and Oxted which are significantly oversubscribed.

453. On the other hand, the Council recognise that every attempt must be made to meet need and all reasonable alternatives must be explored. Therefore, an extensive and robust evidence base has been prepared, which not only looked at a range of different strategies, but also looked at a full range of sites that could be allocated to meet need. For various reasons, all other strategies (including to not build on any edge of settlement Green Belt land) and many sites were discounted based on the evidence, most importantly the SA, which demonstrates the sustainability of a plan.

454. The SA on the Issues and Approaches Paper demonstrated that approaches 2a and 2b that considered only building in urban areas put environmental considerations well above the other strands of sustainable development. In addition, the NPPF supports a number of exceptions where development may be appropriate in the Green Belt at paragraph 89 of the NPPF. The NPPF makes it clear that Green Belt boundaries should be amended through establishing exceptional circumstances in a Local Plan. The Council, through the extensive evidence base, consider that the Local Plan has allocated only sites that comply with national policy and thus it is sound.

*More Housing Sites in the Rural Areas*

455. An alternative to increasing the short to medium term supply of housing land in the District is to identify a greater level of housing in the rural areas. This alternative is Strategic Approach 4 or Approach 5 (identified in the Issues and Approaches Local Plan), which sets out delivering development around tier 3 settlements and maximum capacity in the top three tiers of the Settlement Hierarchy respectively. As a result, this alternative would entail developing sites deemed to be suitable, but not in accordance with the Local Plan's Vision and Objectives and in promoting sustainable settlements.

456. Approach 4 provided a limited amount of development to meet need and was also not considered sustainable, in that a large amount of development would be required around these settlements to make them sustainable and deliver the infrastructure improvements needed. This in turn would change the nature and character of those settlements.

457. Whilst Approach 5 (to build at every settlement in the District) was not found to be unsustainable, it is considered that this alternative would result in an imbalance between environmental harm and housing gain, resulting in a fundamental alteration to the character and nature of the District, which is predominantly rural in nature. It would generate unacceptable and rapidly accelerating pressure on infrastructure, landscape and biodiversity. In addition, this alternative would impact significantly upon the extent of the Green Belt. Furthermore, the Sustainability Appraisal acknowledges that the mitigation measures associated with Approach 5 would be challenging and, compared to the alternatives, is not the most sustainable option. It also shows that rural areas are highly sensitive to disproportionate levels of new housing.

458. It is considered that development in isolated rural areas in a non-strategic fashion would detrimentally impact upon their character leading to a higher level of development that is not well served by employment opportunities, higher level services and infrastructure provision and which cannot realistically and viably be served by non-car modes of transport. Notwithstanding, the delivery of Rural Exception Sites in these areas through the Local Plan and the production of Neighbourhood Plans is supported as long as they accord with its strategic policies.

459. Based on this, and the clear sustainability issues, the Council does not believe that it is reasonable to focus substantial levels of housing in the rural areas.

460. The other alternative was to consider the construction of a second Garden Community, although it should be noted this would only be possible at the end of the plan period. This option however was considered to be unrealistic for the following reasons.

- The risk of settlement coalescence through the development of two broad locations particularly in the South Godstone and Blindley Heath areas.
- Attention on two Garden Communities would detract from a focus on one location and thereby increase the risk in a slow-down of delivery.
- Two Garden Communities would be resource intensive not only in terms of adequate infrastructure provision, land availability and in utility capacity terms, but also in the production of two LPA led Area Action Plans.
- Infrastructure provision issues on the alternative broad locations, (i.e. waste water), cast in to doubt that they could be addressed within the plan period.
- Transport modelling demonstrated that the Tandridge road network would not be able to accommodate the additional construction traffic associated with more than one broad location.
- The broad location at Redhill Aerodrome is reliant on a junction off the M23, which, as set out in matrix at Appendix 1, has no certainty of delivery within the plan period and therefore would not offer any development potential within the plan period.

461. In July 2018, the Government published the NPPF 2018. The NPPF 2018 confirmed that the Government's standard methodology on determining local housing need should be applied to Local Plans submitted after the 24 January 2019. As the Council proposed to submit the Local Plan before that date, the standard methodology is not applicable and the NPPF 2012 is still relevant, in so far as determining the OAN figure. However, it should be noted that the Government have published a consultation on revising the standard methodology as set out in the NPPF 2018, which is to close on 7 December 2018.

462. For more information on the standard methodology and its impact on Tandridge, please see the NMSS OAN paper, November 2018.

463. Of similar noting, is the introduction of the Housing Delivery Test through the NPPF 2018, where the data was submitted to the Government in November 2018. However, the Housing Delivery Test is primarily relevant to decision making and not to plan making, as it has similar implications to the standard methodology affecting plans submitted after 24 January 2019.

*Build out rates for the Garden Community*

464. Appendix 3 identifies that the Garden Community could be built at 200 units per annum and 1,400 over the plan period. The Council has been advised that there are Garden Community developments that deliver 245 units in year 1 and a peak of 300 units per annum in later years, providing an annual delivery rate of c 270 units per annum, and this is a more appropriate figure that should be used in the housing trajectory. Appendix 4 has set out this forecasted rate out based on the Letwin review and more proactive delivery rates for large scale development.

*Summary*

465. This section shows how the Plan's strategy has been influenced by the importance of assessing the potential deliverability of new housing and the need to enable a strong and consistent source of housing sites coming forward.

466. The strategy adopted in the Plan balances the over-riding need to plan sustainably for future housing growth with the requirements of national policy to create opportunities for short term housing delivery through the application of the 5 -year housing land supply test. This is a difficult and delicate balance to strike in locations such as Tandridge District where housing requirements need to be seen against the heavily constrained nature of the District and the sustainability issues associated with a District that is rural in character.

467. The evidence associated with the Local Plan and the strategic approach around the release of Green Belt land and the level of certainty around the deliverability of the Garden Community and the associated infrastructure provision, demonstrate that the Local Plan is a deliverable one under the emerging Local Plan housing figure. The land allocations have been assessed for their deliverability through a detailed Local Plan process which

not only took into account the results of successive iterations of the HELAA, but also an extensive wider evidence base and the views of the associated developers and local communities.

468. The above shows that there is no better alternative to the approach being advocated in the emerging Local Plan. Put simply, both the OAN and NPPF 2018 figure is undeliverable under an overarching Spatial Strategy which has been tested against:

- Current NPPF policies.
- A SA process.
- An Infrastructure led approach.
- Place shaping principles which respect existing local densities and the characters of the existing settlements.
- The desire to promote sustainable travel modes and economic growth.
- The statutory need to balance the integrity of the Green Belt whilst releasing appropriate land under exceptional circumstances.

469. It should also be recognised that the Council will monitor housing completions on a yearly basis. If this data shows that completions are consistently falling below the target, then the NPPF requires a number of actions to be followed. This is further emphasised through the Housing Delivery Test that comes into force in November 2018 and will be an annual requirement to report against. In addition, five year reviews of Plans are required. The Council fully endorse that it is far better to deal with such strategic issues in a plan-led way, something which the NPPF and the Government through the NPPF 2018 clearly envisage.

470. Based on this, the approach to delivery of housing set out in the emerging Local Plan 2033 is considered sound.

# 7 Approach to Affordable Housing

471. The Council's overall affordable housing policy seeks to balance the requirement for affordable housing with the potential for it to be delivered. Under this principle the Local Plan has adopted an affordable housing planning policy approach which aims to target affordable provision in terms of its scale, mix and tenures, where it is most needed in the District.

472. The Council's SHMA establishes that there is a significant need for affordable housing but critically it indicates that the full requirement is unlikely to be delivered on the ground, mainly due to the market's inability to deliver it. This conclusion is supported by the Local Plan evidence base which assesses the District's land availability in terms of its constraints, but critically also through viability testing. The policy requirements have therefore been set at a level which is considered deliverable in terms of viability, when tested alongside the other policies in the Local Plan.

473. The Council's viability evidence has comprehensively tested the potential viability of different amounts and tenure splits for affordable housing provision across the District. The viability evidence demonstrates significant variation in the viability of residential development across the District, which is mainly due to variations in existing land use and sales values. As a result, the Local Plan sets out affordable housing polices around the required percentage of affordable housing contribution in these locations.

474. The Local Plan sets the strategic affordable housing polices with regards to the proportion of affordable housing required on each new housing site. The details of the affordable housing tenure split, its typology and dwelling size will be set out in the Council's Housing Strategy. As the Housing Strategy is a live document it can respond more flexibly at any given time to need and changes in housing market conditions. It is envisaged that the South Godstone AAP will contain more discreet and detailed localised affordable housing policies.

475. The GVA Viability Assessment on the Garden Community (December 2018) identifies that up to 40% affordable housing could be accommodated at this location. This would support the Council's commitment to ensure that 1,000 units at the Garden Community should be delivered with nomination rights for the Council[59].

476. It is acknowledged that to meet the whole affordable housing requirement indicated in the SHMA would require either much higher affordable proportions on development sites than is set out in the Local Plan, which

[59] July 2018 Planning Policy Committee minutes

would be unviable, or there would have to be significantly higher amounts of development which would be unsustainable and undeliverable in practice.

Uplift to the Overall Requirement To Improve Affordability

477. The Planning Practice Guidance recommends that there is a case for adjusting levels of housing provision upwards, in effect to improve affordability over the longer-term. However, the uplift should not increase the OAN figure or indeed, in Tandridge's case, should not influence the adjusted sustainable housing target number, to figures which the planning authority has little or no prospect of delivering in practice.

478. The SHMA identified an affordable housing need for 330 dwellings per annum (2013-33[60]). Based on current affordable housing policy this would require an overall delivery of 6,600 dwellings over the plan period to deliver the required level of affordable housing in full. The affordable need represents 109% of the deliverable Local Plan housing target over the 2013-33 period and 83% of the SHMA 2018 OAN figure.

479. The appropriate approach to addressing affordable housing within the OAN has been considered in the courts, in Kings Lynn & West Norfolk BC v Elm Park Holdings [2015]. This sets out that:

> "*The Framework makes clear these [affordable housing] needs should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed....*

480. This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the OAN. On whether they should be an influence increasing the derived OAN (since they are significant factors in providing for housing needs within an area):

> *Insofar as Hickinbottom J in the case of Oadby and Wigston District Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG..."*

481. The Inspector examining Canterbury City Council Local Plan (June 2017), in similar circumstances, found that:

[60] When taking the 391dpa in the first 5 years and 310dpa in the following 15 years.

*Following the approach set out in the PPG, the HNR* [Housing Need Review] *identified a range of affordable housing needs of between 490 and 740 dpa. To deliver this based on the proportion of affordable housing (30%) sought in the Plan would require between 1,623 and 2,467 dpa, an amount far in excess of the overall needs identified in the HNR. There is no persuasive evidence that the housing market would support this scale of building throughout the plan period. I consider that simply increasing housing provision in the Plan to these levels would not be an effective way of addressing affordable needs.*

482. Likewise, the Council considers that there is no realistic prospect of the necessary scale of growth in housing stock in the District that would enable the identified affordable needs to be met in full being achievable across the Plan period.

483. The Council and its consultants have given careful consideration to the affordable housing needs evidence. As the 2018 SHMA indicates, to meet the affordable housing need in full would require 391 affordable units pa growth in the housing stock over the first five years and then once the backlog is cleared, 310 affordable units per annum would be required, which is essentially above what any rural area nationally has consistently delivered recently[61].

484. As the analysis in Sections 2 and 4 of this Paper set out, to deliver the overall Plan target figure of 6,057 dwellings requires an average 0.7% per annum growth in the housing stock to be sustained to 2033. This is considered to be the upper limit of what can be considered achievable in a district with Tandridge's constraints.

485. Likewise, with the Canterbury case; if 310-391 affordable units were provided at a percentage of between 20-40% (dependent on the settlement), then a total requirement of housing would be 775-1,955 dpa. Similar to the Canterbury case this would be far in excess of the overall housing need, not deliverable and not an effective way to deliver affordable housing. In addition, this is more than housing targets in most of country apart from major cities and London Boroughs.

486. Furthermore, as an example; if the Plan was to provide 708 dpa (398 market homes - SHMA 2018 OAN with market signals uplift - and 310 affordable homes), then this equates to well over 40% affordable housing provision. When tested through viability, some sites were unviable at 20% affordable housing and some at 40% affordable housing. The sites that were unviable at 20% have been given carefully consideration and policy amendments have been made to provide commuted sums where it can be demonstrated that the affordable housing provision makes a site unviable.

[61] Table 1011, https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply

# 8 Gypsy and Traveller Accommodation

487. This section covers the Local Plan's approach to the provision of Gypsy and Traveller sites within the District.

488. Planning Policy for Traveller Sites (PPTS), as most recently amended in August 2015, sets out the Government's policies and expectations in relation to planning for the needs of Gypsies, Travellers and Travelling Showpeople (collectively termed as 'travellers' in the remainder of this Section).

489. The PPTS is clear that local planning authorities should identify accommodation need for travellers and set pitch and plot targets[62] in Local Plans and identify sites to meet such targets.

490. Tandridge's original need for traveller sites was assessed in the Traveller Accommodation Assessment (TAA), undertaken in 2013. It identified a need for 63 pitches and 26 plots between 2013 and 2028.

491. The Council recognised that the changes to the PPTS had an impact upon the way in which needs are calculated including the key removal of the term when assessing need of persons...who have ceased to travel permanently and commissioned a new TAA to inform the Local Plan. The new Gypsy and Traveller Accommodation Assessment (GTAA) was published in 2017 and found a current and future need of 5 pitches and 21 plots between 2016 and 2033.

492. The Local Plan takes into account the conclusions of the GTAA 2017 and any subsequent updates, among other factors, when setting targets for pitches and plots.

493. In order to address needs the Council took a proactive approach to identifying sites for assessment through the HELAA process and primarily used two sources; sites submitted as part of a call for sites and sites where there is a current planning applications.

494. From the point of view of assessing the suitability of sites, it is relevant to note that whilst it is important that traveller sites are situated in locations that allow for access to services and infrastructure provision, it is generally accepted that travellers reside in relatively remote locations. Therefore, if a site is in existing use for travellers, or is adjacent to a site in existing use for travellers, but is not adjacent to a sustainable settlement, then the Council has considered the site to be suitable, from a locational perspective.

[62] Gypsy accommodation is known as pitches and plots with storage areas are accommodation for Travelling Showpeople.

495. This approach is supported by para 13 of the PPTS that requires that LPAs should ensure that traveller sites are sustainable economically, socially and environmentally and subsection (h) which states that Local Plan policies should

*Reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.*

496. In accordance with the PPTS, The Local Plan approach to traveller site allocation is cognisant of the particular social circumstances that affect a traveller allocation, and which contribute to the definition of sustainability in its wider sense. When assessing the sustainability of these sites and the social and economic lifestyle of travellers it is only correct that these circumstances affect the locational assessment of a potential site, and this has been reflected in the criteria based traveller policy in the Local Plan.

497. Whilst the Local Plan's Spatial Strategy does not identify a preferred location for traveller development at this point, it is seeking to accommodate development needs on Green Belt sites where exceptional circumstances can be demonstrated and where it accords with national policy requirements (see HELAA section). It is also envisaged that the Garden Community Development will also accommodate some of this need, but this will be determined through the forthcoming AAP and associated masterplanning exercises.

498. There are also two recent live planning applications that, subject to Planning Committee approval, comply with the PPTS and the emerging policy and would meet the 5 gypsy pitches that are required.

# 9 Conclusion

499. It is considered that the emerging Local Plan, attendant Spatial Strategy and housing target all respond to the different policy context and have adopted an approach towards housing delivery which is more nuanced and more robust. This responds to the change in the planning system reflected in the 2012 NPPF and its emphasis on good place making principles and the new requirement to deliver a housing target that reflects updated evidence around demographics, population movements, market values, affordability and the needs existing communities. The Plan addresses the negatives associated with speculative development by emphasising the golden thread of the NPPF; which is sustainable development. It has been based on a bottom up assessment of housing need, whilst being influenced by what is realistically achievable and deliverable in local circumstances taking account of evidence from developers and housebuilders.

500. The Local Plan does not rely on a uniform scale of proposal to deliver its housing target. Instead, it relies on a variety of sizes of sites and schemes across the District, catering to a variety of local markets. The Local Plan also recognises what is happening in the market at this point, responding to a genuine interest in bringing forward several key brownfield sites such as the Oxted Gas Holder and Church Walk in and around the Tier 1 settlements. In this context, the strategy is clearly delivery focused.

501. This approach is reflected in the Local Plan's Spatial Strategy. This Strategy directs housing delivery towards Tandridge's Urban and Semi-Rural areas, both within and on the edges of those settlements, as well as the creation of a new Garden Community. It is based on a robust evidence base, which has considered every site and discounted some of them for a variety of important reasons.

502. The Local Plan can also demonstrate a five year land supply that addresses backlog and provides for a 5% buffer to ensure choice and competition in the market.

# Appendices

*Appendix 1 Garden Community Matrix Updated*

| | Strategic Position | Availability | Environmental Considerations | | | | Agricultural land grade | Water related constraints |
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| **Settlement** | | | Landscape | Ecology | Heritage | Air Quality | | Sewerage Treatment Works |
| **Blindley Heath** | The Blindley Heath broad location is centrally located in the District. The area is located on the A22, which is a main arterial road that connects London with the Coast. In terms of its strategic benefit it has the opportunity to provide jobs and homes in a prosperous economic area which is on the edge of the Gatwick Diamond. There is limited employment provision within or on the edge of the existing settlement, but the area is in proximity to the key employment areas of Gatwick Airport, Crawley and Redhill each of which are within reasonable travelling distance. Access to these employment areas is cross country either via rural roads or via the A264 at Felbridge towards Crawley, or by travelling north on the A22 to Caterham, the A25 for Redhill and wider areas from j6 of the M25. Redhill can also be accessed via direct train from nearby Godstone Station at South Godstone which residents can travel to via car or public transport. Its location within the district means that any development in this location would predominantly serve current and future residents in the first instance. | The land to the west of the A22 is predominantly in single ownership and has been secured by the developers with the potential to deliver around 1,800 - 2,200 homes. Land to the east has also been promoted by the developer and whilst further information has been provided by the developer since March 2018, the Council have no evidence to demonstrate that a number of landowners to the east have changed their mind and consequently they are still opposed to selling their land for development and have rejected offers which not only depletes the certainty of delivery, but also reduces the amount of development that could take place thus potentially preventing it from achieving the critical mass needed to generate and fund infrastructure for the wider benefit. Whilst landowners could change their minds about development at a later date, or the Council could investigate purchasing the land either via the market or through compulsory purchase to bring it forward, there would need to be an overwhelming reason to pursue this course of action. | The high ground to the north and north-west, together with the substantial blocks of woodland on the south facing slopes, provide a substantial and robust landscape feature which could form the basis of a new settlement boundary for future development. The land form also provides physical and visual separation to Anglefield Corner. There are no landscape designations such as AONB on the central landscape character area. It is well contained in the wider landscape by high ground to the north and woodland and an established hedgerow network to the west and south. The relatively intact internal landscape structure to the central area could form a basis for the structuring of land parcels for residential and open space land uses. Further expansion in the longer term would be inappropriate in the surrounding landscape to the west and south due to flood plain limitations and the scale and sensitivity of the local landscape. Land to the north is elevated and exposed and not appropriate for development in the context of the settlement pattern of Blindley Heath and its wider setting. Limited expansion to the east, beyond the A22 and as far east as Tandridge Lane could be accommodated without undue visual impact on the wider landscape. | Blindley Heath SSSI is located south east of this broad location. Potential land for development lies within the Impact Risk Zone for the SSSI and Natural England are a statutory consultee and will continue to be consulted on any proposals for a new garden community. Their anticipated concerns would be to protect the SSSI from adverse effects arising from increased recreational activity, and possible hydrological or air quality changes arising from construction and increased traffic. The majority of the potential location consists of arable and pasture grasslands, separated by a strong network of hedges, linked to ancient woodlands, notably Blue Anchor Wood SNCI, Byers Wood potential SNCI and, further north, Hangdog Wood potential SNCI. These woodland and hedgerow interests would require creation of buffer zones and sensitive residential design to maximise retention of hedgerows and replacement of their network value (in areas where loss is inevitable). There are few records of protected species within this potential location, but great crested newts are recorded in the wider landscape, and bat roost records exist for the built-up areas of Blindley Heath. There is a possibility that dormice are present in the areas of ancient woodland. The Ray Brook is shown as a Surrey Biodiversity Opportunity Area (BOA). It is also connected to Blindley Heath SSSI and Local Nature Reserve (LNR). Within the potential location, this BOA has currently relatively low ecological value but could form the green infrastructure for the new garden community, including creation of wetland and woodland habitats, allowing for recreational opportunities to a) minimise the need/desire to access Blindley Heath SSSI, and b) alongside the nearby Local Nature Reserve (LNR). | There are no Conservation Areas within this broad location. Part of the location is an Area of High Archaeological Potential. There are also a number of listed buildings within and surrounding the area, and areas of Ancient Woodland to the north west, and to the south. The setting of the heritage assets would need careful consideration in any design and the extent of land necessary for development would need to be appropriate having regard to any heritage constraints. | All garden community developments were found to be acceptable in air quality terms although Blindley Heath was found to have the least impact. If allocated, it was recommended that impacts along the A22 Anglefield Corner, whilst not considered significant, should be monitored. | Majority of land is grade 3 agricultural with a small parcel of land to the south and north east of the area that is non-agricultural. | There is a sewerage treatment works located on Crowhurst Lane in Lingfield approximately 2,500 meters to the south east of central Blindley Heath. In relation to a garden community option, Thames Water recommends that a mini Integrated Water Management Strategy (IWMS) is produced to support the development promotion and this should be specifically referred to in a policy. Southern Water have identified that it is likely that investment will be required to provide additional capacity in this location, both in strategic infrastructure such as wastewater treatment works (WwTWs) and local infrastructure such as the sewerage system, (i.e. the system of pipes and pumping stations that convey wastewater from homes to the WTW for treatment) It has been confirmed that Lingfield WwTW has the capacity to accept planned growth up to AMP10 (2035-2040). Although delivery of the network reinforcement will be required and need to be aligned with the occupation of development. |
| | + | - | - | - | 0 | 0 | 0 | 0 |
| **South Godstone** | The South Godstone broad location is centrally located in the | The South Godstone broad location surrounds the existing settlement to | A substantial area of land is contained by the railway and high ground to the south of the | There are no SSSIs within the broad location or within 1km of the location. North of South Godstone, the area | The buildings, moat and historic | All garden community developments | Grade 3 agricultural land in the northern half of the area, with | A sewerage treatment works is located on Bone Mill Lane, which is approximately 1,500 metres north and another is located |

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| | District. The area is located on the A22, which is a main arterial road that connects London with the Coast. In terms of its strategic benefit it has the opportunity to provide jobs and homes in a prosperous economic area which is on the edge of the Gatwick Diamond. The area is in proximity to the key employment areas of Gatwick Airport, Crawley and Redhill each of which are within reasonable travelling distance. Access to these employment areas is cross country either via rural roads or via the A264 at Febridge towards Crawley, or by travelling north on the A22 to Caterham, the A25 for Redhill and wider areas from j6 of the M25. Redhill can also be accessed via direct train from Godstone Station located within the existing settlement and connecting trains to London, Guildford and Croydon can also be accessed at Redhill. The broad location is in close proximity to Lambs Business Park on Tilburstow Hill Road just off the A22, which is a strategic employment site for the district. Its location within the district means that any development in this location would predominantly serve current and future residents in the first instance. | the north and south with two distinct promotional interests: land to the north of the railway and land to the south of the railway. The northern section is secured by one promoter who has legal agreements with landowners in place already. The Council recognise there is a small uncertainty regarding availability of land in the southern area, however, this is mainly due to a parcel of land which was subdivided into over 300 plots and auctioned for development. There are a number of these plot owners who have been in contact with the Council and would be happy to sell their parcel of land for development. For the remainder, whilst many live overseas, there purchased the land with the prospect of development and therefore the Council understand that this land is available for development. In addition, since March 2018, the Council have checked the legal agreements provided by the single promoter in the South and understand that the land is available for development. If there were any parcels found to be without option but needed to facilitate development, the Council could investigate purchasing the land or compulsory purchasing the land to bring it forward. Although compulsory purchase should be considered as a last resort. There is now also evidence of a few housebuilders who are interested in developing the site and with an identified allocation within a Plan this will only be progressed further. | existing community. This, together with the large block of woodland on its south facing slopes, could provide a substantial and robust landscape feature which could form the basis of an extension boundary for future development. This area could provide a potential smaller settlement extension contained by well-defined landscape boundaries, subject to constraints being dealt with satisfactorily. However, the land to the north is open and exposed, and forms the setting to the community, as such it is considered sensitive. Development should incorporate mitigation through careful design including planting strategies. Land for open space could be accommodated in a variety of locations to enhance existing features, such as Park Pale to the north of the railway and to the southwest of Lagham Manor. Key characteristics of the landscape should be maintained where possible. | lies within the outer extent of the Impact Risk Zone for Godstone Ponds SSSI, so Natural England will require to be consulted on road proposals. Land, including south of the train line lies at the outer edges of the Godstone Ponds and Blindley Heath SSSI Impact Risk Zones. There is one SNCI, Cloverhouse Meadows, within the broad location and is south of Lagham Manor and is an area of grassland close to a brook and to pockets of ancient woodland. There is also one potential SNCI, Bradford Wood, which is a large pocket of ancient woodland. Collectively this cluster of grasslands and woodlands is of high local value. The broad location includes a watercourse which has been broadened into a set of artificial ponds at Oakhurst Place and a wooded corridor. There are pockets of ancient woodland throughout this broad location which will require protection. In respect of protected species, there are few records arising from the desktop study, although there are records of great crested newts outside South Godstone and dormouse in the ancient woodlands and records of bat roosts in the built-up area of South Godstone. There is a Biodiversity Opportunity Area following the watercourse corridor. Development offers an opportunity to create a green infrastructure corridor and increase linkages between the meadows and ancient woodlands, particularly around Cloverhouse Meadows. Broadening and enhancing the ancient woodland corridor and increasing wildlife linkages could be achieved. | connections with the surrounding land need to be factored into any development, as does the wider setting and the context of the Park Pale and the historic deer park. There are no Conservation Areas within this broad location but part of it is an Area of High Archaeological Potential. There are also a number of listed buildings within and surrounding the area as well as pockets of ancient woodland. The setting of these assets would need detailed consideration in any design and the extent of land necessary for development would need to be appropriate having regard to any heritage constraints. | were found to be acceptable in air quality terms. For South Godstone, it was recommended that should it be allocated that impacts around the A22 Eastbourne Road in South Godstone, particularly near the railway station, whilst not considered significant, should be monitored. Monitoring may also be considered near Lusted Hall Lane, just south of Biggin Hill. | the majority of land to the south grade 3 agricultural apart from a swath of land to the south west of the area that is non-agricultural. | over 3,000 metres to the east from the centre of South Godstone. In relation to garden community option Thames Water recommends that a mini Integrated Water Management Strategy (IWMS) is produced to support the development promotion and this should be specifically referred to in the Policy. Southern Water have indicated that Lingfield WwTW has the capacity to accept planned growth up to AMP10 (2035-2040). However, the South Godstone Garden Community should be served by the Bough Beech WTW, which would have capacity to serve the forecast growth. Investment will be required to provide extensive reinforcement to build a new strategic connection to the trunk main at Blindley Heath. This will require a new main between 1.5 and 2km long. If taken forward, and likely to commence construction in 2026, this would allow time for this work to be completed but is reliant on the developers engaging with SESW at the earliest opportunity. Delivery of the network reinforcements will need to be aligned with the occupation of development. |
| | ++ | + | - | - | 0 | 0 | 0 | 0 |
| **Redhill** | The Redhill Aerodrome broad location is | Large swathes of the land relating to the Redhill | Redhill Aerodrome, which lies at the core of the broad | There are no SSSI's within the broad location on the Tandridge side, yet | There are no Conservation | All garden community | Majority of the land is non-agricultural with | There are two wastewater treatment works within proximity of the broad |

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| **Aerodrome** | located on the western edge of the district near South Nutfield. The broad location crosses administrative boarders into Reigate and Banstead. The area is located west of the M23 which is a major strategic road network and runs between London and Brighton via Gatwick Airport. However, there is no direct access to the M23 or any other strategic roads such as the A23 to the west or A25 to the north. Travel to and from this site would currently be reliant on rural roads. East Surrey Hospital sits on the far western edge of the broad location within Reigate and Banstead where the A23 also runs. This location is well located to the economic centre of the Gatwick Diamond and key employment areas of Gatwick, Crawley and more closely Redhill and Reigate are in easy commuting distance. Nutfield, Earlswood,and Redhill train stations are all in proximity to the broad location giving access to London, Guildford, Brighton, Corydon and elsewhere, none are located within the broad location and would need to be accessed via car or public transport. Given the location it is logical to assume that most benefits of development i.e. new infrastructure would be to the west and for residents and businesses of Reigate and Banstead and Crawley. | Aerodrome broad location are in a number of single ownerships. These landowners have entered in to legal agreements to dispose of their land to the potential development. An All Party Parliament Group on Aviation is considering the need to resist loss of light aircraft aerodromes which could be relevant to the consideration of Redhill Aerodrome. However, this is in early stages and ultimately it is up to the landowner to consider how they want their land to be used. The location has one main promoter and 'buy-in' from at least two housebuilders. Access to the land is reliant on a new junction and link road off the M23, but to date, no certainty of delivery of the junction has been demonstrated. Promoters have indicated that a small number of units could be brought forward on the south east corner within Tandridge, but officers would recommend against this due to its need rely on the rural road network and the potential risk this would have to a wider comprehensive scheme. | location, is maintained as open grassland and utilises a grass-runway; it has no landscape designations and few landscape features of high landscape value. It lacks internal landscape structure but is locally well-contained by a minor ridge to the west and north-west which separates the airfield from the urban areas of Redhill further to the west. A mature framework of hedgerows, tree lines and the M23 corridor provide wider containment to the east and south. More locally the riparian vegetation of the Redhill Brook and Salford's Stream floodplains add containment to the area, although the eastern and western airfield boundaries adjacent to the runway alignments are limited and offer open views across the aerodrome and beyond, from adjacent roads. Development here could affect the rural setting of neighbouring settlements, particularly South Nutfield. There is inter-visibility between land adjoining South Nutfield and the aerodrome. A high degree of rural/urban interface also exists between the edge of Redhill, Whitebushes and Earlswood, compounded by proximity to the transport corridors of the railway and motorway. These characteristics essentially interrupt the landscape characteristics and result in a low sensitivity to change, although the level of sensitivity rises around the managed wildlife sites. There is potential for impacts on the setting of the candidate AONB to the north and to views from the Greensand Way, as well as limitations associated with the flood plain and the M23 to the east which would need to be recognised in design. | the northern half of the potential location lies within the outer radius of the SSSI Impact Risk Zone for Mole Gap to Reigate Escarpment SSSI, and Natural England would require consultation on major new housing and infrastructure schemes. It is anticipated that their primary concern would be the indirect effects of recreational disturbance on the SSSI. There is one SNCI within the potential location, Furzefield Wood and a few small pockets of ancient woodland. Whilst the aerodrome grassland and the arable land is sub-optimal habitat for amphibians due to the lack of wetlands and the intensive management regimes, the semi-improved pasture and hedges will provide shelter and foraging habitat. There are also several records of great crested newts within and around the area. The potential location offers two principal opportunities for ecological enhancement. 1) It is identified as a Biodiversity Opportunity Area and it could become a broad green infrastructure corridor with a diversity of new habitats, including re-naturalisation of the floodplain. This would also give opportunities for public recreation in close contact with the natural environment. 2) The cessation of aerodrome activity would enable more opportunities for woodland planting and pond creation within the framework of a garden community. New woodland and wetlands created within a garden community framework would enhance the populations of amphibians and birds. | Areas or Areas of High Archaeological Potential within this broad location. However, there are a number of listed buildings within and surrounding the area and some pockets of ancient woodland. The setting of these assets would need detailed consideration in any design and the extent of land necessary for development would need to be appropriate having regard to any heritage constraints. | developments were found to be acceptable in air quality terms. For Redhill Aerodrome, the routing of the proposed M23 access road would need to be carefully considered for its impact on existing residents. It should also be noted that this scenario will inevitably also affect residents of Reigate and Banstead, which were not explored further in the air quality assessment. | some small swaths of grade 3 agricultural to the eastern half of the area. | location, one in the Earlswood/Whitebushes area, another adjacent to the M23 on Crab Hill Lane near South Nutfield. Reigate WwTW is currently close to its permit. Much of the growth in this catchment is from outside Tandridge and is likely to be accommodated through a planned capacity upgrade. Should the Redhill Aerodrome garden village site be taken forward, a further upgrade will be required to the WwTW at a potential cost of £20M. Clarity is therefore required at an early stage to avoid sunk cost in Thames Water's upgrade plans.<br>The scale of development/s is likely to require upgrades to the wastewater network and therefore the Developer and the Local Planning Authority will need to liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. |
| | ++ | + | - | - | - | 0 | 0 | -/+ |

| | Water related constraints | Accessibility | Impact on existing | Employment | Sustainability Appraisal | Conclusion |
|---|---|---|---|---|---|---|

| Settlement | Flood Risk | Road Network | Public Transport | Rail Services | communities (including community benefit) | | | |
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| **Blindley Heath** | The Ray Brook, a tributary of the River Eden, runs in a broadly easterly direction across the potential location, before meeting the Eden Brook. Due to the presence of watercourses, some land within the broad location, particularly to the south, is within Flood Zones 2 and 3a (medium and high risk), with an area of Flood Zone 3b (functional flood plain) located between the A22 and B2029. Climate change has the potential to increase the extent of Flood Zone 3a. Blindley Heath is also at risk of surface water flooding. However, the potential location is predominantly within Flood Zone 1 (low risk) and its development would need to be designed using a sequential approach, with built development primarily located in Flood Zone 1. It would need to include detailed modelling to confirm flood zone and climate change extents and must address all sources of flooding, seeking opportunities to reduce overall levels of flood risk on-site, and ensure it does not exacerbate flooding downstream. However, whilst flood risk is a significant planning consideration, the existence of a watercourse within a potential development area provides considerable opportunities for landscape features, habitats and biodiversity. It also provides a potential recreational feature in terms of leisure and physical activity. It has been identified the Garden Community could create surface runoff and the impact on the SSSI in this location could be significantly affected, as well as adversely impacting the flora and fauna. Whilst development proposals would include Sustainable Urban Drainage systems, there would also need to be appropriate management of runoff to limit pollution and potentially improve the situation relative to rural runoff. | The broad location is centrally located in the District and is directly adjacent to the A22 which is the main highways access point to the existing settlement which segregates the current built form. The Blindley Heath Garden Village has the least number of trips in the AM hour and the least impact on congestion for this time hour and the PM hour, as its additional traffic is dispersed by the time it joins more congested roads. Although the strategic transport modelling identifies that the Blindley Heath garden community is the smallest of the three potential garden villages and would therefore be expected to have the least impact. In the weekday AM peak period there are increases on the A22 Eastbourne Road, B2029 Ray Lane and the A25 between Godstone and Limpsfield. During the weekday PM peak period impacts are broadly similar but with further increases on the B2028 West Park Road and Approach Road in Tatsfield. In addition, it has been recognised that most junctions along the A22, including the Felbridge junction and junction 6 of the M25 would need improvements. | Existing bus services for Blindley Heath that traverse the A22 are relatively frequent, however, connections to and from more rural areas are limited. There is no train station located at Blindley Heath. The closest rail connection is via Godstone Station at South Godstone, or Lingfield both of which would need to be accessed via road. The promoters of the location have identified that frequent bus services would be subsidised initially and be provided as part of the development with a potential 'pocket park and ride' bus service to other rail stations. Pedestrian and cycle links would also be provided, Green and blue infrastructure corridors would be expected in any of the garden community locations. | There is no train station located at Blindley Heath. The closest rail connection is via Godstone Station at South Godstone, or Lingfield. The promoters of the location have identified that frequent bus services would be subsidised initially and provided as part of the development with a potential 'pocket park and ride' bus service to other rail stations. Network rail do not identify capacity issues on the Tonbridge to Redhill line which is relevant to Godstone Station but do highlight capacity as an issue on the Uckfield to London line affecting Lingfield services. Whilst there is no station located at Blindley Heath, it does not mean that the development would not be required to fund improvements to either station. | As the development would be adjacent to the existing settlement of Blindley Heath, the character of Blindley Heath would be altered. Blindley Heath currently has very limited service provision with a petrol station and associated shop as the main source for convenience goods. Development in this location would increase the community's access to services and provide new schools, improvements to the road network and public transport links, improved health facilities, accessible and good quality recreational space, more retail and leisure opportunities as well as more employment. Due to its central location in the District it would benefit existing residents in the area directly; it would take pressure off existing services and facilities like schools in the surrounding settlements that are already near capacity and make Blindley Heath a sustainable community. | Systems House is located in Blindley Heath (off the A22) and is a 1.2 ha employment site that the Tandridge Economic Needs Assessment (2015 and 2017) recommends should continue to be protected for B1 uses. This potential location could therefore provide some employment opportunities for future residents of a garden community. The garden community will be required to provide employment floorspace (B1-B8 uses) in addition to other forms of employment. The garden community will be required to provide a community hub, which is likely to include leisure and retail. As such, additional jobs will also be provided. The Economic Needs Assessment 2017 ranks Blindley Heath as the poorest commercial location based on its proximity to rail and strategic road network in comparison to the other garden community broad locations. | The SA is a comparison of the Garden Community options. The Blindley Heath option performs relatively poor when assessed against economic objectives.<br>This option seems likely to provide less housing, thereby reducing scope for new services to serve the wider District. The adverse impact on the SSSI could be significantly adversely affected and also a concern for the deliverability of development within this broad location. This location has scope to address pre-existing issues within the District: Secondary schools are located towards the periphery of the district. Consequently, those sites in more central locations in the district, such as South Godstone and Blindley Heath, have journey distances of over 6km to the closest secondary school; Access to facilities and amenities, such as convenience stores and / or supermarkets, is limited for the villages in the central area of Tandridge.<br>There is a lack of access to strategic scale accessible natural greenspace, particularly in the South of the District, which could be provided through this option. Within the Blindley Heath broad location itself, the western side of the A22 appears to be less constrained and preferable to the land east of the A22 in sustainability terms. | Since March 2018, there has been constant information from the developer ensuring the availability of land within the Blindley Heath broad location. However, the Council are still aware that landowners of large parcels of land in the eastern half of the area do want their land considered for development. Whilst there are other methods the Council could use in bringing land forward, most of these should be considered as a last resort. If only the western side could come forward, it is not significant enough to bring forward the infrastructure required to meet the Councils aims, priorities and objectives of the garden community. The reliance on public transport, particularly train stations, which are a considerable distance away from the site and connected by rural roads, is not the most sustainable of approaches. The area is currently linear along the A22 and expansion of this area provides limited containment.<br>There could also be a significant impact on the SSSI from the run off from the garden community. |
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|---|---|---|---|---|---|---|---|---|
| **South Godstone** | The Gibbs Brook flows towards the south-east where it joins the River Eden, whilst the Country Stream is located in the south-east and joins the River Eden further downstream; an un-named ordinary watercourse flows through the south-west of the area, joining Ray Brook. The broad location is primarily within Flood Zone 1 (low risk). Flood Zones 2 and 3a (medium and high risk) also occur within the location along Eastbourne Road with additional areas of flood risk to the east of Tandridge Lane. Climate change has the potential to increase the extent of flood zone 3a. The location contains areas of surface water flooding, and whilst the majority of the area is at negligible risk of groundwater flooding, there are areas to the north and south where there is a risk of groundwater flooding to surface and subsurface assets, but there is no identified risk of groundwater flooding. Gibbs Brook (east of Tandridge Lane) is at risk of reservoir flooding from Bough Beech and Wilderness Lake. However, the potential location is predominantly within Flood Zone 1 (low risk) and its development would need to be designed using a sequential approach, with built development primarily located in Flood Zone 1. It would need to include detailed modelling to confirm flood zone and climate change extents and must address all sources of flooding, seeking opportunities to reduce overall levels of flood risk on-site, and ensure it does not exacerbate flooding downstream. However, whilst flood risk is a significant planning consideration, the existence of a watercourse within a potential development area provides considerable opportunities for landscape features, habitats and biodiversity. It also provides a potential recreational feature in terms of leisure and physical activity. Whilst development proposals would include Sustainable Urban Drainage systems, there would also need to be appropriate management of runoff to limit pollution and potentially improve the situation relative to rural runoff. | The broad location is centrally located in the District and is directly adjacent to the A22 which is the main highways access point to the existing settlement which segregates the current built form. South Godstone garden community provides an intermediate case with differing impacts in the AM and PM hours. In both the weekday AM and PM peak hours there are increases on the A22 Eastbourne Road, Tilburstow Hill Road, Tandridge Lane, B2029 Ray Lane and then the B2028 West Park Road in just the PM peak hour. In the AM peak hour there is changeable routeing in the north-east with increases on Lusted Hall Lane, B2024 Clarks Lane and Rag Hill Road. In addition, it has been recognised that most junctions along the A22, including the Felbridge junction and junction 6 of the M25 would need improvements. | Existing bus services for South Godstone that traverse the A22 are relatively frequent, however, connections to and from more rural areas are limited. The promoters of the location have identified that frequent and more extensive bus services would be subsidised initially and would be provided as part of the development. Godstone Station is located in South Godstone, with services between Tonbridge and Redhill. Improvements to the train station would be a requirement of a garden community development at this location and pedestrian and cycle links would also need to be provided. Whilst it is understood that there is a need to connect at Redhill to London Bridge, which could add extra time to people's journey and therefore residents could chose to park and then use another train station, this is a consumer choice and a behaviour, it does not mean that the location of a train station in this location is not sustainable or affects the delivery of the garden community. Although should it be allocated, upgrades to the capacity and service at this station would be expected. | Godstone station is located in South Godstone. Whilst the direct service to London will shortly be removed, discussions with Network Rail identify that improvements to this line and its service is possible with development in this location including the need for mobility impaired access, possibly longer platforms, a new ticket hall, parking improvements and potential regeneration of the station. Network rail suggest that there is capacity on the Tonbridge to Redhill line. | As the development would be adjacent to the existing settlement of South Godstone, the character of South Godstone would be altered. The proximity of the broad location to Tandridge settlement is a consideration and any development would need to mitigate potential impacts to the rural roads, such as Tandridge Lane to prevent it from being used as a rat-run. Proximity to nearby settlements would be an important factor in determining the extent and design of a garden community. South Godstone currently has some service provision with a primary school and a train station and these would be upscaled and benefitted by development. Godstone train station has already seen a change in the train operations to London and this is due, in part, to the limited use of this service but there is capacity on the line. Our discussions with Network Rail have identified that the train service could be improved with a garden community development is this location. Development at this location would provide new schools, improvements to the road network and public transport links, improved health facilities, accessible and good quality recreational space, more retail and leisure opportunities as well as more employment. Due to its central location in the District it would benefit more existing residents in the area; it would take pressure off existing services and facilities like schools that are already near capacity. | The Lambs Business Park is located to the West of South Godstone Village and is currently designated as a Strategic Employment Site in the Tandridge District Core Strategy (2008-2026). The retention of this site as a strategic employment site is supported through the Tandridge Economic Needs Assessment (2015 and 2017) and the willingness of the landowner of Lambs has shown commitment to the retention and expansion of the land for employment uses for the future. The Council's Economic Proposition also shows support for Lambs Business Park as an employment site that could become a data centre and technology park and including its current operations could provide local job opportunities, as well as the Surrey Waste Plan allocation, which could be utilised as a renewable energy source. The potential garden community will be required to provide employment floorspace (B1-B8 uses) in addition to other forms of employment, some of which could be accommodated at Business Park. The garden community would be required to provide a community hub, which is likely to include leisure and retail. As such, additional jobs will also be provided. The Economic Needs Assessment 2017 identifies South Godstone the second strongest commercial location due to its rail links and proximity to the M25. | The SA is a comparison of the Garden Community options. South Godstone benefits from access to sustainable transport - primarily the railway. Access to employment via train, bus, the A22, M25 and proximity to Lambs Business Park is recognised as a positive quality in employment terms and that any new development here would be well served in accessing local and wider employment opportunities. Development would significantly increase the need for energy consumption and would need to be a consideration for the development and the potential for sustainable energy generation/CHP, although potential opportunities such as the Waste Local Plan allocation at Lambs do exist. South Godstone is relatively free of flood risk compared to Blindley Heath and Redhill Aerodrome; however, air quality impacts would be relatively more severe. This location has scope to address pre-existing issues within the District; Secondary schools are located towards the periphery of the district. Consequently, those sites in more central locations in the district, such as South Godstone and Blindley Heath, have journey distances of over 6km to the closest secondary school. There is a lack of access to strategic scale accessible natural greenspace, particularly in the South of the District, which could be provided at this location. For South Godstone, the area south of the railway line appears to be the most sustainable location. It is less environmentally constrained whilst affording access to the train station, A22 and a bus service. The far northern area is more sensitive in landscape terms and would need to be considered suitably if any development were to take place. | The positioning of South Godstone broad location on a strategic road network and train line means this location performs well against economic objectives. The close proximity to Lambs Business Park also provides the option to provide local employment opportunities and consider the use of renewable energy that site may provide through its waste allocation in the Surrey Waste Plan. The landscape of this area would need careful consideration to avoid visually sensitive areas, such as the higher ground in the far north of the location. Whilst there are some land assembly considerations, they are not substantial enough to prevent the land coming forward and the site being delivered. This is mainly because the sub-division of plots has meant there are a large number of land owners, however, the plots were brought with the intention for them to be developed. In addition, the plots are to the far east of the area and therefore adequate phasing could help to prevent this holding up the development of the garden community. |
| | +/- | -/ 0 | + | + | ++ | + | 0 | + |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Redhill Aerodrome** | The western part of Tandridge district and this broad location lies within the Upper Mole catchment. The Redhill Brook flows from the north-west of the area and is joined by the Nutfield Brook from the east, with the Salfords Stream flowing from the east to the south-west, being joined by Redhill Brook from the north. The Earlswood Brook flows east to west from the east of the hospital and there are several ordinary watercourses which join both Redhill Brook and Salfords Stream. The Salfords Stream and associated tributaries, including the Redhill Brook, flow generally in a westerly and northerly direction towards the River Mole. Due to the presence of watercourses, some areas of the broad location, particularly on the land within Tandridge, are within Flood Zones 2 and 3a (medium and high risk), with areas of Flood Zone 3b (functional flood plain) also present. Climate change has the potential to change the extents of Flood Zone 3a. This area also includes land at risk of surface water flooding, and whilst the majority of the area has a negligible risk from groundwater flooding, it contains two isolated areas where the risk is higher. However, when considering the wider remit of the location it is predominantly within Flood Zone 1 (low risk) and its development would need to be designed using a sequential approach, with built development primarily located in Flood Zone 1. It would need to include detailed modelling to confirm flood zone and climate change extents and must address all sources of flooding, seeking opportunities to reduce overall levels of flood risk on-site, and ensure it does not exacerbate flooding downstream. The presence of land at medium to high risk of flooding is mostly due to a culvert built to take Redhill Brook underneath the runway currently utilised by the aerodrome. At a time of prolonged heavy rain, the culvert does not have capacity to deal with the brook's flow, causing shallow flooding at either end of the culvert and has a knock on effect. A garden community development at this location could enable flood mitigation in this respect and restore the open watercourse and enhance storm water storage areas to manage heavy water flows and reduce the areas prone to flooding within and outside of the area. Development proposals would need to include SuDs. | This broad location currently has no direct access to any strategic road including the A23, A25 or M23. Officers of TDC and RBBC, as well as the developer and promoter for the location, agree that a new junction off the M23 and link road would be needed if a garden community development were to be possible. Discussions with the Department for Transport and Highways England have not resulted in any assurance that a new junction is programmed to take place. Neither is there reference to a new junction for the M23 included within the emerging Road Improvements Strategy (RIS2) which sets out strategic road improvement priorities up to 2025. As such, the prospect of a new junction or the timescales for delivery remains uncertain. Further, development in this location is likely to have an impact on junctions 6-8 of the M25 and further information is needed to understand the extent of this. The strategic highway modelling identifies that the Redhill Aerodrome garden community causes the least congestion in the AM hour, and relatively low levels for the PM hour. This is partly due to its proximity to the M23 and its hypothesised high-quality connection to that motorway, but its closeness to areas of current and proposed good employment opportunities help limit its highway footprint. It has a lesser impact on the road network in Tandridge than scenarios containing the garden communities at Blindley Heath and South Godstone. This is because trips related to the garden village route via the strategic network or to and from Reigate and Banstead, consequently it is these routes which experience the bulk of the impact. It should be noted that since the Redhill Aerodrome proposed link road is not in the baseline scenario and therefore there is no flow to compare it to, hence why the impacts on the two particular links which represent it are so severe and yet the links in the vicinity do not show such increases. With access into both Tandridge and Reigate & Banstead, the associated traffic flows separate in each direction. In Tandridge the main access is on to the M23, as such this development disperses well on the Tandridge network by not causing great traffic flow increases in the vicinity of the development. Roads in Tandridge which experience slight increases include Kings Mill Lane, the A25 between Godstone and Limpsfield, Quarry Road/Grangers Hill and the B2028 West Park Road. It should be noted that the bulk of the impact of this site is on the strategic road network and on links in Reigate and Banstead. | Existing bus services are primarily located on the Redhill side of this broad location where there are frequent services along A23 into Redhill to the north and to Gatwick to the south, connections and frequency of buses within Tandridge District are much more limited. There are four rail stations within 3.5km of the broad location including Nutfield (Redhill to Tonbridge line), Earlswood, Salfords and Redhill (London to Brighton line). The promoters at this location have identified that frequent bus services will be subsidised initially and will be provided as part of the development increasing access to key employment areas in Crawley, Redhill and Gatwick as well as train stations. It is not clear however, what benefits this would bring for Tandridge residents as improvements are likely to be focused toward western locations. Pedestrian and cycle links would also be provided. | There are four rail stations within 3.5km of the broad location including Nutfield (Redhill to Tonbridge line), Earlswood, Salfords and Redhill (London to Brighton line). Nutfield station, north of the broad location will shortly have its direct London service removed, but discussions with Network Rail identify that improvements to this line and its service is possible with development in this location including the need for mobility impaired access, possibly longer platforms and a new ticket hall. Network rail suggest that there is capacity on the Tonbridge to Redhill line. | Redhill Aerodrome is not directly adjacent to any other settlement and currently only accessible via a rural road network. It is, however, in close proximity to Redhill, Earlswood and South Nutfield settlements. Each of these settlements have some level of service provision including schools, health facilities, retail and leisure, employment and recreational opportunities, although many are at or near capacity and South Nutfield has minimal services and residents have to travel out of settlement for higher scale facilities. A development of approximately 8,000 would significantly add to the pressure of the existing services but would need provide new services and facilities or upscale those existing to offset the impact of development. In addition, the East Surrey Hospital is located adjacent to this site and therefore access to this hospital and possible expansion could also occur and provide alternative access routes to the hospital. Any development of this size needs to provide new schools for all ages, new health facilities, new employment, retail and leisure facilities and recreational uses. Improvements to the road network and public transport would be required and a new junction from the M23 and strategic link road would be necessary. In the strategic sense, this broad location could provide facilities, homes, jobs and services to a wider area, however, it is considered that most of that benefit would be for the residents of Reigate and Banstead. | The Tandridge ENA (2017) identifies that 6.68ha of Redhill Aerodrome forms an employment cluster that contains employment units (in good to very good condition) that predominately consist of a mix of warehousing, industrial and office uses which are primarily aviation related, but there are also other businesses. Approximately 0.5ha of the site had the potential for intensification at the time of the survey. If these employment uses were lost as a result of development they could be relocated and replaced within the wider garden community and additional employment provided, albeit it would stand to reason that the loss of the airfield would man that the current aviation related businesses would also be lost. A garden community at Redhill Aerodrome was considered to be the best option from a commercial perspective due to its strategic location on the A23 and M23, and close proximity to Gatwick Airport. The garden community would be required to provide a community hub, which would likely include leisure and retail. As such, additional jobs will also be provided and would not necessarily lose the existing employment space in that location, although it could be moved to a different area of the wider development. Finally, its proximity to East Surrey Hospital would make it attractive for key worker housing for medical professionals. | The SA is a comparison of the Garden Community options. The Redhill Aerodrome site affords good rail access to train travel via number of nearby stations residents would have access to. It currently has poor road access, although in the long-term offers the prospect of accessing the M23. Redhill Aerodrome broad location is particularly strong on economic objectives given the proximity to Gatwick Airport, Redhill, Crawley and mainline stations into London. Redhill Aerodrome is not without environmental constraints, including flood risk and the presence of Biodiversity Opportunity Areas. A Garden Community at this location would be reliant on a new junction and link road from the M23 and given the uncertainty of this, represents a significant obstacle in being able to consider development at this broad location deliverable within the plan period. | As a result of its proximity to A23, Redhill, Gatwick and Crawley, this broad location strongly serves economic objectives and whilst there is no train station directly within the location, there are four in the surrounding areas providing access to London and Brighton. Development at this location has the benefit to facilitate improvements to East Surrey Hospital and provide key worker properties for medical personnel but would mean that existing aviation associated businesses would be lost, although employment provision would be provided as part of development. That said, its location on the far west of the district and into the neighbouring borough would likely mean that predominant benefits would be felt by non-district residents and businesses. The fundamental issue for this location that it is reliant on a new junction and link road from the M23 and given the uncertainty of this, represents a significant obstacle in being able to consider the location deliverable within the plan period. |


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*Appendix 2 List of Housing Sites and Expected Delivery Timetable*

Please note this table has been updated from the July 2018 version of the topic paper to align with the Housing allocation policies, which should provide clarity.

| | | | | 5 year plan period | | | | | Rest of Plan Period | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Policy reference** | **Site Address** | Site reference number | Settle-ment Tier | **2019/ 2020** | **2020/2021** | **2021/ 2022** | **2022/ 2023** | **2023/ 2024** | **2024/ 2025** | **2025/ 2026** | **2026/ 2027** | **2027/ 2028** | **2028/ 2029** | **2029/ 2030** | **2030/ 2031** | **2031/ 2032** | **2032/ 2033** |
| HSG01 | Land off Redehall Road | SMA 004 | 2 | | | | | | 57 | 57 | | | | | | | |
| | Land at Plough Road, Smallfield | SMA 008 | 2 | | | | | 40 | | | | | | | | | |
| | 51 Redehall Road, Smallfield | SMA 040 | 2 | | | | | 10 | | | | | | | | | |
| HSG02 | 51 Redehall Road, Smallfield | SMA 015 | 2 | | | | 15 | | | | | | | | | | |
| HSG03 | Land North of Plough Road, Smallfield | SMA 030 | 2 | | | | | 60 | 60 | | | | | | | | |
| HSG04 | Woodlands Garage, Chapel Road, Smallfield | SMA 039 | 2 | | | 10 | | | | | | | | | | | |
| HSG05 | Sandiford House, 40 Stanstead Road, Caterham | UCS 02 | 1 | | 14 | | | | | | | | | | | | |
| HSG06 | Land off Salmons Lane West, Caterham | CAT 040 | 1 | | | | | | 75 | | | | | | | | |

| | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| HSG07 | Coulsdon Lodge, Coulsdon Road, Caterham | CAT 081 | 1 | | 15 | | | | | | | | | | | | | |
| HSG08 | 156-180 Whyteleafe Road, Caterham | CAT 007 | 1 | | 59 | | | | | | | | | | | | | |
| HSG09 | Land at Fern Towers, Harestone Hill | CAT 044 | 1 | 6 | | | | | | | | | | | | | | |
| HSG10 | William Way Builders Merchants, 38-42 High Street, Godstone | GOD 021 | 2 | 18 | | | | | | | | | | | | | | |
| HSG11 | Land to the west of Godstone | GOD 010 | 2 | | | | | | | | | | 50 | 50 | 50 | | | |
| HSG12 | Land at the Old Cottage, Station Road, Lingfield | LIN 030 | 2 | | | | | 50 | | | | | | | | | | |
| | Land North of Hobbs End, Church Road, Lingfield, | UCS 11 | 2 | | | | 11 | | | | | | | | | | | |
| HSG13 | Land west of Red Lane, Hurst Green, Oxted | OXT 021 | 1 | | | | | 62 | | | | | | | | | | |
| HSG14 | Warren Lane Depot, Oxted | OXT 067 | 1 | | | | | | | | | | | | 50 | | | |
| HSG15A | 282 Limpsfield Road, Warlingham | WAR 005 | 1 | | | | | 40 | 50 | | | | | | | | | |
| HSG15B | Land to the west of Limpsfield Road, Warlingham | WAR 036 | 1 | | | | 50 | 50 | | | | | | | | | | |
| HSG16 | Green Hill Lane, Warlingham | WAR 011 | 1 | | | | | 25 | | | | | | | | | | |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Land at Alexandra Avenue | WAR 023 | 1 | | | | | 25 | | | | | | | | | |
| HSG17 | Land at Farleigh Road | WAR 012 | 1 | | | | | 50 | | | | | | | | | |
| HSG18 | Former Shelton Sports Club, Warlingham | WAR 019 | 1 | | | | 50 | 50 | 10 | | | | | | | | |
| HSG19 | Edgeworth Close, Warlingham | WAR 016 | 1 | | | 6 | | | | | | | | | | | |
| HSG20 | One Public Estate | CMP1 | 1 | | | | | | | | | 32 | 50 | | | | |
| TLP28 | Church Walk, Caterham | CMP2 | 1 | | | | 50 | 50 | 50 | | | | | | | | |
| | Furniture Store, Caterham | CMP4 | 1 | 20 | | | | | | | | | | | | | |
| | Golden Lion | CMP6 | 1 | | | | 15 | | | | | | | | | | |
| TLP29 | 43 East Hill, Oxted | UCS 09 | 1 | | | | | 50 | | | | | | | | | |
| | 110 Station Road east, Oxted | OXTC1 | 1 | | 10 | | | | | | | | | | | | |
| | | | | 44 | 98 | 16 | 191 | 562 | 302 | 57 | 0 | 32 | 100 | 50 | 100 | 0 | 0 |

*Appendix 3 Housing Trajectory*

This Appendix details the current land supply position to 2033. It includes all committed sites in the Trajectory, Local Plan site allocations, Neighbourhood Plan allocations and main residential windfalls over the Plan period and the current 5-year housing land supply period. The Local Development Scheme sets out that the Local Plan is to be adopted in 2019 and therefore the five year land supply calculation has taken 2019/2020 as the first year of the five year supply.

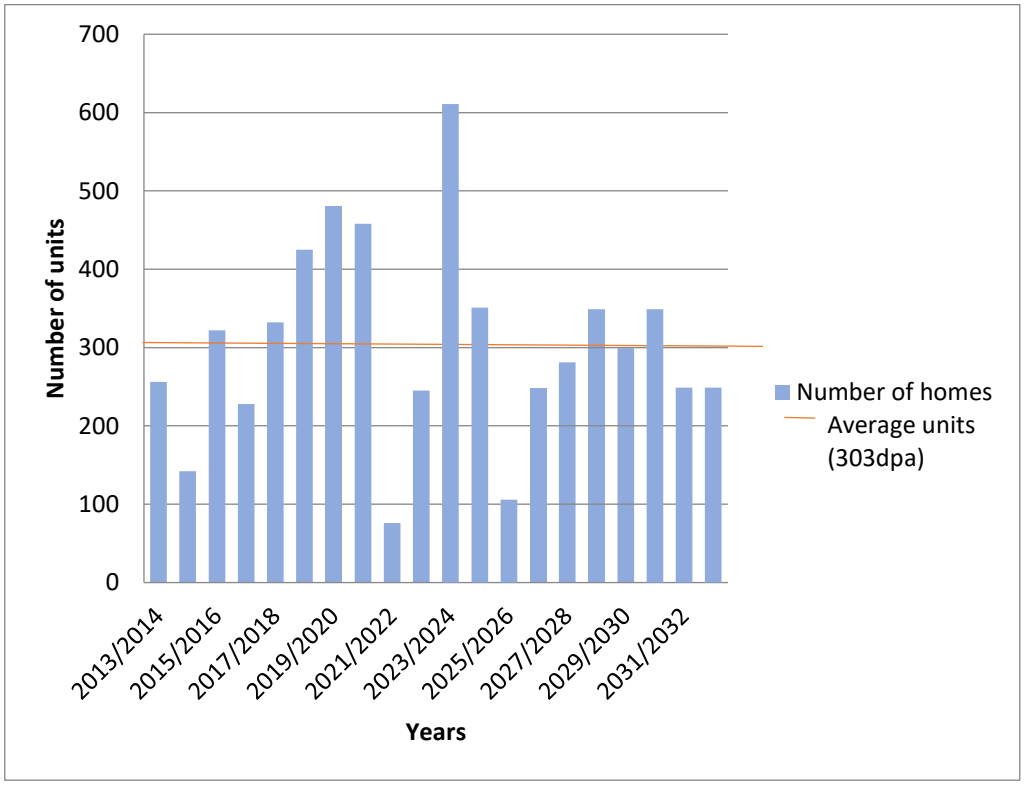
For clarity, the Housing Topic Paper July 2018 provided a table that showed these figures, but it did not relate directly to the table in the Local Plan (TLP01). For clarity, this table has been updated to reflect the same sources as TLP01 in the Local Plan. Please note, some figures may be slightly different to TLP01 due to rounding.

| | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | Source Totals: |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Completions** | 256 | 142 | 322 | 228 | 332 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **1280** |
| **Permissions (up to expiry)** | 0 | 0 | 0 | 0 | 0 | 376 | 384 | 294 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **1054** |
| **Tier 1 Settlement Sites** | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 88 | 6 | 100 | 302 | 125 | 0 | 0 | 32 | 50 | 0 | 50 | 0 | 0 | **759** |
| **Tier 2 Settlement Sites** | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 10 | 26 | 160 | 127 | 57 | 0 | 0 | 50 | 50 | 50 | 0 | 0 | **548** |
| **Garden Community** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 200 | 200 | 200 | 200 | 200 | 200 | 200 | **1400** |
| **Windfall** | 0 | 0 | 0 | 0 | 0 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | **435** |
| **Town Centre Initiatives** | 0 | 0 | 0 | 0 | 0 | 0 | 20 | 10 | 0 | 65 | 100 | 50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **245** |
| **Other Supply (includes empty homes figure)** | 0 | 0 | 0 | 0 | 0 | 20 | 23 | 37 | 31 | 25 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | **336** |
| **Totals** | **256** | **142** | **322** | **228** | **332** | **425** | **480** | **458** | **76** | **245** | **611** | **351** | **106** | **249** | **281** | **349** | **299** | **349** | **249** | **249** | **6,057** |
| | **1,705** | | | | | | **1,870** | | | | | **1,336** | | | | | **1,146** | | | | |

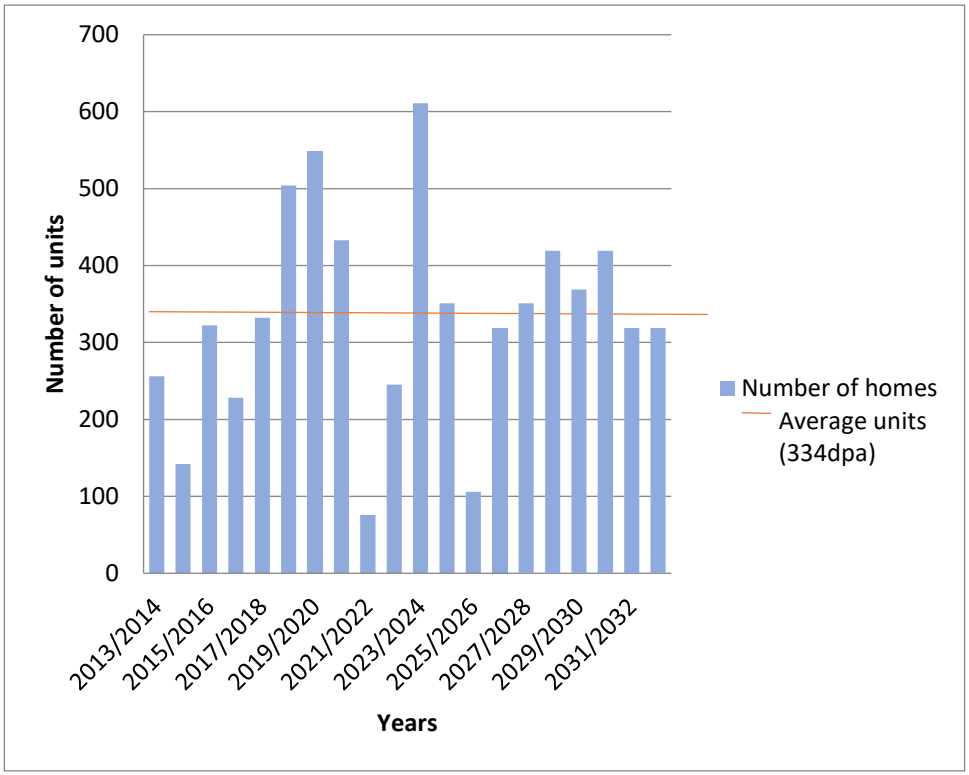
Appendix 4 Housing Trajectory with Updated Information and Accelerated Delivery of Garden Community

| | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | Source Totals: |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Completions** | 256 | 142 | 322 | 228 | 332 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **1377** |
| **Permissions (up to expiry)** | 0 | 0 | 0 | 0 | 0 | 358 | 453 | 269 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **1080** |
| **Tier 1 Settlement Sites** | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 88 | 6 | 100 | 302 | 125 | 0 | 0 | 32 | 50 | 0 | 50 | 0 | 0 | **759** |
| **Tier 2 Settlement Sites** | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 10 | 26 | 160 | 127 | 57 | 0 | 0 | 50 | 50 | 50 | 0 | 0 | **548** |
| **Garden Community** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 270 | 270 | 270 | 270 | 270 | 270 | 270 | **1890** |
| **Windfall** | 0 | 0 | 0 | 0 | 0 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | 29 | **435** |
| **Town Centre Initiatives** | 0 | 0 | 0 | 0 | 0 | 0 | 20 | 10 | 0 | 65 | 100 | 50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **245** |
| **Other Supply (includes empty homes figure)** | 0 | 0 | 0 | 0 | 0 | 20 | 23 | 37 | 31 | 25 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | **336** |
| **Totals** | **256** | **142** | **322** | **228** | **332** | **504** | **549** | **433** | **76** | **245** | **611** | **351** | **106** | **319** | **351** | **419** | **369** | **419** | **319** | **319** | **6,670** |
| | **1,784** | | | | | | **1,914** | | | | | **1,546** | | | | | **1,426** | | | | |

## *Appendix 5 Housing Trajectory Graphs*




Graph 3 – Based on Appendix 3 housing trajectory




Graph 4 – Based on Appendix 4 housing trajectory

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