



**Land south of Barrow Road, Oxted**  
**PINS Ref: APP/M3645/W/25/3372747**  
**Statement of Common Ground: Five Year Housing Land Supply**  
*18<sup>th</sup> December 2025*

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## **1. Introduction**

- 1.1. This Draft Housing Land Supply ("HLS") Statement of Common Ground ("SoCG") has been prepared by Mr Steven Brown (of Woolf Bond Planning Ltd), on behalf of the Appellant, Croudace Homes Ltd and Mr Nick Perrins on behalf of Tandridge District Council ("TDC").
- 1.2. This HLS SoCG has been prepared following the Appellant's review of the Council's 'Interim Five Year Land Supply Statement' (November 2025) (**CD7.2**).
- 1.3. This HLS SoCG sets out both the agreed and disputed matters having regard to the five year housing land supply position.
- 1.4. This HLS SoCG identifies the requirement to be met during the five year period, the respective positions on the disputed components of supply; and the respective five year housing land supply positions.

## **2. The Agreed Position**

- 2.1. It is common ground that the Council is not able to demonstrate a five year supply of deliverable housing land against the minimum five year requirement for the period 1<sup>st</sup> October 2025 to 30<sup>th</sup> September 2030.
- 2.2. It is common ground that the extent of the shortfall in housing land supply is at least 2,806 dwellings with a maximum supply of 2.17 years. The extent of the shortfall is therefore agreed as substantial.
- 2.3. It is agreed that there is a significant under supply of market and affordable housing when assessed against the local housing need figure calculated under the government's standard method.
- 2.4. It is likely that the shortfall can be reduced if planning approval is given for a range of sites, including on land beyond settlement boundaries and land or sites not currently allocated for housing in the adopted development plan.
- 2.5. In the circumstances, it is agreed that for the purpose of paragraph 11 of the NPPF, the most important policies for determining the application are out of date and para. 11 (d) is engaged.

- 2.6. It is also agreed that the Appellant considers that the contribution of market housing proposed through the Appeal Scheme is a material consideration of very substantial weight; and that the delivery of affordable housing from the Appeal Scheme also attracts very substantial weight. It is the Council's position that the contribution of market and affordable housing is a material consideration of significant weight.

### **3. The Housing Requirement and Five Year Period**

- 3.1. It is agreed between the parties that the five-year period to be used for the purpose of calculating the five year housing land supply position for this appeal is 1<sup>st</sup> October 2025 to 30<sup>th</sup> September 2030.
- 3.2. In so far as the strategic policies from the Core Strategy are more than five years old, it is agreed, by operation of paragraph 78 and footnote 39 of the NPPF, that the housing requirement falls to be measured against the local housing need figure calculated using the standard method.
- 3.3. As such, the starting point when calculating the five year requirement is the minimum 827 dwelling annual requirement derived from the application of the Standard Method, taking into account the latest data regarding the inputs<sup>1</sup>. This equates to a minimum 4,135 dwelling requirement.
- 3.4. As a result of the Housing Delivery Test ("HDT") results published on 12 December 2024, it is agreed that it is appropriate to apply a 20% buffer to the requirement.
- 3.5. The agreed minimum five year requirement for the period 1<sup>st</sup> October 2025 to 30<sup>th</sup> September is 4,964 dwellings.
- 3.6. The minimum 4,964 dwelling requirement is calculated as follows:

827dpa x 5 years = 4,135.  
Add 20% buffer = +827  
Total Requirement = 4,962 dwellings

### **4. Agreed Definition of Deliverable**

- 4.1. It is agreed that the definition of deliverable is explained in the Glossary to the NPPF (page 72), and the PPG (ID 68-007-20190722). The parties agree that the definition of deliverable in the Glossary to the NPPF is not restricted to categories a) and b) because "in particular" means that it is not a closed list.

### **5. The Respective Housing Land Supply Positions**

- 5.1. The agreed position between the Council and Appellant is that the Council is not able currently to demonstrate a five year supply of deliverable housing land for the period 1<sup>st</sup> October 2025 to 1<sup>st</sup> September 2030.

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<sup>1</sup> Dwelling stock data released on 22<sup>nd</sup> May 2025 (Table 125) and median workplace based affordability ratios issued on 24<sup>th</sup> March 2025

- 5.2. As such, it is common ground between the Council and Appellant that the Council is not meeting the requirements at paragraphs 78 of the NPPF. In the circumstances, para. 11(d) of the NPPF is engaged.
- 5.3. The Appellant has reviewed the details in the Council's 'Interim Five Year Land Supply Statement' (November 2025) (**CD7.2**).
- 5.4. The Appellant disputes the delivery of a number of sites/components of supply.
- 5.5. The respective housing land supply positions for the five year period 1<sup>st</sup> October 2025 to 30<sup>th</sup> September 2030 are summarised in Table 1 below.

*Table 1: The respective Five-Year Housing Land Supply Position*

<b>Step</b>	<b>TDC</b>	<b>Appellant</b>
A - Annual requirement	827	827
B - Base year Requirement (A x 5):	4,135	4,135
C - Add 20% buffer pursuant to HDT (B x 20%)	827	827
<b>D – Final five year requirement (B + C)</b>	<b>4,964</b>	<b>4,964</b>
E - Annual requirement (D/5)	993	993
<b>F – Deliverable supply</b>	<b>2,158</b>	<b>1,223</b>
G - No. Years Supply (F/E)	<b>2.17</b>	<b>1.23</b>
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	<b>-2,806</b>	<b>-3,741</b>

## **6. Summary**

- 6.1. The agreed position between the Council and Appellant is that the Council is not able currently to demonstrate a five year supply of deliverable housing land for the period 1<sup>st</sup> October 2025 to 30<sup>th</sup> September 2030.
- 6.2. The Council's position is that it can demonstrate a maximum 2.17 years' supply of deliverable housing land, which results in a shortfall of at least 2,806 dwellings.
- 6.3. The Appellant's position is that the Council is only able to show a maximum of 1.23 years' supply of deliverable housing land, which results in a shortfall of at least 3,741 dwellings.
- 6.4. In the circumstances, it is agreed that the Council's housing land supply position does not need to be tested in evidence. This will save time and resources ahead of preparing evidence for the inquiry.
- 6.5. This HLS SoCG is signed and dated below.

**Signatures**

On behalf of the Appellant:

Signed:.....*Steven Brown*.....

Name: Steven Brown BSc Hons DipTP MRTPI for Woolf Bond Planning Ltd obo Croudace Homes Ltd

Date: 18<sup>th</sup> December 2025

On behalf of Tandridge District Council

Signed: .....*N Perrins*.....

Name: Nick Perrins for Tandridge District Council MRTPI Planning Policy Manager (Interim)

Date: 18<sup>th</sup> December 2025

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