Introducing the Tandridge Housing Forum

The Tandridge Housing Forum (THF) was set up in August 2018 as a means of assisting the Inspector, the District Council and other key stakeholders through Tandridge District Council’s Local Plan Examination. The Forum comprises key landowners, housebuilders and development promoters in the District. Judith Ashton Associates has been appointed to represent the Forum on relevant planning matters. The purpose and intention is to positively engage with the District and ultimately improve communication between the industry and the Council to enable the delivery of development. To that end, the Forum has invited the District Council to its Meetings (although to date the District Council has not taken up the invitation).

The Members of the Developers Forum who have instructed this Joint Written Statement are:

- Catesby Estates Plc
- Crest Strategic Projects
- Croudace
- Fairfax Properties
- Land Group UK
- Millwood Designer Homes
- Rydon Homes
- Taylor Wimpey Strategic Land
- Thakeham Homes
- Wates Developments

A full list of the relevant Developers Forum land interests has been provided with this submission.

It should be noted that on some specific matters, individual Members of the Forum will be making separate submissions.

Planning Consultants / Technical Consultants who have inputted into this statement include:

- Lichfields
- RPS
- Neame Sutton representing Catesby Estates Plc
- Barton Willmore representing Crest Strategic Projects
- Nexus Planning representing Taylor Wimpey Strategic Land
- Savills representing Thakeham Homes
- Boyer representing Croudace
**Matter 1: Procedural/legal requirements**

**Issue:** Whether all Statutory and Regulatory requirements have been met?

### Duty to Cooperate

**1.1** Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the Planning and Compulsory Purchase Act 2004, as amended [the 2004 Act]? Is there clear evidence that the Council has done all it reasonably could to maximise the effectiveness of plan preparation by cooperating with all other relevant bodies, particularly in respect of addressing unmet housing need?

1.1.1 In our reps of the Reg 19 Consultation in Sept 2018 we highlighted the fact that the 2015 version of the ‘Defining the Housing Market Area’ (‘HMA’) Technical Paper produced by Turley indicated that Tandridge has links to Croydon, Reigate and Banstead and Mid Sussex, plus Sutton, Sevenoaks and Crawley. It concluded that whilst Tandridge is not a standalone housing market area (for example, migration and commuting self-containment was relatively low), as neighbouring authorities had already produced evidence across their areas (or were in the process of doing so), Tandridge would be required to prepare its own SHMA. More recent ONS migration data reviewed in the 2018 HMA paper update (HNS13)\(^1\) confirms that the District still has a strong relationship to Croydon and that Tandridge was not likely to be self-contained. It reached the same conclusion as the 2015 paper, i.e. that neighbouring authorities had been progressing SHMAs without Tandridge, hence Tandridge needed to prepare its own SHMA.

1.1.2 At the time of our Reg 19 reps the Housing Topic Paper (2018) (HTP) suggested at para 392 that Tandridge was part of the London HMA. The 2019 HTP at para 392 however reiterates the points made in the former SHMA - that Tandridge is a functional component of a HMA with Croydon, Reigate and Banstead and Mid Sussex. TDC’s position on the HMA within which they sit is as such rather confusing.

1.1.3 To this end we note that Section 6 of the Reg 22 Local Plan indicates that Statements of Common Ground are still to be agreed with Croydon and Reigate and Banstead.

1.1.4 In February 2019 we wrote to the Planning Inspectorate to place on record our concerns about the Plan proceeding to examination as submitted. In doing so we suggested that there appeared to have been a failure to follow the advice in paragraph 157 of the NPPF, in particular a failure in the approach to co-operation with neighbouring authorities, especially those within the same HMA.

1.1.5 In April 2019 we wrote to you Sir to advise that we had obtained leading counsel’s formal Opinion on whether, in preparing the Tandridge Local Plan, TDC had complied with the DTC imposed by section 33A of the Planning and Compulsory Purchase Act 2004. Said Opinion is enclosed at appendix A. This makes it clear that:

1. Engagement has not been active and ongoing.

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\(^1\) See para 2.24 in terms of migration flows and section 5 re the HMA
2. In particular, there has been no active and ongoing engagement in relation to every other person identified at section 33A(1), which includes considering whether to agree to prepare joint local development documents.

1.1.6 Paragraph 98 of Counsellor’s Opinion advises:
‘The 2014 Scoping Statement refers to guidance recommending that consideration be given to preparing joint local development documents. The 2014 Scoping Statement does not refer to the statutory duty (imposed by section 33A(6)(b) PCPA 2004) that when engaging consideration should be given to preparing joint local development documents. The Scoping Statement does not indicate how the Council intended to fulfil that duty.’

1.1.7 Paragraph 103 of Counsellor’s Opinion goes on to state:
‘Reference is made in the 2018 DTC Update to the consideration of joint local plans, but that reference does not provide evidence of ongoing discussion of that issue. Further the notes of meetings with individual councils do not refer to such consideration. On that basis, and absent some further evidence, in my view an inspector could not rationally come to a view that it was reasonable to conclude that the Council have complied with the duty to co-operate.’

1.1.8 The opinion concludes:
‘For the reasons set out above, it is my opinion that, in preparing the TLP, the Council failed to fulfil the duty to cooperate.’

1.1.9 Since Counsellor’s opinion was issued, we note the following:

1.1.10 Sevenoaks District Council formally submitted their LP for examination in April 2019. The Local Plan examination is scheduled to begin on the 24th September. Said plan refers to the housing need as 13,960 dwellings over the period 2015-2035, or 698dpa. But only seeks to deliver 10,568 dwellings over the period 2015-2035. There is thus a shortfall of 3,392 dwellings over the plan period (170dpa).

1.1.11 The Statement of Common Ground signed between TDC and SDC in Dec 2018 acknowledges at para 2.1.7 that TDC’s unmet need will be circa 1,904 dwellings based against the 2018 OAN. At para 2.1.10 it is acknowledged that SDC will also have an unmet need. The SoCG goes on to state:
‘Discussions have taken place with neighbouring authorities in the HMA to discuss assistance with unmet need, but no authority to date has been in a position to assist SDC with unmet need. Consequently both councils will continue to work together and identify the position as both TDC and SDC prepare to review their local plans every 5 years.’

1.1.12 In June 2019 Reigate and Banstead Borough Council (RBBC) undertook a ‘Local Plan Review’. In the associated papers RBBC acknowledge that: The Core Strategy (adopted July 2014) established a housing requirement of at least 6,900 homes between 2012 and 2027 – 460dpa; The OAHN for RBBC at the CS examination was between 600 and 640 dpa; The CS Inspector accepted meeting the full OAHN would not be sustainable or consistent with the Framework given the environmental and other constraints across the borough;
Using the standard method and adopting a 40% cap above the plan figure as the CS was adopted within the past five years, the local housing need for RBBC would equate to 644 dpa i.e. a figure not dissimilar to that assessed by the CS Inspector; If the plan were over 5 years old, using the standard method the OAHN would be 1,148 dpa; and that the CS inspector has acknowledged in his report that population projection and other aspects of the evidence base at that time indicated potentially significantly higher needs, potentially in the order of 850 to 933 homes per annum; That the constraints upon the borough remain, and that the NPPF continues to recognise that actual planned housing requirements should respond to local constraints, as was the case when the Core Strategy was examined.

1.1.13 RBBC’s Local Plan Review concludes:

‘As such, although mindful of the advice in the NPPF 2019 (para 33) regarding consideration of local housing needs through plan reviews, it is not considered in this case that the housing needs or wider national policy on housing delivery have changed in such a way as to warrant or necessitate a modification to the housing requirement in Policy CS13, or any other aspect of it.’

1.1.14 In effect the above means that RBBC will continue to promote a housing target below their OAHN, and thus have an unmet need of circa 180dpa. Nowhere in the Local Plan Review does the issue of the DTC appear. Furthermore, with no SoCG on the matter it is unclear how TDC/RBBC (who fall within the same HMA) intend to address this point. There is no evidence to indicate, that the DTC was considered in the course of reviewing the RBBC Local Plan, and in particular, it has not been demonstrated that TDC sought to co-operate with RBBC in the course of that review.

1.1.15 Croydon Councils Local Plan is currently subject to a partial review. Whilst the adopted plan (Feb 2018) looks to deliver 1,644dpa Croydon council have acknowledged that the emerging new London Plan includes significantly increased housing numbers, which the council have sought to address through the review. This would suggest that Croydon will not be able to assist TDC in meeting their unmet need, albeit there is no SoCG on the matter, and Croydon Council actually objected to the Regulation 19 Plan, as did the Coast to Capital LEP.

1.1.16 Whilst we remain of the view that engagement has not been active and ongoing, we note that the Duty to Cooperate Statement 2018 indicates at para 3.23 that said statement shows ‘the ongoing discussions the Council has on duty to cooperate matters relating to Plan preparation and the impact they could have on the wider area’; and that ‘All neighbouring authorities are happy to prepare Statements of Common Ground to ensure consideration of unmet need and that the duty has been met’. Whilst table 1: Duty to Cooperate on Housing, sets out who TDC have been in discussion with, and the actions taken, nowhere is there any indication of the scale of the unmet need (167 if one accepts TDC OAN of 470dpa\(^2\)) and how this is to be met/who is prepared to help TDC in this regard. Additionally, Table 1 represents a snapshot in time and does not demonstrate compliance with the duty for active and ongoing engagement. The NPPF is clear at para 179 that where housing needs cannot be met due to lack of physical capacity or the significant harm this would

\(^2\) 307 using the Forums OAN of 610dpa
cause to the principles and policies of this Framework that joint working should enable LPAs to work together in order to meet these needs.

1.1.17 Whilst we accept there have been some discussions, there appears to be no concrete actions arising out of these discussions that would demonstrate how the unmet housing needs are to be addressed if the Plan proceeds as currently drafted i.e. there are no clear statements in the Plan / or the evidence base as to how unmet needs will be addressed. No joint housing needs assessment has been undertaken and there are no formal agreements about how housing needs will be met across this area. As TDC have stated that they cannot meet the identified need for housing in Tandridge it is important that the authorities in the HMA work together to address these needs. PPG stresses the importance of achieving positive outcomes and the need for the Duty to Co-operate to be more than just a tick box exercise. For example, paragraph 010 Reference ID: 9-010-20140306 states: “Cooperation between local Planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local Planning authorities have approached others.”

1.1.18 Paragraph 011 Reference ID: 9-011-20140306 continues: “Local Planning authorities should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone.”

1.1.19 Having regard to the above and to para 182 of the NPPF (2012) we fail to see how the Plan can be said to be based on effective joint working on cross-boundary strategic priorities. There has been a clear failure to cooperate effectively, actively and on an ongoing basis and as a result the Plan is unsound (as it is not based on co-operation with neighbouring authorities as required by paragraph 157 NPPF). Furthermore failure to comply with the DTC means the plan has failed to accord with the requirements of section 33A of the Planning and Compulsory Purchase Act 2004 i.e. it is not Legally Compliant. This cannot be fixed post submission. Either the plan as submitted complied or it did not.

1.1.20 One of the objects of the DTC is to ensure co-operation between local planning authorities, and thereby ensure that needs can be met across HMAs. TDC’s failure to co-operate may be thought to have contributed to considerable level of undersupply in the HMA (see table 1 below), a position that is exacerbated if one also assess the current level of housing provision against the requirement set out in the Governments Standard Methodology (see table 2 below). This also highlights the fact that given the status of plans in adjacent authorities TDC are unlikely to be able to look to their neighbours to help meet their unmet need. To this end we note that the SA has not assessed the effect TDC not meeting its OAN will have on those neighbouring authorities that fall within the same HMA. And that Appendix 2 of the SA in considering in combination effects with surrounding authorities does not actually comment upon/ take into account the issue of unmet need – either within said authorities’ or in terms of TDC’s position
Table 1: Level of housing provision proposed in neighbouring authorities relative to the authorities OAN

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<thead>
<tr>
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<th>A</th>
<th>B</th>
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<tbody>
<tr>
<td></td>
<td>Planned Housing &amp; Period</td>
<td>Plan status</td>
<td>Up to date OAN</td>
<td>Difference (A-C)</td>
</tr>
<tr>
<td>Crawley</td>
<td>4,806 homes in the 15 year</td>
<td>Regulation 18</td>
<td>634 dpa (SHMA Mar 2015)</td>
<td>- 314 dpa</td>
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<tr>
<td>Croydon</td>
<td>1,644 dpa</td>
<td>Adopted Feb 2018</td>
<td>1,435 dpa in the London Plan⁴</td>
<td>+209 dpa</td>
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<tr>
<td></td>
<td>2016 -2036</td>
<td></td>
<td>2,207 dpa in the SHMA and Addendum Report 2015)</td>
<td>-563 dpa</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>16,390 homes in the period</td>
<td>Adopted March 2018</td>
<td>876 dpa as arrived at</td>
<td>+88 dpa⁵</td>
</tr>
<tr>
<td></td>
<td>2014 – 2031</td>
<td></td>
<td>through local Plan examination</td>
<td>(as an average over the Plan period)</td>
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<tr>
<td></td>
<td>(average 964 dpa)</td>
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<tr>
<td></td>
<td>876 dpa</td>
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<td></td>
<td>(2014/15 -2023/24) &amp; 1,090 dpa (2024/25 -2030/31)</td>
<td></td>
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</tr>
<tr>
<td>Reigate and Banstead</td>
<td>460 dpa</td>
<td>Adopted July 2014</td>
<td>640 dpa (Inspector’s report into CS 2014)</td>
<td>-180 dpa</td>
</tr>
<tr>
<td></td>
<td>(2012-2027)</td>
<td></td>
<td></td>
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<tr>
<td>Sevenoaks</td>
<td>9,410 (628 dpa)</td>
<td>Reg 22 April 2019</td>
<td>707 dpa Based on Standard Methodology and period of 2019 – 2035⁶</td>
<td>-79 dpa</td>
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<td></td>
<td>(190-2035)</td>
<td></td>
<td></td>
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<tr>
<td>Sutton</td>
<td>427 dpa</td>
<td>Adopted Feb 2018</td>
<td>363 dpa in the London Plan⁷</td>
<td>+ 64 dpa</td>
</tr>
<tr>
<td></td>
<td>(2016-2031)</td>
<td></td>
<td>1,098 dpa in the SHMA</td>
<td>-671 dpa</td>
</tr>
<tr>
<td>Tandridge</td>
<td>303 dpa</td>
<td>Reg 19 July 2018</td>
<td>470 dpa (OAN Sep 2015)</td>
<td>-167 dpa</td>
</tr>
<tr>
<td></td>
<td>(2013-2033)</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Difference</td>
<td></td>
<td></td>
<td></td>
<td>-379⁸ to -1886⁹</td>
</tr>
</tbody>
</table>

³ Adopted Core Strategy 2015 proposed 340dpa 2015 – 2030
⁴ NB new London Plan increases this to 2,949 dpa
⁵ This was specifically identified to meet the unmet needs of Crawley
⁶ NB current Core Strategy (Feb 2011) is 165dpa (2006-2026)
⁷ NB the new London Plan increases this to 939dpa
⁸ If measured against the London Plan
Table 2: Level of housing provision proposed in neighbouring authorities relative to the requirement set out in the Governments Standard Methodology

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<tbody>
<tr>
<td></td>
<td>Planned Housing &amp; Period</td>
<td>Plan status</td>
<td>Standard Methodology April 2019 Capped at 40%</td>
<td>Difference (A-C)</td>
</tr>
<tr>
<td>Croydon</td>
<td>1,644 dpa 2016 -2036</td>
<td>Adopted Feb 2018</td>
<td>2,302 dpa</td>
<td>- 658 dpa</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>16,390 homes in the 17-year period 2014 – 2031 (average of 964 dpa) 876 dpa (2014/15 -2023/24) and 1,090 dpa (2024/25 -2030/31)</td>
<td>Adopted March 2018</td>
<td>1,102 dpa</td>
<td>-138 dpa</td>
</tr>
<tr>
<td>Reigate and Banstead</td>
<td>460 dpa (2012-2027)</td>
<td>Adopted July 2014</td>
<td>644 dpa</td>
<td>-184 dpa</td>
</tr>
<tr>
<td>Sevenoaks</td>
<td>9,410 (628 dpa) (2019-2035)</td>
<td>Submission Plan April 2019</td>
<td>707 dpa</td>
<td>-79 dpa</td>
</tr>
<tr>
<td>Sutton</td>
<td>427 dpa (2016-2031)</td>
<td>Adopted Feb 2018</td>
<td>598 dpa</td>
<td>-171 dpa</td>
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<td></td>
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<td>-1,731</td>
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\(^{9}\) If measured against the SHMA
\(^{10}\) Savills Research using MHCLG and ONS – Updated for April 2019 Affordability Ratios
\(^{11}\) Adopted Core Strategy 2015 proposed 340dpa 2015 – 2030
The Sustainability Appraisal (SA)
1.2 Is the Sustainability Appraisal (SA) adequate?
1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?
1.4 Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

1.1.21 In our reps of the Reg 19 Consultation in Sept 2018 we highlighted the fact that the SA in assessing reasonable alternatives to the overall housing numbers indicated in section 5.4 of volume 2 that the following options were assessed:
- Objectively Assessed Need (OAN) – 470 dpa
- DCLG new methodology housing number – 645 dpa
- Maximum potential in light of background evidence – 306dpa
- Continuation of Core Strategy 2008 Equivalent – 125 dpa

1.1.22 We note that the Jan 2019 SA that accompanies the submission plan (Doc MD5) reiterates the statements made within the Sept 2018 SA (Doc SSHA3), i.e. that in discussing the options against SA Objectives, which include SA objective 1 to ‘provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford’, the SA states:
“Clearly achievement of the DCLG housing number, and to a lesser extent the objectively assessed need, are positives in respect of boosting the supply of housing (Objective 1).
However, in almost every other respect, achievement of these higher housing numbers would come at significant cost to wider sustainability objectives. In particular they would raise the likely risk of significant effects on environmental objectives, creating increasing pressures on environmental and heritage designations. Higher numbers would inevitably increase pressure for higher densities on site (reducing scope for on-site enhancements) and also lead to more greenfield development, since the District has already exhausted its supply of brownfield previously developed land. Natural resources and social infrastructure would be increasing strained with the implementation of OAN numbers, more so still with DCLG new methodology numbers.
Even economic objectives (6&7) seem likely to be negatively affected by the OAN and DCLG numbers. This is because the growth rate would be unsustainable, negatively affecting the balance of local homes and jobs. Higher housing numbers would lead to increased pressure on employment premises to change use to residential – incentivised by greater land values and a more relaxed permitted development order at national level. Pressure for housing development to be extended into tier 3 and 4 settlements, or even the open countryside would inhibit the ability of theLocal Plan to reduce car dependency and support town centres”

1.1.23 It is on this basis that the Reg 22 Plan has sought to proceed with a housing target of just 303dpa (6,056 dwellings over the Plan period). 12

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12 In doing so p158 of the SA (MD5) recognises that
‘Tandridge is one of the least affordable local authority areas in Surrey with an affordability ratio of more than 14.1 times earnings and an affordable housing need of 5,680 homes over the plan period’

And Appendix 1 of the SA (p367) (MD7) states:
1.1.24 Section 5.5. of the SA in commenting upon the options assessed to meet the affordable housing need acknowledges that; ‘the SHMA identified an affordable housing need for 330 dwellings per annum (2013 - 2033), and that based on current affordable housing policy this would require an overall delivery of 6,605 dwellings over the plan period to deliver the required level of affordable housing in full. The affordable need represents 107% of the deliverable Local Plan housing target over the 2013-33 period’. The SA goes on to suggest that; ‘The challenges of meeting the current Local Plan 2033 housing target are already significant. Clearly the environmental and social impacts of three times the scale of growth would be phenomenal – unprecedented levels of greenfield development would be required, permanently altering the rural character, landscape and heritage of the District, as well as leading to a probable host of related detrimental environmental effects.’ On this basis whilst the SA tests the scenario of meeting 100% of affordable housing need, we take this to mean 6,065 dwellings over the plan period, which it suggests ‘represents a significant sustainability challenge’. This however fails to recognise that not all sites provide affordable housing and that in order to meet 100% of the affordable requirement one would (assuming a 40% affordable requirement), conservatively need to deliver circa 16,625 dwellings (831dpa) over the plan period. Which is not a figure tested by the SA. Indeed, the SA appears to have applied the affordable housing need in a manner to bolster its position on the overall plan figure rather than assess the effects of failing to deliver/seeking to deliver the full affordable housing needs of the district.

1.1.25 Section 5.6 of the SA in commenting upon the relationship of new residential allocations to existing built form/settlement boundaries appears to support an approach that looks to allocate development sites adjacent to existing built form/settlement boundaries. This approach it acknowledges ‘may lessen the supply of housing overall’ and is not in our opinion the approach adopted given that circa 40% of the residual housing requirement is to be delivered via the new Garden Village at South Godstone. This begs the question as to whether the spatial strategy adopted in the Reg 22 plan reflects the SA, and whether the SA is both robust in its assessment of the alternatives assessed.

1.1.26 Whilst we note that table 23 of the SA encompasses the SA of the Strategic Settlement Hierarchy and Suitability for Growth, and clearly looks to promote development within the upper tier settlements, when comparing the assessment matrix for South Godstone (table 46) and that for South Godstone Garden Community Option (table 57), against the assessment matrix for the sites that were assessed in for example Caterham (table 30), Dormansland (table 34), Felbridge (table 36), Godstone (table 38), Lingfield (table 40), Oxted (table 42), Smallfields (table 44) and Warlingham & Whyteleafe Site (table 52), it appears that the sites in Caterham, Dormansland, Godstone, Lingfield, Oxted, Smallfields and Warlingham & Godstone (table 38), Lingfield (table 40), Oxted (table 42), Smallfields (table 44) and Warlingham & Whyteleafe Site (table 52), it appears that the sites in Caterham, Dormansland, Godstone, Lingfield, Oxted, Smallfields and Warlingham &

The county of Surrey (of which Tandridge is part of) at the end of 2016 had comfortably the most expensive median house price in the country.
- Of the 11 local authorities in the county of Surrey at the end of 2016, Tandridge had the 6th highest median house price.
- The median house price in Tandridge increased by 30% between 2011 (£300,000) and 2016 (£390,000).

Total requirement = 6056.
2,334 already committed so residual requirement = 3,722, of which 1400 = South Godstone = 37.6%
Whyteleafe score more favourable than those in South Godstone / the South Godstone Garden Community Option, in many areas especially:

Health (Caterham, Godstone, Lingfield, Smallfields and Warlingham & Whyteleafe)
Transport and services (Caterham, Oxted and Warlingham & Whyteleafe)
Economics (Caterham)
Natural resources (Caterham and Warlingham & Whyteleafe)
Flood risk (Caterham, Dormansland, Felbridge, Godstone, Lingfield, Oxted, Smallfields, and Warlingham & Whyteleafe)
Air quality, noise and light pollution (Caterham, Dormansland, Lingfield, Oxted, and Warlingham & Whyteleafe)

The one objective that South Godstone scores more highly in than any other area is climate change mitigation. Yet the SA and Reg 22 Plan still look to promote the South Godstone Garden Village above these alternatives, which suggests the SA has not been undertaken on the basis of a consistent methodology and is not robust. It also calls into question the rational for seeking to oppose these alternatives given the acute housing needs of the area and fact these options appear less environmentally harmful than the chosen option. The SA should have assessed a further option, one that encompassed the preferred approach and some of development in these less sensitive areas to arrive at an alternative option that would have provided for more of Tandridge’s needs. Surely it is not unreasonable to expect TDC to have pursued this approach with more vigour if they wanted to promote a plan that is ‘positively prepared’ and consistent with national policy. For the avoidance of doubt the Forum is not suggesting that a spatial strategy removing South Godstone in favour of these alternative locations is the right approach, but it is clear that the strategy the Council has pursued is not supported by its own evidence. When applying the evidence there are alternative strategies available that would enable more development to be accommodated in less sensitive areas in the short-term alongside the Council’s proposals for a Garden Community in due course.

1.1.27 Although the selection of reasonable alternatives is dependent upon an evaluative judgement, it is the Forum’s view that the alternative referred to above (of accommodating a greater quantum of development in less sensitive locations along with the Garden Village so as to meet OAN for housing) is both realistic and reasonable, and should have been assessed alongside the other options.

1.1.28 In noting the conclusions of the SA on the matter of the overall housing number, we would question the extent to which the chosen option does in fact meet SA objective 1, and the subjectivity involved in determining that meeting the OAN in full (470dpa) or the figure suggested in the DCLG methodology in 2017 (645dpa) would be harmful to objectives 6 (to support economic growth which is inclusive, innovative and sustainable), objective 4 (to reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities), or indeed objective 15 (to protect and enhance landscape character). As set out in our reps on the Reg 19 Plan, the assumption appears to be more houses equals more land take and thus increased harm to the local environment.

1.1.29 A review of section 5.11 of Vol 2 of the SA would suggest that there are many sites within the district that perform better than the proposed Garden Village at South Godstone in SA terms. This begs the question should/ could a higher housing number be accommodated. Is there any greater harm given the chosen approach?

10
Are the assumptions in the SA fair and reasonable or is it a retrofitted approach adopted to support the councils preferred strategy – that of a Garden Village, with minimal growth within the tier 1and 2 settlements.

1.1.30 As set out in our reg 19 reps the SA fails to address the extent to which more housing would help address the districts acute affordable housing need and affordability ratio. Providing more housing, especially affordable housing, and improving the affordability ratio will help key workers find accommodation in the District, thus reducing in-commuting and improving existing services/ business access to labour – thus enhancing the economic viability of the District and reducing the need for travel. In this regard we note that para 8.1 (bullet point 3) of the Reg 22 Plan highlights that fact that Tandridge is ranked 61st of 379 local authorities in the UK Competitiveness Index, the lowest of the 11 districts and boroughs in Surrey. It goes on to indicate that competitiveness relates to the economic performance of a local authority area in terms of how attractive it is to businesses and firms. It also measures the economic welfare of individuals and how much business success increases the economic value and wealth for its residents. The districts poor standing relative to its peers is we believe in part a factor of its historically low levels of housing growth and thus poor affordability. Increased housing will help to improve the district’s economic standing. Furthermore, as the SA highlights in table 3 of volume 1: “the construction industry plays a significant economic and employment role within the area, therefore the objective will contribute to building a strong economy. High quality residential areas also create attractive areas for businesses to locate to”

1.1.31 It’s clear from section 5.11 of the SA that more housing does not necessarily harm the local landscape or place a strain on local services.

1.1.32 The SEA, and in particular the selection of options, appears to be based upon the premise that meeting need will inevitably cause environmental and other harm. The SEA has in our opinion failed to consider reasonable alternatives to the restricted growth option selected and the benefits this could bring about. As a result the SEA is deficient.

1.1.33 Whilst the HELAA has provided an overview of what is developable (see response to matter 3), TDC have, through the SA simply failed to assess the merits of further allocations / Green Belt releases in the context of the different spatial options and associated impact on the affordability issues in the district, which results in a Plan approach that is inconsistent with national policy, unjustified and not positively prepared i.e. unsound. The affordable needs of the area suggest that TDC need to do more in the way of housing provision. In addition, they amount to overriding Exceptional Circumstances to warrant the alteration of Green Belt boundaries. The HELAA indicates there are ample sites to meet the need and the SA suggests in section 5.11 that there are many sites that are less environmentally sensitive and more readily deliverable (see Matter 2 Statement) than the chosen approach, such that there is, if TDC had chosen to consider it, a reasonable alternative option that provides for greater growth. Given the imperative to meet OAN, it was unreasonable of the LPA to fail to consider such an approach given the acute housing needs of the area.
1.1.34 Generalised and, in some cases, questionable assumptions have been made about the impact of higher levels of housing provision, relative to the benefits it could bring about. Furthermore the SA fails to consider the extent to which any issues that have prevented a site being bought forward might be resolved or mitigated through for example highways and footway improvements, sewerage infrastructure improvements, the provision of land for new doctors surgeries/ funds towards the expansion of existing surgeries, the selective development of parts of sites, the incorporation of green buffers and other measures.