HEARING STATEMENT

On Behalf of Ashill (Respondent ID 996072)

Matter 1

September 2019
1.0 Introduction

1.1 On behalf of our client, Ashill, CBRE is instructed to submit Hearing Statements to the Tandridge District Council ‘Our Local Plan’ 2033 (July 2018) (hereafter ‘the Plan’).

1.2 Ashill has an interest in three sites within Tandridge that they have been promoting through the Local Plan process. These include:

- GOD 001 – Godstone Reservoirs
- CAT 019 – Caterham Reservoir
- OXT 021 – Land west of Red Lane. This is Draft Site Allocation HSG13.

1.3 As discussed in more detail within the five Matter Statements (1, 2, 3, 4, 6), both omission sites (GOD 001 and CAT 019) are strategically located and offer a solution to the identified issues of soundness with the submitted plan. A separate Matter Statement has been provided in respect of the Inspector’s Questions for Site HSG13 which is allocated in the Plan.

1.4 GOD 001 and CAT 019 are both owned by Surrey and East Surrey Water, a major local employer within the wider area. Land west of Red Lane (OXT 021) is being jointly promoted by the two landowners, Surrey County Council and Ashill.

1.5 Ashill have previously made representations during the Our Local Plan: 2033 (Regulation 19) August 2018 and Local Plan: Garden Villages Consultation 2017. The representation references for this submission is 996072.
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**SUSTAINABILITY APPRAISAL**

**QUESTION 1.2**

*Is the Sustainability Appraisal (SA) adequate?*

**Response**

2.1 For the reasons set out in response to Question 1.2 and 1.3 the Sustainability Appraisal is not adequate and this should be addressed as part of a Main Modifications consultation on the Plan.

**QUESTION 1.3**

*Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?*

**Response**

2.2 In principle the approach and intent of the methodology set out in Table 3, Page 102 of Document MD4 represents a sound approach to the SA.

2.3 However, upon further analysis it is apparent that the subsequent assessment of options against the proposed methodology is not robust. This is most clearly seen in the approach taken in the relationship between SA Objective 1 (Housing) and other SA Objectives including Reducing the Need to Travel (SA 4), Supporting Economic Growth (SA 6) and Providing Employment (SA 7).

2.4 As identified by the Council, the positive relationship between these SA Objectives is set out in Table 4, Page 109 of Document MD4 and is included below.

2.5 Whilst through Table 4 below the Council acknowledge the positive relationship between these SA Objectives, in assessing the approach to housing numbers (see 2.6 below) this consistency in methodology is not applied.

<table>
<thead>
<tr>
<th>Table 4: Compatibility of SA Objectives</th>
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Source: Document MD4, Page 109

**Transport, Economics and Employment**

2.6 The Sustainability Appraisal, as it relates to housing numbers, includes an overly simplified assessment of the benefits of housing development that fails to acknowledge its relationship
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with wider transport and economic/employment considerations (this denoted through the ‘Red’ assessment below).

<table>
<thead>
<tr>
<th>Table 11: SA of Overall Housing Number</th>
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<tbody>
<tr>
<td>DCLG Housing Figures</td>
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<tr>
<td>Objective Assessed Need (OAN)</td>
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<td>Maximum Potential in Light of Background Evidence</td>
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<td>Continuation of Core Strategy 2008 Equivalent</td>
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Source: Document MD4, Page 157

2.7 The simplified assessment is evident at Page 157 of the Sustainability Appraisal in which it is stated:

‘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.’

2.8 In planning for a sufficient number of new homes to improve the affordability of housing, the ability for people to work and live locally is also improved. This has important wider considerations in reducing outflows of labour which can (1) result in increased capacity on local strategic road networks as people have to travel further for jobs and (2) reduce the incentive for new employment opportunity to emerge due to the constraint on the availability of a local work force.

2.9 This position is reflected by the Council on Page 76 of the Housing Topic Paper which states:

‘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. This relationship has also worsened to a greater extent than in comparable areas.’

2.10 In addition, as stated in ‘Balancing Homes and Employment’ (November 2016) by ARUP:

‘The findings also confirm that the Council should consider how housing affordability and land availability is managed to maximise the ability of workers to live in the district. In Tandridge, the plan objectives seek specifically to provide a better balance of homes and jobs by offering choice and by supporting and retaining businesses.’

2.11 This is identified as a particular issue for Tandridge. As stated at Page 64 of MD4:

‘Across a number of key measures Tandridge is performing poorly in relation to other Surrey districts & boroughs. Within the key GVA (Gross Value Added) indicator Tandridge is the second lowest across all local authorities within both Coast to Capital and Enterprise M3 Local Enterprise Partnership areas (out of twenty-nine in total).’

2.12 Whilst the Council’s evidence base does include commentary on the role that improved affordability can have in allowing more localised working, the results of this have not fed into the Sustainability Assessment that has informed the overall plan target. The consequence of the approach is that housing growth targets that deliver in excess of (OAN) and thus seek to
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improve housing affordability through increased supply, are not attributed as delivering wider benefits for the objectives of the Plan.

2.13 The NPPF (2012) is clear at Paragraph 7 that there are three dimensions to sustainable development: economic, social and environmental. More fundamentally in the context of the approach taken by the Council Paragraph 8 notes that the roles (of Sustainable Development) should not be undertaken in isolation, because they are mutually dependent.

2.14 Thus, whilst the Table 3 Methodology correctly identifies the interdependencies between these competing objectives, the application disproportionately underestimates the contribution housing makes to economic and social development.

2.15 The consequence of this for the Plan and its development is that options associated with high housing targets appear to perform significantly less well against the Plan’s objectives than alternative options.

QUESTION 1.4

Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

Response

Approach to Alternative Housing Target

2.16 The justification provided on Page 159 of Document MD5 is insufficient. In justifying lower residential numbers in the Plan it is stated:

Even economic objectives (6&7) seem likely to be negatively affected by the OAN and MHCLG numbers. This is because the growth rate would be unsustainable, negatively affecting the balance of local homes and jobs, leading to a greater level of out-commuting. 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.’

2.17 The above represents a misleading argument. If additional sites are not allocated in the Plan (following a higher housing target) then it could feasibly create a pressure on employment land. However, options for the OAN, MCHLG or similar housing target would be produced alongside a plan-led approach identifying which sites were suitable for residential development. Equally, development management policies would ensure that employment land was protected in accordance with the NPPF. In addition, development could be phased to ensure that sufficient employment land is provided to maintain a balance against housing delivery. Such an approach could ensure that the required homes could be delivered without undermining the employment objectives of the Plan.

Approach to Housing Distribution

2.18 Within the work undertaken to inform the SA insufficient evidence is provided to why only development options associated with a large urban extension/ garden village were considered post the 2015 SA. As set out in Paragraph 5.8.1 of Document MD5:

‘The SA is an iterative process and the 2015 options were based upon the understanding of the realistic options and evidence available at that time. However, the numbers within the 2015 options cannot be considered directly comparable to subsequent options 7a to 8b. The latter are based upon a more detailed and well-developed evidence base.’
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2.19 All Options 7a – 8b in the 2018 SA include the development of a Garden Village. From the evidence base provided in the SA process there is insufficient reasoning as to how this has been considered against an alternative distribution for development that could result in further development in Tier 1 and Tier 2 settlements.

**Approach to Alternative Sites Assessment**

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Source: Document MD4

2.20 The above is an extract from the 2018 Sustainability Appraisal which provides commentary regarding the factors that have influenced whether a site is included within the Plan. GOD 001 was rejected on the basis of landscape and ecology. However, as can be seen from the above extract, there is very little difference between GOD 001 and GOD 010 with regards to other factors.

2.21 Both GOD 001 and GOD 010 are Green Belt sites. GOD 010 (allocated) is also part located within the Surrey Hills Area of Outstanding Natural Beauty and the northern access is surrounded by Ancient Woodland.
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2.22 In the assessment of GOD 001 it is dismissed as a reasonable alternative on landscape and ecology grounds whereas GOD 010 is included as an allocation. Such an approach is not sound as it is not justified or consistent with the NPPF. With respect to Paragraph 115 of the NPPF there is a notable absence for how the LPA has exercised ‘great weight’ in the protection of development in the AONB.

2.23 Paragraph 115 of the NPPF states that AONBs ‘have the highest status of protection in relation to landscape and scenic beauty.’ It continues at Paragraph 116 to state considerations under which development in the AONB should be permitted. As part of the assessment exercise consideration should be given to ‘the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way.’

2.24 GOD 001 represents an alternative to developing in the AONB. The reasons for rejection of GOD 001 (ecology and landscape) are not absolutes (i.e. they are not covered by Footnote 9) but can be addressed through mitigation policies and enhancement. GOD 001 offers the opportunity for biodiversity improvements and the dense woodland belt surrounding the site on all sides and site contours offers a natural screening to the site that GOD 010 does not benefit from.
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2.25  Paragraph 6.1.3 of the SA for the Sites Consultation October (2016) (Document SSHA16) stated as a proposed Next Step that:

‘Detailed masterplanning will need to be undertaken to identify whether it would be possible to mitigate potential adverse effects for certain sites through detailed layout and design. In particular, the potential to mitigate the anticipated adverse effects on the local landscape of sites located on the urban edge.’

2.26  GOD 010 includes scope to mitigate the proposed reasons for rejection. A more thorough mitigation assessment process is required to ensure that all potential sources to meeting the OAN has been fully explored.

2.27  In respect of soundness, it is not consistent with the NPPF for a site to be allocated that would result in development in the AONB ahead of other available sites. A masterplanning exercise undertaken consistent with the principles of the NPPF would identify GOD 001 as the reasonable alternative for allocation.
3.0 Main Modifications Required to Matter 1

3.1 In order to address the soundness issues identified in response to Matter 1 the following amendments are required to the Plan:

1. The SA needs to be reviewed to ensure that economic development is given an equal consideration to environment and social considerations. The outcome of this exercise will demonstrate the mutual benefits achieved through a higher housing target.

2. GOD 010 should be reassessed alongside other sites in Godstone to ensure that the Sustainability Appraisal is consistent with the NPPF.