Land at Godstone Road/Longsdon Way, Caterham

Tandridge Local Plan – EiP Statement Matter 2
1. MATTER 2: PROVISION OF HOUSING

1.1 This statement has been prepared by Boyer on Behalf of Croudace Homes Limited, in response to the Inspector’s Initial Matters, Issues and Questions set for Matter 3 in relation to the provision of housing proposed in the Local Plan

A. Calculation of the Objective Assessed Need for Housing (OAN)

Issue: Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?

1.2 No. The Tandridge Forum, of which Croudace Homes is a member, has prepared a detailed commentary on the proposed OAN. We would refer the Inspector to the Forum’s submission on this issue. However, it is clear that (in this respect) the Plan fails the tests of soundness by virtue of it not being positively prepared, justified or effective. The Plan is also inconsistent with Paragraph 14 of the archived National Planning Policy Framework (NPPF, 2012) and the Planning Practice Guidance (PPG) as applicable to the examination of the Plan.

B. The Housing Requirement

Issue: Is the plan positively prepared and justified given that the Plan provides for 6,056 homes in the Plan period, against the OAN of 9,400 as set out in the Publication Plan and the OAN of 7,960 set out in the document Updating the Objectively Assessed Housing Needs of Tandridge (HNS5)?

Q2.7. Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework?

1.3 No, the Plan’s failure to meet the identified OAN is not justified. The Tandridge Housing and Economic Land Availability Assessment (‘HELAA’) concludes that there are sufficient deliverable and developable sites to provide 22,460 homes within the district. However, proposed Local Plan Policy TLP01 ‘Spatial Strategy’ identifies a capacity-based housing target of only 6,056 homes. This figure will not meet the identified OAN.

1.4 Paragraph 14 (of the archived NPPF) indicates that a presumption in favour of sustainable development is a golden thread that runs through both Plan-making and decision-taking. The Framework is clear that, for Plan-making, this means positively seeking opportunities to meet the development needs of the area, meeting objectively assessed needs, unless;

“– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

– specific policies in this Framework indicate development should be restricted.”

1.5 It is recognised that much of the Tandridge District is washed-over by the Green Belt, which is defined as a restricted designation at NPPF (2012) Footnote 9. However, NPPF paragraph
83 makes provision for Green Belt boundaries to be reviewed and altered, through a Local Plan, where exceptional circumstances have been demonstrated to justify this.

1.6 At paragraphs 14.1 to 14.3 of the Plan, the Council argues that exceptional circumstances exist to release land from the Green Belt, and a number of Green Belt releases are proposed to facilitate the meeting of housing need and address worsening levels of affordability.

1.7 However, no coherent explanation is provided to explain why the identified OAN cannot be met it full. As noted, the HELAA identifies land to deliver 22,460 homes and whilst not all sites promoted will be suitable, it is not accepted that the Plan could not identify land to provide an addition 1,900 dwellings and therefore meet the (now) proposed OAN.

1.8 The Plan essentially seeks to fall back on the Green Belt as a justification for not meeting identified needs. However, as we note below, the Plan does not even go so far as to propose the release of sustainable sites, within Green Belt, which the Green Belt Assessment confirms make no contribution to the identified purposes of the Green Belt.

1.9 As such, the Plan (as presently configured) cannot be regarded as being positively prepared or justified, nor is it consistent with national policy. The Plan can only be made sound if more sites, which have been identified as deliverable or developable, are allocated for development. This requires the release of additional land from the Green Belt.

Q2.8. Have all realistic options for meeting the OAN within Tandridge in full been exhausted?

1.10 No. As indicated above, the submission Plan accepts, at paragraph 4.3, the need to consider Green Belt land for development because of the lack of non-Green Belt housing supply, the Government’s housing agenda and the drive for sustainable development.

1.11 Therefore, the question of whether all realistic option for meeting the OAN have been exhausted must be considered in the context of the Council agreeing to the principle of Green Belt release and whether, having agreed that principle, there are Green Belt sites that are realistic options for release and development that have not been fully considered.

1.12 We consider the limitations of the Council’s approach to Green Belt release in our Statement for Matter 4. The key point is that, as a matter of principle, it is vital that sites judged to fulfil no Green Belt purpose in the Council’s Green Belt Assessment (GBA) are fully considered as possible options to meet the Council’s OAN.

1.13 It is particularly important to consider sites that the GBA judges to serve no Green Belt purpose that are located at the Tier 1 settlements. Paragraph 17.8 of the Submission Plan states “The Spatial Strategy identifies our most built up Urban (Urban - Tier 1) settlements as areas where development will be focused and where it can be supported by an existing framework of facilities and infrastructure.” Policy TLP06 then identifies these settlements as “a focus for development.”
1.14 Further importance is attached to sites which serve no Green Belt purpose at the Tier 1 settlements that are particularly well related to the urban area and score highly as sustainable locations for development.

1.15 We are concerned that sites which serve no Green Belt purpose, that are located at Tier 1 settlements and are well related to the urban area, services and public transport have not been fully considered for release from Green Belt and as potential development allocations.

1.16 Where such sites have been part of the Green Belt Assessment and Sustainability Assessment, there has been a tendency to make adverse judgements about their suitability for development based on the existence of a site constraint without assessing the importance or weight of that constraint or the ability to mitigate or overcome it. In some cases, the constraint is not merely capable of being addressed but there is potential for biodiversity enhancements in the relevant subject area.

1.17 We are particularly concerned about the way in which the Council has ruled out sites based on the judgement that they are ecologically unsuitable, even where the site in question carries no formal nature conservation designation and where there is the potential for ecological enhancements to be delivered alongside an appropriate residential scheme.

1.18 There are a number of examples where sites, which are clearly realistic options to help meet the Council’s OAN, have been ruled out of consideration by the Council's GBA, SA and site selection processes. The site circumstances described above, which apply to our client’s site at Caterham, provide the clearest possible demonstration that all realistic options for meeting the OAN have not been exhausted. Sites that fall within the criteria we have identified are compelling options for Green Belt release and allocation for development.

1.19 Accordingly, in the absence of modifications that propose additional allocations and additional Green Belt releases, the Plan cannot be considered as positively prepared, justified or consistent with national policy.

Q2.9. What are the consequences of not meeting the OAN within the HMA for delivering a wide choice of high-quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities which meet the needs of different groups in the community?

Q2.10. Would and/or where would any unmet housing need arising in the Tandridge HMA during the Plan period be met?

1.20 The Tandridge Forum, of which Croudace Homes is a member, has prepared detailed submissions that set out the consequences of not meeting the OAN in the terms specified in the Inspector’s question 2.9 above. We therefore refer the Inspector to the Forum’s submission on this issue.

1.21 It is clear from our response to question 2.8 above that housing need not currently met by the submission Local, can be addressed by additional housing allocations, and not least from sustainable sites at the Tier 1 settlements that fulfil no Green Belt purpose.
1.22 We consider that unmet housing needs can only be addressed by such additional allocations in this Local Plan. There is no other practical and feasible option, as adjoining authorities are also failing to meet their own OANs through their own Local Plans as demonstrated in submissions by the Housing Forum. The Plan’s current failure to meet housing needs in circumstances where there is no potential for any unmet need to be provided for at alternative locations outside of the District, means that it cannot be considered positively prepared, justified or consistent with national policy.