Montagu Evans on Behalf of The British Home, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal Society for Blind Children and the Royal National Lifeboat Institution (‘The Charities’) & Welbeck Strategic Land

Written Submission to Tandridge District Council Local Plan Examination

Matter 2: Provision of Housing

6 September 2019

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## APPENDICES

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1.0 RESPONSE TO INSPECTOR’S INITIAL MATTERS, ISSUES AND QUESTIONS: MATTER 2 PROVISION OF HOUSING

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)?

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

1.1 Paragraph 14 of the NPPF states that:

“local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, 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”.

1.2 Footnote 9 of the NPPF clarifies that specific policies that indicate development should be restricted could include land designated as Green Belt.

1.3 Paragraph 83 of the NPPF states that “...Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan” (our emphasis).

1.4 Acknowledging the Green Belt constraints within TDC, with 94% of the District located within it, it is very clear that the Council’s OAN can only be met through the release of Green Belt land. While the Council have undertaken a Green Belt Assessment as part of the Local Plan preparation, very limited release is proposed despite the fact that the Plan as currently drafted makes no attempt to meet its full OAN.

1.5 The perceived harm related to the release of Green Belt land has been used by the Council as justification as to why sufficient land cannot be allocated to meet the identified need and forms the basis of the Council’s argument for significantly lower housing delivery figure of 6,056 dwellings (against an OAN of 9,400) over the Plan period.
1.6 This approach runs contrary to the NPPF which clearly envisages changes to the Green Belt boundary in exceptional circumstances, as set out above. It is considered that the significant unmet housing need within the Plan, particularly given the inability of other local authorities within the HMA to assist meeting TDC’s OAN, would constitute exceptional circumstances in the context of Paragraph 83 of the NPPF that would justify further Green Belt release. The Council’s failure to properly grapple with this requirement means that the Plan is flawed and unsound. Given the inability of adjoining authorities to assist TDC in meeting its OAN, the inevitable consequence of this is to push housing delivery beyond the identified HMA which is again at odds with the NPPF.

1.7 It is therefore clear that the Plan is not consistent with paragraph 14 of the NPPF. The draft Plan also does not accord with the requirements of Paragraph 182 of the NPPF as it is not positively prepared and does not seek to meet the objectively assessed development need. In its current form the draft Local Plan is fundamentally flawed and cannot be considered sound. To rectify this, the solution is to allocate additional land within the Green Belt to meet the identified OAN for the Plan period.

2.8 Have all realistic options for meeting the OAN within Tandridge in full been exhausted?

1.8 Document HNS2 - Tandridge Local Plan 2033 Housing Topic Paper 2019 submitted as part of the evidence base outlines the strategy for delivering the proposed housing figure of 6,056 homes. This includes utilising land within existing built areas, including brownfield land, windfall sites, bringing vacant homes back into use and the limited release of Green Belt land. However, the Council still falls significantly short of the OAN set out within the Publication Plan of 9,400 new dwellings and the OAN of 7,960 new dwellings set out in document HNS5 - Updating the Objectively Assessed Housing Needs of Tandridge 2018.

1.9 Document HNS2 explains the alternatives considered by the Council to deliver additional housing, including the release of more Green Belt land for housing sites in Tier 1 and Tier 2 settlements, more housing sites in rural areas within the Green Belt and the construction of a second garden community. These alternatives were discounted as they were not considered to be realistic or sustainable.

1.10 We disagree with this conclusion. With no other alternatives proposed by TDC to meet their OAN, it is clear that the most realistic and feasible option for the Council to meet their OAN within Tandridge is through the release of additional Green Belt land. This would require a full Green Belt assessment that should seek to identify appropriate locations for alterations to the boundary to allow for additional land to be allocated for housing. In line with the draft Plan spatial strategy, this should focus on land around Tier 1 and Tier 2 settlements.
2.9. 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?

1.11 By not meeting the OAN within the HMA, this will result in a significant undersupply of housing across TDC over the plan period. This undersupply of both market and affordable new homes will restrict opportunities for homes ownership in the HMA and cause overspill of housing need into adjacent boroughs. The unmet housing need and resultant undersupply will drive up house prices within TDC, further restricting opportunities for home ownership and reducing affordability.

1.12 While the allocation of a Garden Village within South Godstone in the draft Local Plan is supported in principle, its delivery will result in the concentration of housing growth to the south of TDC in the medium to long term. This spatial approach to housing delivery is disproportionate and will further intensify undersupply issues within the north of TDC. To ensure equitable and proportionate housing delivery within TDC across the plan period, additional land should be allocated for housing in the north of the district, in line with the Council’s preferred strategy and seeking to meet the full OAN.

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

1.13 Within the draft Local Plan, TDC have not identified any land that would facilitate for unmet housing need in the district over the Local Plan period. The resultant impact of this would be that housing need is pushed into adjacent Local Authorities who do not currently account for TDC need within their own OAN (HNS13 - Defining the Housing Market Area for Tandridge Updated 2018). This would add additional strain and pressure on housing need requirements in these adjacent boroughs. A sound approach would have been for TDC to effectively work with adjacent boroughs to ascertain whether any unmet need could be delivered outside of the district. However, we know through the Duty to Cooperate responses that the adjoining authorities are unable to assist in this regards.

1.14 In accordance with the NPPF, the approach that should be taken by TDC is to allocate sufficient sites within their HMA to meet their own OAN.

C. The Overall Supply of Housing

Issue: Is the proposed supply of housing for the Plan period realistic?

2.11. Does the housing trajectory set out in the Housing Topic Paper (HNS2) provide a sound basis for meeting the identified housing need?

1.15 Housing Topic Paper HNS2 states that “…the OAN figure of 398 dwellings per year over the 20 year plan period is both undeliverable and unsustainable in terms of its adherence with other policies in the NPPF” (paragraph 422). We note that the 7,960 total housing figure used by TDC reflects the 2016...
household projections and not the OAN of 9,400 dwellings identified within the Council's 2015 SHMA.

1.16 The Council’s proposed housing trajectory is predicated on delivering 6,056 dwellings over the Local Plan period, which equates to an annualised average of 303 dwellings per annum (dpa). This is a shortfall of 95 dpa when considered against the updated OAN, and a shortfall of 167 dpa when considered against the OAN within the 2015 SHMA.

1.17 In the six year period between March 2013 and March 2019 housing completions for TDC were 1,705 dpa. This constitutes a cumulative shortfall of 112 dwellings when considered against the Council’s own target of 303 dpa and a shortfall of:

- 683 dwellings when considered against the annual requirement of the updated OAN of 7,960 dwellings; and
- 1,115 dwellings when considered against the annual requirement of the OAN of 9,400 dwellings within the 2015 SHMA.

1.18 Critically, TDC do not propose to meet their identified housing need within the housing trajectory set out in Housing Topic Paper (HNS2), and notwithstanding the significant shortfall of delivery set out above, the Council’s approach cannot be considered sound as it does not seek to meet the identified need and does not accord with the requirements of the NPPF. Furthermore, it is simply making a critical error in a Plan led system.

2.12. Is the housing trajectory realistic and deliverable in terms of its components and are there any threats to delivery?

1.19 Notwithstanding that the Council’s proposed housing delivery falls significantly short of the OAN, the housing trajectory set out in document HNS2 is not considered to be realistic or deliverable.

1.20 It is noted that the Housing Topic Paper HNS 2 contains 2 different housing trajectories provided at Appendix 3 and Appendix 4. Appendix 4 is an updated housing trajectory which reflects the Council’s position from July 2018 - November 2018. However this change has not been formally made to the draft Local Plan as it would constitute a main modification.

1.21 The figures within the housing trajectory at both Appendix 3 and Appendix 4 of document HNS2 are considered to be inaccurate and do not reflect the latest available information as published within TDC’s Housing Delivery Test Action Plan (HDTAP) (August 2019).

1.22 Firstly, the total estimated completions for the year 2018/2019 within Appendix 3 are 425 dwellings, with 376 of these coming from existing planning permissions (up to expiry). Appendix 4 increases the estimated completions for the same year to 504 dwellings with 358 of these coming from existing planning permissions. The HDTAP August 2019 clarifies that the actual total completions for 2018/19 was 244 dwellings.
This is a significant shortfall when considered against the estimated figure the Council has used to inform their trajectory.

1.23 The estimated completions from planning permissions within Appendix 3 used for years 2019/20 and 2020/21 of 384 dwellings and 294 dwellings is not considered to be realistic when compared against the Council’s track record of completions in the preceding 5 years within TDC. This is set out below:

- 2014/15 – 142 dwellings;
- 2015/16 – 322 dwellings;
- 2016/17 – 228 dwellings;
- 2017/18 – 332 dwellings; and
- 2018/19 – 244 dwellings.

1.24 The housing trajectory assumes that the existing permissions that are in place will all come forward at a completion rate significantly higher than that delivered in previous years, with no allowance for existing planning permissions not being built out due to permissions lapsing or changing economic circumstances impacting the viability of sites coming forward.

1.25 On this basis, clearly the Council’s trajectory for years 2019/20 and 2020/21 cannot be considered deliverable or realistic.

1.26 The Council’s assumption that the proposed garden village at South Godstone will start to deliver 200 housing completions per annum from 2026 and 1,400 new dwellings over the Plan is not considered to be realistic. There are significant obstacles that threaten the delivery of this strategic site which must be taken into account and reflected within the trajectory.

1.27 From experience, the earliest a garden village will start to deliver residential units is 7-8 years from a standing start, assuming there is a Local Plan allocation in place. Turning to Tandridge’s draft Local Plan, there isn’t a proposed formal allocation that seeks to identify a specific site where the garden village will be located, rather a broad location defined as an ‘area of search’. At this stage, there is no certainty where exactly in South Godstone the garden village will be located.

1.28 The draft Local Plan states the defined boundary of the proposed garden village will be established through an Area Action Plan, alongside the development principles. It is not envisaged that this Action Plan will be prepared, consulted upon and adopted until after a Local Plan is adopted. This process is likely to take in excess of 2 years following adoption of a Local Plan. There is also the risk that the Local Plan and proposed Area Action Plan would be subject to legal challenge, which would add further delay.

1.29 In addition, within the ‘area of search’ identified within the draft Local Plan, there are a large number of different landowners, all with competing interests. We understand that Bonnar Allen, previously the land promoter for a large amount of land holdings in South Godstone has gone bust.
1.30 Without a single main land owner or land promoter in place to drive forward a garden community approach, there is likely to be significant delay in a site coming forward. If the Council were to seek to acquire the land through CPO, this would most likely be resisted by landowners.

1.31 With this in mind, there is little likelihood of a forthcoming planning application for a garden village until all of these issues are resolved. Even then, the planning application will mostly likely be for outline planning permission with reserved matters applications for specific phases or parcels of land following that. From experience, it would take at least 2 years for the first reserved matters application to be approved from submission of an outline application.

1.32 Considering all of the above factors, we do not consider it realistic that the garden village would start to deliver housing by 2026/27 as set out within the housing trajectory. It is our contention that a starting point of 2029/30 would be a more realistic assumption.

2.15 In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence of viability?

1.33 We note that the infrastructure costs that are used to inform the high level viability assessments submitted as part of the evidence base are based largely on input from third parties. We would question the robustness of this information and request clarification on the evidence that has been used to inform these costs as they form the basis for the viability assessments that have been undertaken, and any changes in the estimated costs could impact deliverability.

1.34 Further, document INF1 - Tandridge District Infrastructure Delivery Plan 2019 states that a significant quantum of infrastructure required to support the proposed housing growth is reliant on external funding (i.e. Housing Infrastructure Fund). There is no clarification on the extent of the proposed funding from these external sources and the associated timescales for when funding can expect to be received. This begs the question over deliverability of the housing development proposed if external funding were to not be forthcoming.

2.16 Given that the proposed South Godstone Garden Community is intended to deliver around 1,400 new homes in the Plan period and the details of the development would be considered by an Area Action Plan (AAP), would it be effective to include within the Plan a Policy which commits the Council to a review of the Plan if the AAP is not adopted by a specified date in order to sustain the supply of housing?

1.35 Without prejudice on our position that the Plan is unsound as currently drafted, were it to be found sound it would be critical that there is an early review of the Plan to ensure the supply of housing is maintained should there be a delay to the adoption of an AAP. The Council relies on the garden village delivering 23% of their proposed housing delivery of 6,056 dwellings over the plan period. While we have already raised significant doubts about the ability of the garden village to deliver residential
units by 2026/27, it is a fundamental site that underpins the estimated housing trajectory and any delay to the AAP would have a significant impact on overall housing trajectory and delivery.

1.36 An early review mechanism should not be used as an excuse by the Council to not meet their OAN at this stage. To proceed on the current basis of failing to meet the OAN by a significant shortfall would not be a sound approach that would be in direct contravention to the NPPF.

D. Five Year Housing Land Supply

Issue: Would the Plan secure a five year supply of deliverable housing sites?

2.17. Will the Plan provide for a five year supply of deliverable housing sites on adoption?

1.37 We do not consider that the Plan will provide for a five year supply of deliverable housing sites on adoption of the Local Plan. Critically, the housing figures within Appendix 3 of document HNS2 which the Council have used to inform their calculation are incorrect.

1.38 Within their calculation, TDC use a housing shortfall figure of 112 dwellings from the period of 2013-2019. This shortfall figure is in fact 294 dwellings when using the latest available evidence as set out within Appendix 1 of the Housing Delivery Test Action Plan (HDTAP) (August 2019). On that basis, the 5 year requirement plus the shortfall for TDC is 1,809 dwellings.

1.39 We consider that the use of a 5% buffer within the five year housing land supply calculation is not justified or robust and that a 20% buffer should be adopted in line with Paragraph 47 of the NPPF. This is set out in more detail in response to questions 2.18 and 2.19.

1.40 When the five year housing land supply is calculated using the correct shortfall figure of 294 dwellings and applying an appropriate 20% buffer, the land supply is 4.3 years when using the Sedgefield Approach and 4.8 years when using the Liverpool approach.

1.41 Further, when factoring the correct shortfall of 294 dwellings into a 5 year housing supply calculation and applying a 5% buffer (which is used by the Council), the land supply is 4.9 years when using the Sedgefield Approach. This is considered the most appropriate approach to be used as it ensures that any shortfall from previous years is dealt with in the short-term and does not seek to push past shortfalls beyond this period.

1.42 On either basis, it is clear the Council would not be able to demonstrate a five year housing land supply upon adoption of the Local Plan and that more sites should be allocated for housing now to make up for this shortfall in the immediate short-term and enable the Council to demonstrate a 5YHLS. The implications of this are considered below.
2.18. In the context of paragraph 47 of the Framework, is it justified to apply a buffer of 5% within the calculation of the five year supply?

1.43 Paragraph 47 of the NPPF states that where there has been a persistent under delivery of housing, local planning authorities should adopt a buffer of 20% to their five year housing land supply.

1.44 Notwithstanding the OAN, the draft Local Plan sets a housing delivery rate of 303 dwellings per annum. The housing trajectory within the table presented at Appendix 3 of document HNS2 is not an accurate reflection of the Council’s housing delivery since the start of the plan period.

1.45 Based on the latest available evidence set out within the HDTAP (August 2019), TDC have consistently failed to meet their annual housing target of 303 dpa. Appendix 1 of this statement includes an extract from the HDTAP which states that the delivery of housing completions within TDC since 2013 is as follows:

- 2013/14 – 256 dwellings;
- 2014/15 – 142 dwellings;
- 2015/16 – 322 dwellings;
- 2016/17 – 228 dwellings;
- 2017/18 – 332 dwellings; and
- 2018/19 – 244 dwellings.

1.46 Whilst the Council has met its housing target on two occasions over the last 6 years looking at it cumulatively over this period the total provision equates to a total of 1,524 dwellings over a 6 year period which, when compared to the housing requirement for the same period of 1,817 dwellings, results in a shortfall since the start of the plan period of 294 dwellings.

1.47 This demonstrates a track record of persistent under delivery of housing since the beginning of the local plan process and is considered to constitute a sound basis for applying a 20% buffer to the 5YHLS figure. The proposed application of a 5% buffer is not therefore justified in the context of Paragraph 47 of the NPPF.

2.19. What are the implications of the Housing Delivery Test for the five year supply of housing after the Plan is adopted, having regard to the application of the appropriate buffer as set out in paragraph 73 of the revised updated National Planning Policy Framework 2019?

1.48 Whilst it is accepted that the Local Plan is currently being assessed against the NPPF 2012, assuming it were to be found sound and adopted in its current form any future applications would immediately fall to be determined against the latest version of the NPPF (2019).

1.49 Paragraph 73 of the NPPF 2019 states that:

“...The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
a) 5% to ensure choice and competition in the market for land; or
b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply”.

1.50 Footnote 39 of the NPPF 2019 provides further clarity on what constitutes ‘planned supply’, stating, “From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement”. It is clear, therefore, that if the HDT indicates delivery is below 85% for the preceding 3 years then a 20% buffer should be applied. Applying a 20% buffer exacerbates further the Council’s shortfall as already discussed.

1.51 Furthermore, it is therefore inevitable that the Council will not meet its HDT and its 5 year housing land supply will at that point be considered out of date for the purposes of paragraph 14 of the NPPF as clarified by footnote 7 of the NPPF 2019.

1.52 Effectively therefore the Local Plan will do precisely what it is meant to avoid and open up the Council to speculative applications, including applications on Green Belt sites, that would fall to be determined against paragraph 14 of the NPPF.

1.53 We would add in that there is an inherent tension between more regular Local Plan reviews and such matters as Green Belt release. One of the key characteristics of the Green Belt is its permanence, which by definition is:

“lasting or intended to last or remain unchanged indefinitely.”

1.54 It is precisely this reason that the NPPF requires any changes to the Green Belt to be made through the preparation or updating of plans that are fully evidenced and justified. This is why it is critically important to ensure that the Council’s evidence base is full and justified and it does not simply paper over the cracks. This is not a sound approach to proper Plan making especially where it firmly remains a key objective of the Government to significantly boost the supply of homes.

1.55 It is therefore critical that TDC seek to meet their OAN now as part of the emerging Local Plan. The logical approach to doing this would be through a comprehensive Green Belt review and the controlled release of land in the most sustainable and appropriate locations, such as Tier 1 and Tier 2 settlements, as per the settlement hierarchy set out at Policy TLP06 of the draft Local Plan.
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). The figures may be slightly different to TLP01 due to rounding.

### Table: Housing Trajectory


- **Completions**: 6,057
- **Permissions (up to expiry)**: 1,870
- **Windfall**: 435
- **Garden Community**: 1,400
- **Tier 1 Settlement Sites**: 759
- **Tier 2 Settlement Sites**: 548
- **Other Supply (includes empty homes figure)**: 336

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.
Appendix 2.0
Appendix 4 of Document HNS2
### Appendix 4: Housing Trajectory with Updated Information and Accelerated Delivery of Garden Community

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**Notes:**
- Data reflects completions and permissions up to the specified year.
- Figures may include estimates and projections for future years.
Appendix 3.0
Appendix 1 of Tandridge Housing Delivery Test Action Plan (HDTAP) (August 2019)
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<th>Garden Community</th>
<th>Town Centre Initiatives (CMP)</th>
<th>Urban Capacity Sites (UCS)</th>
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Appendix 1

The table below indicates the proposed Local Plan: 2033 housing trajectory that is featured within the Five Year Land Supply and Housing Monitoring Supporting Paper.