HEARING STATEMENT PREPARED ON BEHALF OF NUTFIELD GREEN PARK FOR THE TANDRIDGE DISTRICT COUNCIL EXAMINATION OF ‘OUR LOCAL PLAN: 2033’

REPRESENTOR 1181902

MATTER 2: THE PROVISION OF HOUSING

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1. Introduction

1.1 Following the issue of the Inspector's Initial Matters, Issues and Questions (Document ID/5 V3) for the Tandridge District Council 'Our Local Plan: 2033' (Publication version July 2018) on behalf of Nutfield Green Park hearing statements have been prepared in respect of Matter 2, Matter 3 and Matter 4. This document provides the response to the questions raised under Matter 2 – The Provision of Housing.
2. **A: Calculation of the Objectively Assessed Need for Housing (OAN)**

**Question 2.1**

2.1 At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.

**Question 2.2**

2.2 Our Local Plan: 2033 is being assessed under the transitional arrangements of the NPPF 2018 where it is stated at Annex 1 Paragraph 214 that ‘*The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019*’. The appropriate guidance at this time was the housing and economic development needs assessments dated March 2015. This guidance document referred to the 2012-2037 Household Projections which were published on 27 February 2015 and were considered the most up to date estimate of future household growth. It stated that the local needs assessments should be informed by the latest available information. The 2016 based household projections were published on 20 September 2018 and these projections have been used by Tandridge District Council to produce an updated Objectively Assessed Need for Housing (OAN) (Document HNS5).

2.3 Since the 2016 based projections have been released it has been determined that the 2016 based housing projections would not meet the Government objective of 300,000 new homes across England. On this basis the Government have updated

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the Housing and Economic Needs Assessment published in July 2019\(^2\) and it states that:

> ‘Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.’

**2.4** As the plan is being assessed under the transitional arrangements it is not necessary for Tandridge District Council to use the standard method in the NPPF to determine the housing need in the District. However, the position of the Government does call into question the validity of using the 2016 based housing projections to determine housing need.

**2.5** Even if the 2016 based projections are considered appropriate by the Inspector, Our Local Plan does still not propose to meet the OAN and will underdeliver on housing with consequent impact on those needing to buy or rent homes in the area.

**Question 2.3**

**2.6** At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence

\(^2\) Ministry of Housing, Communities and Local Government (2019) Housing and economic needs assessment
Question 2.4

2.7 At this stage we have no comment on these questions. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.

Question 2.5 and 2.6

2.8 At this stage we have no comment on these questions. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.
3. **B: The Housing Requirement**

**Question 2.7**

3.1 The plan is not justified in failing to meet the full OAN for Tandridge and therefore the plan cannot be found to be sound. There is a national shortage of housing. The Government have a target of the provision of 300,000 new homes per year in England. If every Council underprovides on housing this target will not be met, with serious consequences for household formation, especially for young people and those on low incomes in need of affordable homes. The Government recognises that there will be challenges to providing this level of housing, particularly in areas within the Green Belt, but it is still necessary to construct new homes in order to support the needs of each area. Tandridge District Council needs to meet the full OAN which it has identified but has determined not to provide.

3.2 It is acknowledged in Paragraph 14 of the NPPF 2012 that a Local Plan should meet the OAN unless specific policies in the Framework indicate development should be restricted which includes land designated as Green Belt. As 94% of Tandridge District is land designated as Green Belt the necessary development to meet housing need cannot be undertaken unless land is released from the Green Belt. There is a balance of issues and the imperative housing need in the local area must be taken into account. Weight should be given to schemes such as Nutfield Green Park which will make significant other community contributions.

**Question 2.8**

3.3 Tandridge District Council needs to reassess the options for further housing provision that have already been discounted or give consideration to sites like
Nutfield Green Park, which has only recently come forward, with a determination to provide the number of homes identified in the OAN.

**Question 2.9**

3.4 If the OAN is not met within Tandridge District there will be restrictions to young families gaining access to affordable homes to buy or rent, those wishing to downsize and a continued shortage of affordable homes for key workers. This will inevitably lead to further imbalances in the average age of residents and migration away from Tandridge by younger people. The lack of homes will mean that people will have to live outside the area, and an increased number of people will have to commute to work within the area, causing further pressure on the road and public transport infrastructure. These factors also have a negative effect on the local economy.

**Question 2.10**

3.5 A contribution to unmet housing need could be made by projects such as Nutfield Green Park. Nutfield Green Park is a multi-faceted scheme that proposes meeting local housing need alongside the creation of an outdoor activity park with a visitors centre, eco-café, fitness and well-being centre and associated infrastructure. The proposals are further enhanced by the provision of a state of the art stroke rehabilitation and care facility.

3.6 The proposals for housing within Nutfield Green Park would provide an appropriate and sustainable contribution to the Council’s requirement and through the significant community benefits accruing from the different elements of the scheme, provide a strong case for the test of exceptional circumstances.
3.7 It is envisaged that the housing will meet a range of identified local market needs providing different types and tenures of properties as well as meeting an appropriate affordable housing provision, which will benefit many in the immediate locality by enabling young people seeking to step onto the housing ladder for the first time, and older people wishing to downsize to high quality attractive accommodation to stay within Nutfield. Key worker accommodation could be provided which would work in tandem with the stroke rehabilitation and care facility. The housing would complement the existing housing stock of the village and would seek to blend sympathetically into the village and contribute positively to the sustainability and attractiveness of Nutfield as a place to both live and work. It will promote a pleasant walkable neighbourhood by the creation of a green corridor running parallel to the A25 accessing the activity park and its other facilities. Importantly it would be possible to deliver these locally required homes at an early phase of the plan period meeting immediate need.
4. **C: The Overall Supply of Housing**

**Question 2.11**

4.1 At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.

**Question 2.12**

4.2 In Paragraph 22.3 of Our Local Plan:2033 (Document reference MD1) propose 1,301 homes across 20 site allocations together with the South Godstone Garden Community which is intended to deliver around 1,400 homes during the plan period. At this stage there is no evidence to demonstrate conclusively that the Garden Community is either viable or deliverable. If the Garden Community does not come forward it will exacerbate the considerable shortage of housing in the area. The Garden Community will only provide housing towards the end of the Plan Period hence there is likely to be a considerable shortfall in the delivery of housing in the early part of the plan period and the current need for homes is acute. There are many considerable challenges to successfully bring forward a large scheme like a new community. At the forefront of these is the issue of land assembly, which at South Godstone is fraught with multiple landowners, and the funding and provision of infrastructure which is yet to be detailed as there is no evident promoter who will guarantee delivery of this key element. Without those basic details it is a significant risk to rely on this scheme to provide such a large proportion of the homes required for Tandridge when smaller more immediately deliverable and viable schemes could be brought forward successfully and without delay.
Question 2.13 and 2.14

4.3 At this stage we have no comment on these questions. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.

Question 2.15

4.4 Although Tandridge District Council have secured Government funds from the Garden Communities Programme, these are in part to fund future studies to establish whether the proposed new community is viable and deliverable. The Local Plan process requires a greater guarantee of certainty than has been provided at present that the community at South Godstone can be delivered.

Question 2.16

4.5 At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.
5. D: Five year housing land supply

Question 2.17

5.1 As stated in Section 6 of the Housing Topic Paper (Document reference HNS2) the five year housing supply has been based on the housing numbers that TDC have determined they can deliver rather than based on the OAN. A five year housing supply consistent with the OAN will not be delivered by the Plan. This inability to demonstrate a five year land supply will still leave Tandridge vulnerable to legal challenge by developers. This negates the purpose of having a Local Plan in place as a key objective is for Tandridge to identify and agree through Examination the most suitable sites for housing development, rather than having sites brought forward through the loss of planning appeals. The lack of a five year land supply would render the plan unsound.

Question 2.18 and Question 2.19

5.2 It will be necessary to provide a 5% buffer consistent with Paragraph 47 of the NPPF 2012 to provide certainty of supply. Following the adoption of the Plan it may be necessary to apply a 10% or 20% buffer under Paragraph 73 of the NPPF 2019. The appropriate buffer will depend on the level of housing that is determined necessary during the Examination process.
6. **E: TLP:12 Affordable Housing Requirement**

**Question 2.20**

6.1 At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.

**Question 2.21**

6.2 In order to meet the affordable housing needs of Tandridge District it will be necessary to release land from the Green Belt. The proposed housing at Nutfield Green Park would provide the necessary proportion of affordable housing. Alongside the housing Nutfield Green Park would include an outdoor activity park, visitor centre and café, care home and stroke rehabilitation unit. There is the potential for significant community benefits as a result of the project.

**Question 2.22**

6.3 At this stage we have no comment on this question. We reserve our position to provide a response should it be necessary if the Inspector requests any further written evidence.