Dear Mr Chris Banks,

**RE: EXAMINATION OF TANDRIDGE DISTRICT LOCAL PLAN SUBMISSION OF HEARING STATEMENTS**

On behalf of The Guinness Partnership Ltd and Blackthorn Homes Ltd, we enclose Hearing Statements in relation to the TDC Local Plan Examination relating to the following Matters:

- Matter 2 – The provision of housing
- Matter 3 - The Spatial Strategy
- Matter 4 – Green Belt boundary alterations

Should you have any queries please do not hesitate to contact me on 0207 4466888.

Yours sincerely,

**MARIE JASPER**
Planning Director

Enc. As above
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?

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

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?

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

1. As set in our Matter 3 and 4 Hearing Statements, there is no justified evidence to demonstrate why the District cannot accommodate its full objectively assessed need (OAN), or indeed the OAN of the wider Housing Market Area (HMA) as required by Paragraph 47 of the NPPF.

2. We consider that there are further sites, to accommodate the full OAN within the District. This is demonstrated by the Council’s own HELAA which identifies suitable, available and deliverable sites which have been omitted from the Local Plan for unjustified reasons, in order to constrain the quantum of development in the District. This includes sites within the Green Belt, which serve no or very limited Green Belt function.

3. Green Belt is a policy designation that can be removed, in exceptional circumstances, as part of the preparation of a local plan. While the Council accepts that there are exceptional circumstances for the removal of land from the Green Belt, and propose some limited Green Belt revisions, we consider that more land can and should be removed from the Green Belt, in order to achieve sustainable patterns of development in the District.
4. Additionally, the Council states that other authorities within the HMA are also heavily constrained and therefore would not be able to assist Tandridge in meeting its unmet needs. This means an even greater emphasis should have been placed on Tandridge meeting their own housing needs, and should have been taken into account when considering Green Belt boundary amendments.

5. The Council has clearly not sought to work with its neighbouring authorities to ensure housing needs are met in full, or indeed met its own OAN. Instead the Council has artificially constrained the supply of sites for development, and therefore not positively sought to meet the development needs of their area, as required by NPPF Paragraph 14.

6. Without a revised Green Belt review and the allocation of further sites, the Plan is considered to be unsound.
MATTER 3 THE SPATIAL STRATEGY

**Issue: Is the spatial strategy and settlement hierarchy as set out in Policies TLP01, TLP06, TLP07, TLP08 and TLP09 justified as the most appropriate strategy and is it based on robust evidence?**

3.1 Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

3.2 Is the proposed distribution of housing and other development supported by the Sustainability Appraisal, and will it lead to the most appropriate pattern of housing growth?

3.3 Is the distribution of new homes between the Tiers of settlements and proposed garden community justified and how has it been established?

1. In preparing the spatial strategy, no regard has been had to the requirement to fully meet the Objectively Assessed Housing Need (OAHN) whether this be 9,400 units, as set out in the Publication Plan, or the more recent reduced OAHN figure, suggested by the Council, of 7,960 units. It is clear that the capacity of the existing Tier 1 and 2 sites, along with a single new settlement, coming on-line towards the end of the plan period, would not meet this need in full even at the reduced OAHN level.

2. The Council has consistently failed to demonstrate a robust approach to ensure that the maximum quantum of sustainable development allocations have been achieved. By failing to remove unnecessary and unjustified constraints, and instead minimising the allocation of sites for development, the Council has failed to identify all sustainable locations for development and as a consequence has artificially constrained the options considered for distribution of development within the District.

3. A review of the Settlement Hierarchy, should have been undertaken early in the Local Plan process to ensure that the outputs were not predetermined, by the prior adoption of a Preferred Strategy, based on an unsound evidence base. In particular, we consider the decisions reached on which settlements fall in Tier 2 and Tier 3 to be unsound.

4. Furthermore, it is noted that the Settlement Hierarchy concludes that all designated Urban, Semi-Rural and Rural Settlements, not just the defined Tier 1 and 2 settlements, should be considered further in the Local Plan process as a matter of principle, as being suitable locations for sustainable housing provision. However, the Council has decided not to progress on this basis, instead rejecting Tier 3 settlements, through the Preferred Strategy. This is despite the evidence and thoroughness of analysis for defining different settlement tiers being "light touch".
5. The evidence base clearly indicates that some settlements that fall within Tier 3 are sustainable locations and so are appropriate locations in which to focus development, especially given the size of the OAHN requirement. As a result of restricting growth to Tier 1 and Tier 2 settlements, sustainable growth locations, such as South Nutfield, which would contribute to achieving sustainable patterns of development in the District, have instead been overlooked.

6. Given that the spatial strategy appears to have evolved out of the conclusions reached on the “light touch” settlement hierarchy work, we consider the spatial strategy to be unsound.
TANDRIDGE LOCAL PLAN EXAMINATION
REPRESENTATIONS ON BEHALF OF THE GUINNESS PARTNERSHIP AND BLACKTHORN HOMES

MATTER 4 GREEN BELT BOUNDARY ALTERATIONS

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<tr>
<th>Issue: Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?</th>
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<tr>
<td>4.1 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?</td>
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<td>4.2 In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?</td>
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<td>4.3 Have all realistic alternatives to releasing land from the Green Belt been considered, such as further development in the urban area or increasing development densities, and would the most efficient use of land proposed for release from the Green Belt be made?</td>
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<td>4.4 Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?</td>
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<td>4.5 In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level development proposed?</td>
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<td>4.6 In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?</td>
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1. As set out in our Matter 2 and 3 hearing statements, the Council has consistently failed to demonstrate a robust approach to ensure that the maximum quantum of sustainable development allocations have been achieved. In large part this has been contributed to by the failure to properly review Green Belt boundaries.

2. While the Council accepts that there are exceptional circumstances for the removal of land from the Green Belt, and propose some limited Green Belt revisions, we consider that more land can and should be removed from the Green Belt, in order to achieve sustainable patterns of development in the District. This can be achieved with limited loss of Green Belt land and avoid the negative social and economic impacts which would otherwise arise as a result of limiting development, and therefore the cost and type of housing provided in the District.

3. The requirement to promote sustainable patterns of development and the lack of opportunities to meet needs elsewhere either within the District or the wider HMA, combine to give the exceptional circumstances needed to make further amendments to the Green Belt and ensure development needs are met in full.
4. This point is demonstrated by sites including NUT010 and NUT014 which, despite the Council’s own Green Belt Assessment concluding that they should be considered further through the Green Belt Review/Local Plan process, were not taken forward.

5. Sites NUT010 and NUT014 do not perform anything other than a limited Green Belt function and therefore these sites should be removed from the Green Belt and allocated for housing development, as they provide an opportunity to deliver sustainable edge of settlement development at South Nutfield.

6. In view of the above, it is considered that the Green Belt Assessment does not provide a clear/robust methodology in terms of protection of the Green Belt as well as for identifying sites for potential Green Belt release. By not taking sites forward through the Green Belt Review/Local Plan process the Council has artificially constrained the quantum of development allocated in the Local Plan. The Local Plan is therefore considered unsound.