Dear Mr Philip

Tandridge District Council Local Plan Examination
Matter Statement representations on behalf of Mr Post
Promoting land north of Copthorne Road, Felbridge - FEL004

The attached matter statements have been prepared by myself at the request and on behalf of Mr David Post in response to the Tandridge District Council Local Plan 2033 Examination.

The matters addressed by these statements are:

- Matter 2 – The Provision of Housing
- Matter 3 – The Spatial Strategy
- Matter 4 – Green Belt

In accordance with the Inspectors Guidance Notes, Mr Post seeks not to repeat any issues raised previously within either his Regulation 18 consultation response or his Regulation 19 submission, as it is expected that the Examiner will have already considered these points in detail as part of the examination process.

Mr Post is promoting land to the north of Copthorne Road (opposite Doves Barn Nursery, Felbridge) for development. The site has been assessed as part of the Council’s Housing and Economic Land Availability Assessment (HEELA), under site reference FEL 004. In accordance with the Examiners Guidance Notes, Mr Post understands that omission sites will not be considered by the Examiner as part of the examination process, however there may be references to FEL004 in order to provide context to issues raised within the individual matter statements.

Matter statements are, as requested, below the 3000 words for each matter, and as a result Mr Post reserves his right to be heard at the Examination hearings.
A copy of this letter and accompanying matter statements has been sent both electronically and in hard copy to the PO.

Yours sincerely

Adriana Jones

cc. Mr David Post
    Mrs V Gibson
2.1 Issue A addresses the calculation of the Objectively Assessed Need for Housing (OAN), asking under para 2.2 of the inspectors MIQs if the use of the 2016 based household projections is justified in calculating the OAN for the District, and is it consistent with the Planning Practice Guidance.

2.2 As the Local Plan for Tandridge was submitted before 24th January 2019, it will be reviewed against the 2012 NPPF under the transitional arrangements detailed within the 2018 NPPF.

2.3 The 2012 Planning Practice Guidance states that ‘Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need’. There have been a number of potential OANs that have been used by Tandridge:

- 9,400 new homes over the plan period (470 per year) - Based on the 2014-Subnational Population Projections (Strategic Housing Market Assessment (SHMA) (2015)) - Regulation 18 Consultation
- 6,640 new homes over the plan period (332 per year) - Based on the 2016-household Projections.
- 6,056 new homes over the plan period (303 per year) - Stated in the Foreword of the Submission Version of the Local Plan as the number of homes Tandridge District can deliver over the plan period.
- 12,900 homes over the plan period (645 per year) - Based on the Governments Standard Methodology.
- 7,960 new homes over the plan period (398 per year) - Based on the 2016-Household Projections, with a 20% market signals uplift.

2.4 Policy TLP01 in the submission version of the local plan (MD1) sets out that the plan will provide 6,056 homes over the plan period (303 per year), as well as setting out where these new homes will come from. The proposed Main Modifications as submitted (MD16) proposes an update to all reference to the OAN to 398 dwellings per year (7,960 per the plan period) however no changes are proposed to policy TLP01. Clearly this is contradictory, and a failure by Tandridge DC to clearly identify where the additional 1,904 (95 homes per year) will come from.

2.5 Paragraph 159 of the 2012 NPPF states that Local Planning Authorities should

‘...prepare a Strategic Housings Market Assessment which identifies the scale and mix of housing....which meets household and population projections...’

and

‘...establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period’.
2.6 As it currently stands, Tandridge District Council is failing to meet any of the evidenced OANs, and as a consequence the plan is unsound when considering paragraph 159 of the NPPF, and the requirement of Local plans to be ‘positively prepared’. As you will be aware, there are a number parcels of land put forward via the Local Plan Call for Sites, such as FEL004, which are both available and deliverable, and would be considered suitable to fill the deficit in the Tandridge District Local Plan OAN.

2.7 With regard to the decision of Tandridge District Council to use the 2016-based household projections, this clearly goes against guidance published by Government² which states that

‘...the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing’

and that the Government

‘...is specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method.’

2.8. Para 2.7 of the Inspectors MIQs asks if all realistic options for meeting the OAN within Tandridge in full have been exhausted. The growth strategy agreed by Tandridge District Council, upon which the entire Local Plan is based, fails to consider how the defined sustainable villages in the tier 3 and 4 settlements in the District, such as Felbridge, could contribute to both meeting the OAN as well as supporting and enhancing the future sustainability of each of these settlements. There are positive development opportunities for sustainable development within the lower tiered areas, that have not been fully explored as a result of the identified preferred growth strategy.

2.9 The Government has made its position clear, in that it is committed to delivering 300,000 homes a year by the mid 2020s. Due to the proximity of Tandridge District and the attractiveness of commuting into London, house prices in Tandridge are amongst some of the highest in the country. A failure of Tandridge District to meet any of the OANs put forward will undoubtedly create a wider chasm between demand and supply, and can only result in an increase in already high house prices, less affordable homes for current residents, less diverse and mixed communities, and will undermine the Governments own housing target.

2.10 Tandridge District Council should consider an alternative spatial strategy - one that is inclusive, and considers how other parts of the District could play a part in meeting the OAN. As at present, many villages or rural settlements are simply ignored in the Local Plan, and by adopting a strategy which recognises that there are other suitable places within Tandridge that are sustainable in their own right (tier 3 and 4 areas), Tandridge District would in fact be supporting smaller sustainable communities that would benefit from development and improved service provision, thus supporting and improving their future sustainability.

Matter 3 - The Spatial Strategy

3.1 As briefly mentioned in para 2.10 of our Matter 2 statement, the spatial strategy chosen by Tandridge District does not consider how the sustainable settlements in Tiers 3 and 4 can contribute to meeting the OAN for Tandridge.

3.2 The Tandridge District Council - Local Plan 2033: Housing Topic Paper January 2019 (HNS2) confirms at paragraph 210 and 211 that

'all settlements can play a role in delivering sustainable development'

and that

'on this basis the Local Plan acknowledges that supporting rural communities (NPPF para 55) is an important consideration when seeking to deliver sustainable development as a whole.'

3.3 The Local Plan Submission Version fails to provide any policies which support rural communities. Tandridge District Council seems to rely on the Local Plan supporting the production of Neighbourhood Plans (already a national requirement) and the ability to infill (a green belt exception already in place at paragraph 89 of the 2012 NPPF) to fulfil the requirement of para 55 of the 2012 NPPF. In light of this, Tandridge District Council should be asked to clearly explain how the rural settlements, as set out in the Settlement Hierarchy, are supported by the Local Plan when considering sustainable development as a whole, and how they are playing a role in delivering sustainable development.

3.4 A significant proportion of the OAN is stated to be met via the proposed South Godstone Garden Community. A Garden Town Community takes on average between 6-10 years to plan. Whilst it has the support of Government, the South Godstone Garden Town is, at this stage, merely a concept, without form or structure, and as such one can assume the time to plan this Garden Town is towards the 10 year mark. As such, the certainty in terms of delivery of the Garden town is vague at best. Whilst in principle there is no objection to the garden town per se, to rely on such a vague allocation to provide a large amount of the OAN is at best risky, and at worst reckless. Concern has already been raised as to the availability of this site, and a failure of the site to progress in planning terms would result in a significant shortfall in housing for the Tandridge District. As is evident in the Local Plan Issues and Options Approaches (SCON5), other spatial strategies are possible - strategies that will meet the OAN - and Tandridge District Council should be tasked with reviewing their spatial strategy to reduce their exposure to risk by allocating further sites that may have been discounted during the latter stages of the Local Plan consultation process.
4.1 In order to address the need to meet the OAN, Tandridge District Council has recognised that exceptional circumstances exist to release Green Belt land to address the housing need. However, what is unclear within the Local Plan Submission Version or the supporting suite of evidence is why the Council has stopped short of releasing enough Green Belt to fulfil the OAN. An acceptance of exceptional circumstances to release land from the Green Belt to meet the OAN implies that the Green Belt contributing least to the five defined purposes as detailed within the 2012 NPPF should be realised. However, Tandridge District Council seems to have only taken this so far, and has failed to justify why some land has been released and not other land.

4.2 Felbridge is classed within the settlement hierarchy as being a sustainable location. Felbridge is less than 3 miles from East Grinstead, is served by good public transport and services, abuts development in the adjoining district of Mid Sussex, and due to its layout, density and extent of development does not exhibit an open character which contrasts with the surrounding fields and wooded areas. Site FEL004 sits directly adjacent to the village envelope, within the green belt, and would provide a logical, sustainable location for a small development by way of a small extension to the village. Part 3 of the Green Belt Assessment 2018 (GB1) looks at the possible insetting of Rural Settlements, including Felbridge, however goes on to conclude that Felbridge and its immediate surroundings were not considered appropriate for insetting as part of the Local Plan due to having ‘basic’ service provision. This process resulted in a failure to fully consider the contribution FEL004 specifically makes to the five green belt purposes, and the site was discounted as being ‘outside the preferred strategy’.

4.3 In order to ensure the Local Plan meets the test of soundness, and is positively prepared, the Council needs to reassess the sites it has discounted alongside the Green Belt Assessments, to identify additional sites to accommodate a greater proportion of its OAN and to ensure that housing needs in the district are appropriately addressed.

---

Mr D Post  
Tandridge District Council Local Plan Examination  
Matter Statements