TANDRIDGE LOCAL PLAN EXAMINATION
HEARING POSITION STATEMENT – 06 SEPTEMBER 2019
REPRESENTATIONS ON BEHALF OF BLACKTHORN HOMES LIMITED

Matter 2: The provision of housing

Issue: Is the Local Plan positively prepared, justified and effective in respect of housing?

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.

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.

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.

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.

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.

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?

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.

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.

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.
Matter 3: Green belt boundary alterations

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?

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.

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.

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.

This point is demonstrated by sites including SMA020 and SMA031 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.

Sites SMA020 and SMA031 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 Smallfield.

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.

If the Inspector would like to visit the sites or requires any further details, we would be happy to discuss further.

Kind regards

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