Tandridge District Council Our Local Plan: 2033 Examination The Provision of Housing

Representations on behalf of Godstone Parish Council

A: Calculation of the Objectively Assessed Need for Housing (OAN)

Issue: Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?

2.1 Is the preparation of the SHMA on the basis of a Housing Market Area (HMA) defined for Tandridge District justified? Is the definition of the HMA consistent with the Planning Practice Guidance?

No. Godstone PC supports and endorses the representations made by Oxted and Limpsfield Residents Group (OLRG) in relation to housing requirement and numbers and the evidence base to support those – including Settlement Hierarchy (SBC1 & 8) and Economic Needs Assessments (ECR1 & 4).

Godstone PC were a party to a collective representation with OLRG and 16 others in 2016 in relation to the Tandridge District Local Plan – Issues and Approach Regulation 18 Consultation. Those representations have not been addressed in the submission Plan. In association with OLRG, Godstone PC considers that the evidence shows that links with other local authorities are so minor that joint working, as part of a wider Housing Market Area, is not justified. Tandridge District did not work jointly with any other local authorities when preparing the SHMA nor does Tandridge District appear in the HMA evidence for any other local authorities.

On the other hand the definition of the HMA (HNS13 & 20) is not consistent with the NPPG because the methodology used in the OAN paper omits the step of defining the HMA and so does not fulfil the requirements of either the Framework or the NPPG as explained in Appendix 2 of the 2016 Collective Regulation 18 submission (included as Appendix 11-B in the OLRG Regulation 19 submission).

This is a fundamental flaw in the approach used in the OAN paper particularly in light of the dominance of inward migration in all of the scenarios shown. Tandridge is not part of...
the HMA for any other district and so any historic unmet need that has arisen due to under provision in those districts (higher inflows and suppressed outflows) and overprovision in Tandridge is not part of housing need that can be attributed to Tandridge. Tandridge is a predominantly rural district with no recognised economic centres and it is also reliant on other areas for services and infrastructure, and so there are no genuine drivers for either past or future high levels of inward migration.

2.2 Is the use of the 2016 based household projections justified in calculating the OAN for the District and is it consistent with the Planning Practice Guidance?

No. Godstone PC supports and endorses the OLRG position that:

Paragraph 158 of the 2012 NPPF states that Local Plans should be based on adequate, up-to-date and relevant evidence; the 2016 based household projections constitute the most recent evidence. The OLRG accept that using the 2016 projections is not consistent with the NPPG. However, whichever household projections are used, the OLRG refer the Inspector to the exceptional circumstances of Tandridge summarised in their answer to his question 2.6 and evidenced in Chapter 11 of their Regulation 19 submission. Increasing the OAN only fuels inward migration and exacerbates the affordability problem.

2.3 Is the 20% Market Signals adjustment justified?

No. Godstone PC supports and endorses the OLRG position that:

The vast majority of the SNPP standard population projection results is comprised of inward migration from outside of the Tandridge HMA. Adding 20% to those projections simply sucks in more inward migration and makes affordability worse. Even more inward migration would exacerbate the local wage disparity described in the 2015 SHMA: Analysis of Market Signals paragraphs 3.30 and 3.31 (HNS19).

The concept of attracting even more “unmet need from elsewhere” is also accepted in the most recent OAN paper (HNS5) where NMSS discusses the affordability uplift. The Council’s proposal for a 20% adjustment is therefore not supported by its own evidence. HNS5 post-dates the Regulation 19 consultation and so this is the first time the OLRG and others have been able to comment on it.

While OLRG recognise the government’s emphasis on affordability, they believe that this should not come at the expense of robust evidence showing that any OAN increase would
only add to net inward migration and exacerbate the affordability problem locally. Local people would be priced out of their home area by those moving into the area with higher paying jobs outside of the District.

### 2.4 Is the approach to defining affordable housing needs justified?

**No Godstone PC** supports and endorses the OLRG position that:

The SNPP population/household projections are used as the baseline for calculating the affordable housing need. This means that about 90% of the affordable housing “need” figure is comprised of inward migration, which contextually is the result of unmet need arising in other districts and from wider housing demand in the form of “lifestyle choice” and should not be included in the total.

The interpretation of the affordable needs assessment in both Policy TLP12 and TLP13 is not consistent with the NPPG. Paragraph 18.11 of the Local Plan wrongly asserts that eligibility for affordable housing is “determined with regard to local incomes and house prices” when that is the definition of the “affordability ratio” in the NPPG. The Housing Register criteria contain no reference to house prices, and instead include a specific list of eligibility criteria including the requirement to demonstrate a “local connection”. However, there is no mention of “local connection” anywhere in TLP12. The requirement for a local connection is also not reflected in how the 2018 and 2015 Affordable Housing Needs Technical papers (HNS11 and 18) have been used either in either TLP12 or TLP13. A local connection is likely to exclude most of those who have moved recently (i.e. inward migration).

### 2.5 Are the assumptions made in respect of employment growth realistic?

**No. Godstone PC** supports and endorses the OLRG position that:

Their Regulation 19 submission concludes that the 2015 AECOM Economic Needs Assessment (ECRT9) is the more reliable because it cross-checks each step in the process with “reality”, and so the results more closely align with the characteristics of Tandridge. The 2017 GL Hearn ENA (ECRT4) does not do this, and so, given the unique characteristics of Tandridge, circularity, double-counting and other assumptions and mathematical flaws that are exposed are embedded in the projection results.
This is also relevant because allocating employment land where there is no realistic prospect of it being used as employment land is contrary to the Framework (2012). Over-estimating local employment growth as is done in the GL Hearn ENA means that too much land is being allocated for “employment”. Any such misallocation would contribute to more Green Belt release than would otherwise be necessary. It may be more appropriate that this land is allocated for housing, for example regarding site SES04: Westerham Road Industrial Estate, Tatsfield.

In July 2013, the same consultant, GL Hearn, carried out a Locally-Generated Housing Needs Assessment which was received by the Council though not adopted. This is not in the Examination Library, but the document explains that nearly half of the projected employment growth is in sectors driven by population growth. As set out in their Regulation 19 submission, this means one must be very careful of circular issues. GL Hearn has carried out the most recent ENA (ECRT4) but that report does not mention the circular relationship and neither does the November 2018 DLP study (ECRT1). The 2013 GL Hearn Assessment sounded a note of caution about the use of the Experian figures. OLRG believe that is an important point given those same figures have been used without qualification in the 2017 GL Hearn ENA.

### 2.6 Are there other relevant factors to be taken into account in calculating the OAN?

**Yes. Godstone PC** supports and endorses the OLRG position that:

The vast majority – more than 90% - of the SNPP standard population projection results for TDC is comprised of inward migration from outside of the Tandridge HMA.

Chapter 11 of the OLRG Regulation 19 submission explains that Tandridge has a very unusual set of circumstances. It is the combination of these circumstances that makes the use of the SNPP “one size fits all” population and household projection models to be unreliable indicators of population change and household projections in Tandridge. The circumstances include:

- Tandridge has a very small population, is predominantly rural, but is located adjacent to districts with very much larger populations which have recognised economic centres and a critical mass of employment, services and infrastructure.
- Tandridge has very low levels of housing and economic self-containment – only 37.3% of moves are within Tandridge and only 28.4% of all employed residents live and work in Tandridge.

- Very low levels of natural change, despite the average age of the population being similar to other Surrey districts.

- Despite the very low levels of natural change, Tandridge has had exceptionally high rates of house-building compared to England as a whole, as well as to the SEP figure of 125 dpa. This has been combined with significant housing underprovision in other districts.

Inward migration was artificially stimulated due to the high rate of house-building because house-building and inward migration are linked (the Council confirms this as para 11.10 of Chapter 11 of the OLRG Regulation 19 submission explains). This rate of house-building has only been possible because of the release of a number of large brownfield sites, including redundant former public sector and other employment sites. There are no genuine reasons for net inward migration into Tandridge except these past high rates of housebuilding. Given that 94% of Tandridge is in the Green Belt, this inward migration would not have occurred if it were not for the (entirely fortuitous) release of these large sites. In some years, net migration into Tandridge has been more than 9x the quantity of natural change.

Migration data is based on GP registrations and other NHS data which does not explain the reasons why people move, so we must rely on contextual evidence. Historically, unmet need indicators in surrounding districts, particularly Croydon, are either higher or have increased while Tandridge indicators (mostly) have not. This indicates Tandridge has met unmet need arising in these other districts.

The high rate of housebuilding inadvertently met the unmet needs of other districts and boroughs in the past. This past is projected into the future in all of the SNPP projections. However, Tandridge is not required to meet unmet need that arises outside of the HMA, and so this unmet need should not be included in the OAN.

The Statement of Consultation response to the 2016 Collective Regulation 18 submission asserts that the reason for the inward migration is a “lifestyle choice to move to the countryside while keeping a job in London” (SCON5, page 1282/paragraph 32). This element of the projected population increase should not be included in the OAN because it is “demand” and not housing “need”.
Given that the SNPP standard projections are unreliable and unrealistic for Tandridge due to the unique combination of circumstances, the question arises what to do instead because the Framework requires an OAN figure.

The OLRG explanation of alternative calculation methods is supported.

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)?

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<th>2.7</th>
<th>Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework?</th>
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<td><strong>Yes. Godstone PC</strong> supports and endorses the OLRG position that:</td>
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<td>The Council is justified in not meeting the full OAN for the reasons given in the answer to question 2.6 and amplified in their Regulation 19 submission and because the District is 94% Green Belt. It is consistent with paragraph 14 of the Framework because the adverse impacts of meeting the full OAN would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, and specific policies in the Framework indicate development should be restricted, in particular land designated as Green Belt.</td>
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<th>2.8</th>
<th>Have all realistic options for meeting the OAN within Tandridge in full been exhausted?</th>
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<td><strong>Yes. Godstone PC</strong> supports and endorses the OLRG position that:</td>
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<td>As explained in Chapter 2 of their Regulation 19 submission, Tandridge District is essentially a piece of Green Belt land. It is the hole in the doughnut, surrounded by large, built up, and economically far more powerful neighbours. Its distinctive characteristics are open countryside, high quality landscapes, small rural settlements and long-standing local businesses. It has no large towns, little employment and little infrastructure.</td>
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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?

No comment

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

No comment

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 Plan provide a sound basis for meeting the identified housing need?

No comment

2.12 Is the housing trajectory realistic and deliverable and are there any threats to delivery?

No comment

2.13 Is the contribution towards housing supply of housing from windfall, town centre initiatives and the predicted supply of 20 vacant dwellings per annum being brought back into use realistic and justified?

No comment

2.14 Is it justified that HSG20; North Tandridge: One Public Estate (NTOPE), Caterham is included in the housing trajectory?

No comment
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?

| No comment |

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?

| Yes. Godstone PC would rather the SGGC does not proceed but if the AAP is not progressed or not adopted in good time to deliver 1,400 homes by 2033 then a review of the Local Plan is a necessity and provision should be made in the Local Plan for that review in relation to:
| • failure to adopt an AAP by a date which would leave sufficient time to deliver 1,400 new homes, and
| • any inordinate delay in preparing an AAP that has the same consequences. Without those provisos written into the Local Plan it is flawed for uncertainty as it cannot be taken that it will deliver its proposed housing provision. |

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? |
| No comment |

| 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? |
| No comment |

| 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? |
| No comment |
E: TLP:12 Affordable Housing Requirement

**Issue: Is the OAN for affordable housing justified and in line with national policy and guidance?**

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<th>2.20 Does the SHMA’s approach to calculating affordable housing need, comply with the stages set out in the Planning Practice Guidance?</th>
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| **No.** Godstone PC endorses the OLRG position that the SNPP population/household projections are used as the baseline for calculating the affordable housing need. This means that about 90% of the affordable housing “need” figure is comprised of inward migration arising from unmet need in other districts and from wider housing demand in the form of “lifestyle choice”.

To qualify for affordable housing a “local connection” is necessary (criteria explained in para 18.13 of Chapter 18 of the OLRG Regulation 19 submission). This excludes most of those who have moved recently (i.e. inward migration) and so the affordable need figures are hugely inflated. |

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<th>2.21 Policy TLP12 sets affordable housing requirements for developments within the Tiers 1 and 2 of the settlement hierarchy, in respect of sites released from the Green Belt and elsewhere. Would the policy be effective in ensuring the OAN for affordable housing is met? Considerations include:</th>
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<td>• Are the affordable housing requirements set at levels which maximise the delivery of affordable housing whilst not affecting the deliverability and viability of the Plan?</td>
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<td>• Is there a need to increase the housing requirement to help deliver more affordable housing?</td>
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<td>• What is the justification for the 15 dwellings or over threshold in Tier 1 settlements?</td>
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<td>• Is the policy justified in applying the affordable housing requirement to housing sites of five dwellings and over outside of Tier 1 and Tier 2 settlements and sites allocated as Green Belt Releases and is it consistent with national policy set out in the Written Ministerial Statement (WMS) of 28 November 2014 and the Planning Practice Guidance (031 Reference ID: 23b-031-20160519) on support for small-scale developers, custom and self-builders (or the Framework 2019)?</td>
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<td>• The Policy states that the tenure and size split will be determined by the Council’s most up to date Housing Strategy. Is the Policy, in requiring compliance with the Housing Strategy consistent with national policy given that the Housing Strategy is not part of the development plan?</td>
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No. Godstone PC agrees with the OLRG that the Local Plan misinterprets a number of the conclusions in the 2018 Viability Assessment (INF15) and so Policy TLP12 is not supported by it. This means that the potential to deliver affordable housing is understated.

OLRG in its Regulation 19, Chapter 18 representations (paragraphs 18.47-18.55), included examples of sites located in a Tier 1 settlement that are capable of delivering 40% affordable housing instead of the proposed 20%. Regarding sites to be released from the Green Belt, the PC endorses the OLRG position that a substantial number of these sites could support higher affordable housing requirements and still leave a considerable viability “cushion.”

The reliance in policy TLP12 on the “Housing Strategy” (HNS1), an unexamined Council-adopted document where there has been no opportunity for public scrutiny, examination or testing of its “soundness”, is inconsistent with the Framework. The Framework and the NPPG both explain that it is the role of policies in the Local Plan to define the amount, type, tenure and mix of housing needed. This should not be delegated to a Housing Strategy document that is completely outside of the planning system. Updating the Housing Strategy would mean that it will be impossible for developers to plan over the time horizon necessary to deliver even medium-sized scheme. Larger schemes require even longer time horizons.

2.22 Are the proposed Modifications to Policy TLP12 necessary for soundness?

No. The proposed modifications do not address the soundness issues.