Tandridge District Local Plan Examination

Matter 2 – The provision of housing

Examination Statement by Nexus Planning on behalf of Taylor Wimpey
1. This statement has been prepared by Nexus Planning on behalf of Taylor Wimpey ("TW").

2. TW controls some 122ha of land to the west of the A22 adjacent to Blindley Heath, which is available for a housing led development. TW has also actively promoted a Garden Community at Blindley Heath for 4,000 dwellings, the majority of which is available for development now.

3. TW is a member of the Tandridge Developer Forum ("TDF") and rely upon statements made by the TDF in respect of part A, B, D and E of this Matter.

C: The overall supply of housing

Issue: Is the proposed supply of housing for the Plan period realistic?

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

1. TW rely upon the TDF statements in this regard and in particular, we note that the TDF indicate the South Godstone Garden Community ("SGGC") could only accommodate 600 dwellings during the plan period compared to the 1,400 dwellings assumed by the Council in its Housing Topic Paper (HNS2). The following comments relate to TW’s specific land interests.

2. A key element of the uncertainty surrounding the timescales for the delivery of the South Godstone Garden Community ("SGGC") are associated with the compulsory purchase order ("CPO") process necessary for some 40ha of land within the broad location, where 348 individual owners exist who are located across the world. Having regard to the geographic location of this parcel and the Council’s commentary on the land in question, it would appear that the Council consider this land will be required, at least in part, to deliver the SGGC.

3. TW consider that by increasing the ‘area of search’ identified at page 245 of the TDLP (MD1) to include land surrounding Blindley Heath, this would create a true broad location (as anticipated by paragraph 47 of the NPPF) identifying significantly more land than is required to deliver the policy objectives but noting that many areas would not be appropriate for development, and importantly presenting an opportunity for the Council to consider a range of options for allocating growth as part of the Garden Community, including greater scope to minimise impacts across a range of considerations.

4. Paragraph 376 of the Housing Topic Paper (HNS2) states that “it is envisaged that the Garden Community development’s initial phase will be located around the existing railway station”, which is likely to include much of the land required to be CPO’d. However, the TDF has identified the potential and significant delays that are likely to arise in respect of the delivery of such land. Expanding the area of search would therefore create the opportunity to bring forward particular distinct development locations that are not subject to the CPO process in the early years of the Garden Community’s delivery, thus boosting supply during the Plan period relative to the TDF’s position. For example, TW’s land to the west of Blindley Heath, which is in the control of a national
The housebuilder is 122ha in size and could accommodate in the region of 1,000 dwellings, much of which could be delivered within the plan period.

5. The approach we advocate is not dissimilar to that adopted by Wokingham Borough Council in respect of its Strategic Development Locations, in particular to the south of the M4 motorway where a significantly larger area of search was identified than was required to deliver the policy requirements, covering a number of villages. The location of development was then determined through a further Development Plan Document and supporting Supplementary Planning Document, once sufficient evidence was available (although this could all be addressed within an Area Action Plan, as proposed by the Council).

6. Without the above advocated changes, we consider that the TLP is unsound as the SGGC in its current form will not deliver housing in accordance with the trajectory assumed. This results in a plan which fails to be positively prepared or effective.

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?

7. Assuming the TDLP is adopted in 2020 (the earliest possible timeframe), the Plan would need to be reviewed by 2025 in accordance with paragraph 32 of the NPPF (2019) (which would be relevant upon the point of a review), regardless of whether any additional review mechanism is put in place.

8. If adoption takes place in 2020, this would still only leave 13 years of the plan period left, noting that paragraph 22 of the NPPF 2019 now requires plans to be a minimum of 15 years post adoption. Therefore, by 2025 it remains to be seen whether 1,400 homes could be identified (assuming the SGGC was significantly delayed), allocated within an adopted part 2 local plan and delivered before the end of the plan period (2033). Furthermore, by this time the SGGC is assumed to be contributing towards the five year housing land supply.

9. As set out in separate Matter Statements, TW consider that risks associated with the housing delivery at the SGGC can be somewhat ameliorated through an expansion of the broad location to include greater development options and flexibility, and thus increase the likelihood of delivery within the timescales anticipated. However, if the Inspector was minded to introduce a review mechanism, TW consider that an earlier review mechanism than the standard five years is required to specifically address any potential delay in the adoption of the AAP. This should be no later than Q1 2023 i.e. the proposed adoption date set out in OTHS and/or where more than a 6 month delay in the AAP programme set out in OTHS arises, having regard to the limited scope for slippage. This is required to ensure that the plan is effective, positively prepared and therefore sound.