Land at Godstone Road/Longsdon Way, Caterham

Tandridge Local Plan – EiP Statement Matter 3
1. **MATTER 3: THE SPATIAL STRATEGY**

1.1 This statement has been prepared by Boyer on Behalf of Croudace Homes Limited, in response to the Inspector’s Initial Matters, Issues and Questions set for Matter 3 in relation to the Plan’s Spatial Strategy.

*Issue 3: 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?*

Q3.1 Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

1.2 No, the Local Plan does not fully respond to, or seek to meet, the identified objectively assessed housing need (‘OAN’). There are many reasons why the Plan’s failure to meet the identified OAN is unjustified and a detailed submission on the Spatial Distribution Strategy was made through our representations to the Regulation 19 consultation. However, it is clear that this overall failure is inconsistent with spatial objective SO4 ‘Housing’. This objective denotes the intention of the Plan to “provide a supply of homes, both affordable and market, which respond to the needs of our community” and underpins proposed Policies TL06, TL07, TL08 and TL09.

1.3 The Plan proposes a capacity-based delivery target of just 6,056 dwellings over the Plan-period. The inadequacy of this proposed requirement is drawn into focus through a review of the Housing and Economic Land Availability Assessment (‘HELAA’) (2017-2018), which identifies a significantly greater potential supply land for housing. The HELAA states that;

> “14 sites were considered to be deliverable, meaning that they could come forward in the next 5 years. Collectively these sites are estimated to be able to deliver 407 dwellings.

> 109 sites were considered to be developable, meaning that they could come forward in 5 or more years’ time, between 2024/25 and 2033 and beyond. Collectively, these sites are estimated to be able to deliver 22,053.”

1.4 Although not every site identified in the HELAA will be suitable for development, the amount of land being promoted for development points to additional capacity being available. Indeed, there are numerous sites at Tier 1 and Tier 2 settlements that merit proper consideration. This includes land at Godstone Road / Longsdon Way, Caterham (CAT016), which the Council’s Green Belt Assessment confirms does not contribute to the five purpose of the Green Belt (as specified under Paragraph 80 of the NPPF, 2012), and which is located within 400m metres of Caterham Railway Station and Caterham Valley Town Centre.

1.5 In addition, it is also a concern that most of the ‘Delivery Strategy Alternatives’ considered through the Local Plan Sustainability Appraisal (‘SA’) (and the draft Sustainability Appraisals prepared for the Regulation 18 and 19 consultations), are premised on the delivery of a new settlement, to be provided in conjunction with varied patterns of delivery at existing settlements. The potential to achieve significant growth via a combination of urban...
extensions and small / medium scale allocations (at Tier 1 and Tier 2 settlements) without a new settlement, has never been afforded genuine consideration.

1.6 Indeed, the Council’s long-standing preference for apportioning growth to a new settlement (because this directs growth away from existing settlements) has acted to discourage the Authority from properly evaluating (and thereafter allocating) genuinely ‘deliverable’ or ‘developable’ sites at existing settlements. In this respect, it is notable that suitable and sustainable sites at Caterham have been discounted from potential allocation, often on a tenuous basis. Similarly, only a single allocation (for 6 dwellings) is apportioned to Whyteleafe, despite this town being identified as a Tier 1 settlement.

1.7 The proposed new settlement at South Godstone has then come to be regarded (by the Council) as a ‘panacea’ that absolves the Authority from an obligation to allocate additional sites at existing settlements. Unfortunately, the South Godstone proposition is subject to well-documented ownership and infrastructure constraints. These constraints are so overwhelming, that it is doubtful that the required land can even be regarded as available for development, let alone developable. For details of such, we would refer the Inspector to the statement prepared by the Tandridge Forum in respect of Matter 6.

1.8 In summary, it is clear that all realistic options for the distribution of development within the District have not been identified and considered robustly in the formulation of the Plan for two principal reasons:

   a) the number and significant capacity of developable sites identified by the HELAA and the substantial number of available and developable sites being promoted for development.

   b) the lack of a proper evaluation of further options for development at the Tier 1 and Tier 2 settlements.

1.9 The failure to properly evaluate all realistic opportunities for development and allocate land to meet identified housing needs, means that the Plan cannot be regarded as positively prepared or justified, nor is it likely to be effective. The failure to release Green Belt sites that the Council’s own evidence base indicates make no contribution to Green Belt purposes also contradicts Paragraph 85 of the archived NPPF (2012), which indicates clearly that where Green Belt boundaries should “not include land which is unnecessary to keep permanently open”. The Plan therefore fails to comply with national policies.

In order that the Plan can be made sound, the LPA must undertake a genuine evaluation of sites promoted for development, and allocate additional deliverable and developable sites in accordance with the proposed settlement hierarchy. This includes releasing any sites, within the Green Belt, which are identified in the Green Belt Assessment (GBA) as making no contribution to Green Belt purposes.

Q3.2 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?
1.10 The Tandridge Forum, of which Croudace Homes is a member, has prepared a detailed commentary on the SA. This raises a number of cross-cutting concerns regarding the SA’s methodology and the robustness of the conclusions presented. We would refer the Inspector to the Forum’s submission on this issue.

1.11 However, a key point is that the distribution of development, as proposed through the Plan’s allocations, is inconsistent with the Settlement Hierarchy and proposed spatial strategy, which call for the growth to be directed towards Tier 1 and 2 settlements. The distribution of development (as actually proposed in the Plan) also contradicts the SA, which (at Table 23) clearly seeks to direct growth to upper-tier settlements. The inescapable conclusion is that the distribution of development envisaged would direct growth to less sustainable locations within the district. The Plan is therefore inconsistent with the objectives of the SA.

1.12 The SA’s testing of biodiversity considerations also raises concerns, as the adopted approach results in sustainable sites (at upper-tier settlements) not being allocated for development. Indeed, a review of the site assessments presented in the SA (at Section 5.11) suggests that many promoted sites were discounted from allocation on the basis of biodiversity concerns. However, upon further investigation of the Plan’s evidence base, the extent of ecological constraints is often found to be more limited; to the point that they would not preclude a site’s development.

1.13 For example, CAT 016 is not constrained by statutory ecological designations, nor is it subject to any localised designation. However, the site was afforded a ‘double negative’ SA score for biodiversity, allegedly as a consequence of ‘ecology assessments’. Yet, the Council’s ‘Site-Based Ecological Assessments; Rebuttals and Reponses to Promoter Representations’ (TEP, July 2018) (which forms part of the submitted evidence base) agrees that CAT 016 is sustainable, has development capacity and could facilitate ecological enhancements:

“TEP’s assessment recognised that the site is in a broad location which, near existing development, appears to be appropriate for residential development, and notwithstanding the overall assessment of the site as “ecologically unsuitable”, TEP’s advice to Tandridge DC was that a small development might be possible if loss of calcareous grassland that is capable of restoration were minimised, and if a package of balancing measures were put in place to restore calcareous grassland across the site.”

1.14 The promoter of the site has indicated a willingness to be flexible regarding the quantum of achievable development at CAT 016. At Appendix 1 is provided an indicative layout that illustrates how a reduced scheme of 40 dwellings could be achieved, leaving a larger area for biodiversity enhancements. The proposals could be revised further if appropriate. The underlying point is that an acceptable quantum of development could have been agreed through informal discussions between the Council and promoter, yet the Authority instead

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1 A further ecological assessment has been prepared in support of this reduced scheme and which explains how it accords with TEPs position. The Examination Programme Officer has been provided with a copy of the report and will make this available to the Inspector upon request.
opted to discount this site altogether. This an in an important point of principle in relation to the question posed.

1.15 It is concerning then, that the SA is used to obscure the conclusions of specialist assessments in the evidence base. In the case of CAT 016, the aforementioned TEP report indicates that the Council’s consultant ecologists advised the Authority that a limited development of the site would provide opportunities to achieve biodiversity enhancements. Yet, the SA does not recognise or act upon this conclusion and, as a result, discounts a site in an ‘Urban Settlement’, which is situated within meters of a railway station and a town centre, and which the GBA confirms makes no contribution to Green Belt purposes.

1.16 However, the broader issue (which is illustrated by the SA’s rejection of CAT 016) is that the SA’s awarding of ‘double negative’ scores for biodiversity, provides an almost ‘automatic’ basis for discounting a significant number of potential development sites, at Tier 1 and 2 settlements. Such sites, ‘automatically’ rejected in this way, have been denied the benefit of a balanced assessment, which affords proper consideration to the other metrics and objectives described in the SA, and which weighs potential constraints against wider benefits, such as meeting the identified housing need in sustainable locations.

1.17 The Plan is therefore inconsistent with the findings of the SA, with this resulting in a proposed pattern of distribution which fails to maximise opportunities to achieve sustainable development. This issue is worsened, because the SA presents arbitrary value judgements regarding sites and misrepresents aspects of the evidence base. This results in available, deliverable and viable sites in sustainable locations being discounted from allocation.

1.18 The issues described mean that the Plan is not positively prepared, nor justified in relation to the available evidence and fails to comply with national policies that require housing needs to be addressed in a sustainable matter. To resolve these issues, the SA needs to be revised such that it has due regard to the available evidence and facilitates modifications to the Plan, which should be directed to allocating additional and alternative sites, at sustainable locations in accordance with the settlement hierarchy.

**Q3.3 Is the distribution of new homes between the Tiers of settlements and proposed garden community justified and how has it been established?**

1.19 No, the distribution of new residential development between the different settlement tiers and the proposed new settlement at South Godstone, is inconsistent with the 2015 Settlement Hierarchy report and the 2018 update. The pattern of distribution is also inconsistent with Policy TLP01 ‘Spatial Strategy’, which indicates that (in the short to medium term) development is to be directed towards “the most sustainable settlements”, which are identified as Tier 1 and Tier 2 settlements.

1.20 The apportionment to Tier 1 and 2 settlements can and must be increased significantly to meet the Council’s OAN and address the likely shortfall in delivery from the identified sites. There are major concerns that the proposed South Godstone Garden Community is unlikely to be delivered at all, and there are particular doubts about its capability to contribute to the
supply of new homes during the Plan-period. In this respect, we refer the Inspector to the Tandridge Forum’s response to Matter 6.

1.21 The Plan should therefore consider realistic options for meeting the identified OAN, through urban extensions and small / medium-scale allocations at upper-tier settlements. Even if it is assumed that the South Godstone new settlement will eventually become a reality, then there is still a requirement for a significantly increased apportionment to sustainable locations at existing Tier 1 and Tier settlements. This is vital if the Plan is to meet identified housing needs and address affordability issues, in the short to medium-term.

1.22 A further concern is that the apportionment of growth to upper tier settlements appears to be inconsistent with the identified Settlement Hierarchy. For example, no new housing allocations are proposed at Oxted (other than as part of the regeneration of the town centre), despite the town’s identification as a Tier 1 settlement. Likewise, as noted previously, only 6 homes are allocated at Whyteleafe, which is also identified as a Tier 1 settlement.

1.23 Similarly, whilst 170 homes are proposed for allocation across Caterham Valley and Caterham on the Hill (both ‘Tier 1’ settlements), this apportionment is low when compared to the 305 homes proposed for allocation at Smallfield, a ‘Tier 2’ settlement. Warlingham, whilst categorised as an Urban Settlement, also received a lower overall score (in the 2018 Settlement Hierarchy Update) than does Caterham Valley and Caterham on the Hill. Yet, 400 dwellings are proposed for allocation at Warlingham, significantly more than at Caterham.

1.24 Whilst no objection is raised to the apportionment of land at Warlingham and Smallfield, in-principle, additional and more sustainable, opportunities for development at other Tier 1 and 2 settlements have not been adequately explored by the Council or have been discounted for inadequate reasons. Indeed, we remark that if Caterham Valley and Caterham on the Hill were recognised as a single settlement, then this town would likely receive a higher score than currently suggested in the Settlement Hierarchy report. This points to Caterham’s suitability to accommodate a significantly greater quantum of development than that envisaged in the Plan.

1.25 Accordingly, it is considered that the proposed distribution of residential allocations will result in growth at locations that are less sustainable. At the same time, the Plan fails to take advantage of opportunities to achieve development at the more sustainable upper-tier settlements. This approach, in combination with the proposal to direct longer-term development to an undevelopable location at South Godstone, results in a Plan that both fails to meet identified housing need and which is unlikely be effective.

1.26 It is therefore recommended that the Plan be modified in order that additional and alternative sites be allocated for development, particularly at Tier 1 settlements. The tenuous reliance on a new Garden Community at South Godstone should also be reconsidered.
APPENDIX 1 – INDICATIVE LAYOUT