Montagu Evans on Behalf of The British Home, Macmillan Cancer Support, The Royal Alfred Seafarers’ Society, Royal Society for Blind Children and the Royal National Lifeboat Institution (‘The Charities’) & Welbeck Strategic Land

Written Submission to Tandridge District Council Local Plan Examination

Matter 3: The Spatial Strategy

6 September 2019
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1.0 RESPONSE TO INSPECTOR’S INITIAL MATTERS, ISSUES AND QUESTIONS:
MATTER 2 PROVISION OF HOUSING - 24 JULY 2019

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?

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

1.1 Whilst we consider that all realistic options for the distribution of development within the District have been identified, we disagree that they have been considered robustly in the formulation of the plan.

1.2 As stated previously in the Written Statement for Matters 2 and 4, the Plan as currently drafted is fundamentally flawed as it makes no attempt to meet its full OAN. Tandridge’s proposed housing delivery figure for the Local Plan period is 6,056 dwellings against an OAN set out within the Publication Plan of 9,400 new dwellings and the OAN of 7,960 new dwellings set out in document HNS5. This approach runs contrary to the NPPF and cannot be considered sound.

1.3 Within document HNS 2, the Council have discounted the release of more Green Belt land in Tier 1 and Tier 2 settlements to deliver additional housing sites. We do not consider the justification for discounting this option to be robust as there are no other realistic alternatives proposed by TDC to meet their OAN within the Tandridge HMA. The most realistic and feasible option for the Council to meet their OAN within Tandridge is through the release of additional Green Belt land in a coordinated and controlled manner, focused on land around Tier 1 and Tier 2 settlements in line with the draft Plan spatial strategy. Such an approach is wholly consistent with the NPPF which envisages the release of Green Belt land in exceptional circumstances as is the case here. Indeed we would go so far as to say there is no more marked example of where Green belt release is required given the fact that Tandridge is 94% Green Belt coupled with the fact that there is an acute housing need.

3.2. 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?

1.4 We disagree that the proposed distribution of housing set out within the emerging Local Plan will deliver an appropriate pattern of housing growth. The emerging Local Plan proposes to deliver around 768 new homes at urban settlements (Tier 1 settlements). This equates to around 13% of the overall proposed housing figure of 6,056. As an example, Warlingham, a Tier 1 settlement with capacity to accommodate additional housing growth, is proposed to deliver approximately 400 new homes over the plan period. This equates to 7% of the overall housing supply. This is considered to be an unsuitable approach considering that Tier 1 settlements
identified within the Council’s settlement hierarch are the most appropriate locations for additional growth.

1.5 More proportionate growth should be sought across the settlement hierarchy, focusing on concentrating growth within Tier 1 settlements as they provide access to the highest concentration of services and employment within Tandridge and are considered to be the most sustainable.

1.6 In addition, the allocation of a Garden Village within South Godstone will result in an overconcentration of housing growth to the south of TDC in the medium to long term (approximately 23% of the overall proposed housing supply). This spatial approach to housing delivery is disproportionate and will further intensify undersupply issues in the north of the District. To ensure equitable and proportionate housing delivery within TDC across the plan period, additional land should be allocated for housing in the north of the district, focusing on Tier 1 settlements and seeking to meet the full OAN.

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

1.7 The proposed distribution of housing between the tiers of settlements is not considered to be justified as it would not result in an appropriate disposition of residential units across local authority area.

1.8 The draft Local Plan states that around 13% of the allocated sites would be delivered at Tier 1 settlements and 9% would be delivered at Tier 2 settlements across the District. In comparison, based on the emerging Local Plan housing trajectory, the proposed Garden Community would deliver 23% of the overall supply, concentrated within the south of the District. Notwithstanding the fact that the proposed housing delivery in the emerging Plan falls significantly short of meeting the OAN, this disproportionate approach to distribution of housing will further exacerbate undersupply issues within the wider District as it will concentrate growth to the south in the medium to long term.

1.9 As set out within the Written Statement for Matter 2, there is a clear need to allocate additional land for housing to meet the identified OAN. The draft Plan in its current form cannot be considered sound as it does not seek to meet the identified housing need and does not accord with the requirements of the NPPF. There is a clear need to allocate additional sites to meet the identified OAN. This should be focused in the north of the TDC, focusing on Tier 1 settlements to ensure parity of new housing distribution across the District.