Examination Statement

Tandridge Local Plan

Matter 3

For Wates Developments, Land Group and others
**Introduction**

We represent Wates Developments Limited (WD). WD, with others, has land interests adjoining the built-up area of Hurst Green. The company and the others, combined known as the Holland Park Consortium, have been active in making representations at every stage of the local plan process. WD and Land Group Limited are also part of the Tandridge Housing Forum (THF) which is making Examination Statements on various Matters. WD and Land Group are in full agreement with the THF Statements.

**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?**

**General** - Policy TLP01, on the face of it, is an understandable spatial strategy. However, it is flawed, in the main because it relies on delivery from South Godstone Garden Community (SGGC) for 1400 dwellings in the plan period. As the THF Statement confirms this is an unrealistic prospect. Because of this, the Spatial Strategy needs to be amended so that new housing is directed to the most sustainable areas and that means to the largest urban settlements, i.e. Tier 1 settlements.

The policy also needs to confirm that Tier 1 settlements offer greater sustainability credentials than Tier 2 sites. In the table indicating the source of supply a greater proportion of housing should be directed to the Tier 1 settlements. Of course, we say that the overall delivery target should be much greater than indicated in Policy TLP01, and so taking that into consideration together with little or no delivery at SGGC and a need to place new housing at the most sustainable locations, i.e. Tier 1 over Tier 2, and the Spatial Strategy needs to have Tier 1 settlements as the primary location for new housing if the needs for housing are to be met.

**MIQ 3.1** All “realistic options” have not been “considered robustly”. Because SGGC will either not deliver any homes or only very few homes, in the plan period, a Spatial Strategy which focuses new housing on the most sustainable locations, i.e. Tier 1 settlements is the most realistic option. Para. 16b) of the NPPF is clear that Plans need
to be prepared positively, in a way that is aspirational but deliverable (my emphasis). This policy is not deliverable.

**MIQ 3.2** The SA does not support the proposed distribution of housing for the reason that it makes no attempt to consider the impact of what would happen if SGGC does not deliver 1400 homes in the plan period. As the Statement by the THF shows, there is a strong likelihood that this will transpire. Whilst outside the timeframe of the Local Plan a Garden Community is considered to be part of an appropriate pattern of housing growth, for the plan period it will not deliver the homes which are necessary, and it is therefore a sustainable option. Secondly, the SA fails because it does not consider any options which do not include a Garden Village (see Table 15, volume 2 of the SA – Doc MD5).

**MIQ 3.3** For the reasons set out above the distribution of new homes is not justified in TLP01. Whilst we say the overall number of homes required should be higher (see THF Statement), homes at Tier 1 Settlements must form, by far, the greatest proportion of the distribution if housing needs are to be met and the plan is to be sustainable.

**CHANGES TO POLICY TLP01**

Our Local Plan will provide 11,000 dwellings within the Plan period to 2013 to 2033.

The majority of development will be directed to the most sustainable settlements which are the Tier 1 settlements (see Policy TLP06). Development will also be directed, albeit to a lesser extent in recognition of the lower order function they play, to Tier 2 settlements.

An Area Action Plan will be formulated for the South Godstone Garden Community, but it is not expected that the Garden Community will deliver significant levels of housing within the Plan period.

Approximately 50% of the housing (excluding Existing supply) will be directed to Tier 1 settlements.

**Spatial Strategy Policy wording**

**TLP06**

**MIQ 3.4** The reference in the policy to developments being "offset by appropriate infrastructure and service provision, in accordance with the policies of Our Local Plan
and most up to date Infrastructure Delivery Plan” is not consistent with the NPPF or PPG. Paragraph 20 of the NPPF requires Strategic Policies in Local Plans to *inter alia* “make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management and the provision of minerals and energy (including heat)” as well as “community facilities (such as health, education and cultural infrastructure).” All of this provision, together with housing, employment, retail, leisure and commercial, is part of the function of the development plan itself and not a consideration to be relegated to a non-development plan document such as the Infrastructure Delivery Plan.

On page 3 of the IDP it states that the IDP “does not influence, establish or impact upon the Local Plan Spatial Strategy or its objectives”. But through bullet 1 of Policy TLP06 it will do just that because if development proposals in line with the Spatial Strategy do not accord with the IDP they can be curtailed. As pointed out in the Inspector’s question the IDP is not part of the Local Plan (i.e. part of the Development Plan), and its content and future changes to it (for it is stated to be a “living document”), will not be subject to the scrutiny of a Development Plan Document.

**MIQ 3.5** The proposed Modifications, in relation to some individual housing site allocations, proposes to remove from proposed policy some infrastructure provision, for example in HSG18 the removal of “Relocation and expansion of Warlingham Village Primary School to provide an 3FE primary school”. The reason given is that this (and other requirements in other housing allocation policies) do not meet the test set out in the CIL Regs. But it remains that if infrastructure is required to be provided then the Local Plan and not the IDP should make such provision as per para. 20 of the NPPF. In answer to the question the proposed Modifications do not make the Plan sound.

**TLP06**

**MIQ 3.6 and 3.7** The answer to these questions is the same as for MIQ 3.4 and 3.5 above.