HEARING STATEMENT

Matter 3: The Spatial Strategy

MIQS questions addressed in this document;

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MIQS Question 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?

Response to Question 3.1

3.1.0 The answer to matter 3; question 3.1 is ‘no’, for the following reasons;

3.1.1 Tandridge District Council (TDC) conducted a lengthy exercise to establish their preferred Spatial Strategy, beginning with their initial Regulation 18 consultation; investigating potential patterns of development and providing a range of delivery options.

3.1.2 Given the geographical makeup of Tandridge, we acknowledge that limited options were available for consideration, largely focussing on the distribution of development between existing population centres and rural areas.

3.1.3 The primary concern is that the Spatial Strategy\(^1\) was not adequately informed by the wider evidence base. This led to a lack of subsequent correlation between the defined Spatial Strategy and the ultimate methodology for housing delivery. This raises significant concerns as to whether the Spatial Strategy was robustly considered, because the Local Plan could not ultimately implement the strategy, rendering it ineffectual.

3.1.4 TDC explored several spatial approaches for the delivery of the development needs of the Local Plan\(^2\). This formed part of the consultation under Regulation 18 and assessed the various spatial approaches available to TDC; providing detail regarding the likely volume of development that could be delivered by each approach.

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\(^1\) TDC - Preferred Strategy (March 2017)
\(^2\) Our Local Plan: Spatial Approaches Topic Paper (December 2015)
Approach 3 (which ultimately formed part of the preferred strategy) is set out in the Spatial Approaches Topic Paper\(^3\). This approach is described as delivering 8,569 dwellings and 87.4ha of employment land. The topic paper concludes that Approach 3 ‘provides near 90% of the identified need’\(^4\).

In October 2016, TDC published ‘Our Local Plan: Spatial Approaches Topic Paper; Sites Consultation’. This document formed part of the consultation under Regulation 18 and seeks to reach conclusions regarding individual sites. This document concluded whether individual sites were ‘appropriate for development’, whether ‘further evidence is required before a conclusion can be reached’ or whether a site ‘should not be taken further forward for consideration’. This is significant, because the sites being reviewed by this document included those that the Spatial Topic Paper had relied upon in forming projections for housing delivery.

The ‘Sites Consultation’ document does not present its findings in a manner that can be directly compared back to the ‘Spatial Approaches’ document. No revised figure is given for the likely number of homes to be delivered by the various spatial approaches in the light of the findings of the sites consultation, and no conclusions are reached regarding whether the findings of the sites consultation undermine the viability of any spatial approach.

TDC confirm\(^5\) that the plan will follow ‘Approaches 3 and 6’ (approach 6 represents the Garden Village initiative) of those spatial options considered by the ‘Spatial Approaches Topic Paper’.

The description of ‘Approach 3’ remains consistent with that set out in the ‘Spatial Approaches Topic Paper’, with development focussed on the urban fringe of Tier 1 and 2 settlements. Whilst some reference is made to the risks presented by the Green Belt\(^6\), there is no reference made to the results of the ‘Sites Consultation’ document and whether this undermines the viability of the spatial approach. No updated figures are provided for potential housing delivery, leaving us with the figures set out in the ‘Spatial Approaches Topic Paper’ as the most up to date.

When the initial delivery projection for ‘Approach 3’ of 8,569 homes is compared to the 4,656 set out in the final ‘Housing Supply Typology’\(^7\), the overall effectiveness of the Spatial Strategy must be questioned. The final housing delivery is only 54% of that projected when determining which spatial approach should be adopted.

Had the capacity of the spatial approach to deliver housing been more accurately quantified during the plan making process then this is likely to have prompted an analysis of possible alternatives.

\(^3\) Our Local Plan: Spatial Approaches Topic Paper (December 2015); pages 42-43
\(^4\) Our Local Plan: Spatial Approaches Topic Paper (December 2015); page 46, paragraph 6.18
\(^5\) Our Local Plan – Preferred Strategy (March 2017), paragraph 5.36
\(^6\) Our Local Plan – Preferred Strategy’ paragraph 5.16
\(^7\) Housing Topic Paper (HNS2) (January 2019) page 70, Table 9
By failing to update the delivery projections set out in ‘Our Local Plan: Spatial Approaches Topic Paper’ (December 2015) in response to additional evidence gathering by the plan process, TDC failed to present or acknowledge the significant shortcomings of this approach, leading to a systemic failure to consider whether alternative approaches should be considered and a misrepresentation of the viability of the preferred spatial strategy throughout the plan making process.

Proposed changes

Whilst there are no specific changes that can be made to evidence documents at this time, spatial approaches should have been reassessed as soon as it became apparent that the preferred strategy would prove ineffective in facilitating the housing needs of TDC, and alternatives should have been explored in the context of the wider evidence.

MIQS Question 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?

Response to Question 3.2

The answer to matter 3; question 3.2 is ‘no’, for the following reasons;

The process of assessing sustainability in relation to spatial approaches suffers from the same problems identified in relation to MIQS question 3.1, namely that the sustainability appraisal misrepresents the capacity of the spatial approaches to deliver a suitable supply of homes for the plan period.

In the ‘Sustainability Appraisal Volume 2: Options Assessments’ it is concluded that a general approach focussing on Tier 1 and Tier 2 settlements plus the Garden Village initiative is the ‘most sustainable’. This is consistent with the preferred Spatial Strategy.

In reaching this conclusion, the Sustainability Appraisal discusses the implications of the Green Belt, stating that (in relation to focussing development on Tier 1 and Tier 2 settlements) “the overwhelming majority of sites considered at such settlements are actually located on the fringes of the defined inset area, i.e. within the currently defined Green Belt”.

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8 Sustainability Appraisal (2018) Volume 2: Options Assessments; page 171
9 Our Local Plan – Preferred Strategy
10 Sustainability Appraisal (2018) Volume 2: Options Assessments; page 163
3.2.4 This Sustainability Statement was written 2 years after ‘Our Local Plan: Spatial Approaches Topic Paper; Sites Consultation’ and yet it does not recognise the potential risks to the delivery strategy presented by the findings of the Sites Consultation.

3.2.5 The ‘Tandridge District Council – Local Plan 2033: Sustainability Appraisal Volume 2: Options Assessments’ dated January 2019 (this document was produced following the conclusion of consultation under Regulation 19 but prior to submitting the Local Plan for examination), maintains the conclusions of the 2018 Sustainability Appraisal: development should be focussed on Tier 1 and Tier 2 settlements, plus the Garden Village initiative\textsuperscript{11}.

3.2.6 In reaching this conclusion, the 2019 appraisal discusses the implications of the Green Belt\textsuperscript{12}, stating that (in relation to focussing development on Tier 1 and Tier 2 settlements) “the overwhelming majority of sites considered at such settlements are actually located on the fringes of the defined inset area, i.e. within the currently defined Green Belt”.

3.2.7 A notable addition to the 2019 document is the inclusion of a ‘Note on Housing Numbers’\textsuperscript{13}. This note identifies that development relating to Tier 1 and Tier 2 settlements will only provide 3,635 homes. This is the first time that any evidence document has challenged the original projection of 8,569 homes set out in ‘Our Local Plan: Spatial Approaches Topic Paper’ (December 2015).

3.2.8 Throughout the process, the Sustainability Appraisal assesses the ‘concept’ of the spatial approach rather than the reality. Had the spatial approach been implemented by the Local Plan in the manner it was originally portrayed\textsuperscript{14}, then it could be concluded that this is supported by the Sustainability Appraisal. However, as the Sustainability Appraisal fails to consider the significant disparity between the spatial approach as proposed and the spatial approach as ultimately implemented by the Local Plan, it must be concluded that the Sustainability Appraisal does not support the final implementation of the Spatial Strategy (and thus the distribution of housing and the most appropriate pattern of housing growth).

\textsuperscript{11} Local Plan 2033: Sustainability Appraisal Volume 2: Options Assessments; page 173
\textsuperscript{12} Local Plan 2033: Sustainability Appraisal Volume 2: Options Assessments; page 165
\textsuperscript{13} Local Plan 2033: Sustainability Appraisal Volume 2: Options Assessments; page 165
\textsuperscript{14} Our Local Plan: Spatial Approaches Topic Paper’ (December 2015)
Proposed changes

3.2.9 Whilst there are no specific changes that can be made to evidence documents at this time, the sustainability appraisal should have reviewed whether the spatial approaches delivers accurate housing projections. Impacts relating to sustainability should have been reviewed in relation to the wider evidence base once it became apparent that the spatial approaches could not deliver the pattern of development originally proposed.

MIQS Question 3.3

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

Response to Question 3.3

3.3.0 The answer to matter 3; question 3.3 is ‘no’, for the following reasons;

3.3.1 The relationship between the proposed garden community and the distribution of new homes suffers from the same problems identified in relation to MIQS questions 3.1 and 3.2, namely that the sustainability appraisal misrepresents the capacity of the spatial approaches to deliver a suitable supply of homes for the plan period and therefore misrepresents the balance between the proposed garden community and new homes to be delivered around existing settlements.

3.3.2 The garden community was originally proposed as a single component of a wider delivery strategy\(^\text{15}\). This strategy identified a spatial approach whereby 8,569 homes could be delivered in and around Tier 1 and Tier 2 settlements, and that this could be supplemented by a new settlement. No figure is provided for potential housing delivery by the new settlement.

3.3.3 In the Preferred Strategy\(^\text{16}\), TDC confirm that the plan will follow ‘Approaches 3 and 6’ (approach 6 represents the Garden Village initiative) of those spatial options considered by the ‘Spatial Approaches Topic Paper’. No figure is provided for potential housing delivery by the garden village initiative.

3.3.4 In the ‘Local Plan: Garden Villages Consultation 2017’ issued as a component of consultation under Regulation 18, Tandridge identified that a garden village initiative could deliver between 3,000 and 8,000 homes\(^\text{17}\).

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\(^\text{15}\) Our Local Plan: Spatial Approaches Topic Paper (December 2015)

\(^\text{16}\) Our Local Plan – Preferred Strategy (March 2017)

\(^\text{17}\) Local Plan: Garden Villages Consultation 2017, paragraph 4.4
3.3.5 The ‘Regulation 19 Housing Topic Paper (2018)’ identifies\(^{18}\) that the garden village initiative will deliver 1,400 homes by the end of the plan period, with an additional 2,600 to be delivered beyond the plan period.

3.3.6 The projected housing delivery of the garden village initiative was not therefore understood accurately until the final draft of the Local Plan was prepared. It is therefore difficult to understand how the Sustainability Appraisal and Spatial Approaches can have considered the balance of development between the garden village initiative and development focused on Tier 1 and Tier 2 settlements, and these assessments provide no evidence that the balance of distribution was considered.

3.3.7 No specific justification is provided for the balance of delivery between the garden village and tiers of settlements. Between the ‘Spatial Approaches Topic Paper’ in December 2015 and the ‘Regulation 19 Housing Topic Paper’ in 2018, the overall quantum of development between settlement tiers and the garden village initiative was not documented or assessed.

3.3.8 The garden village initiative increased in significance as the plan process moved forward, and yet this increasing reliance on the garden village initiative was not considered by key evidence documents (such as the Sustainability Appraisal). In the preferred Spatial Strategy (2017), 90% of the OAN is to be delivered in and around Tier 1 and Tier 2 settlements with the garden village initiative as supplementary (and undefined). By the time we reach the final draft of the Local Plan, the preferred spatial strategy delivers only 50% of the OAN and the garden village initiative is responsible for 23% of all housing to be delivered across the plan period.

3.3.9 The implications for the distribution of new housing across the District of this significant shift in the balance of development was not considered by any evidence document associated with the Local Plan. Such a significant change in the overall pattern of development has implications for transport, infrastructure delivery, place-making, the overall trajectory for housing delivery, affordable housing provision etc. The distribution of new homes between the Tiers of settlements and proposed garden community therefore appears to be a coincidental consequence of the disjointed approach taken to the spatial strategy rather than any deliberate and justified plan.

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\(^{18}\) Regulation 19 Housing Topic Paper (2018), page 62