EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter 3 – The Spatial Strategy

05 September 2019

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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?
1. **Introduction**

1.1 This Examination Statement has been prepared by Neame Sutton, on behalf of Catesby Estates PLC (Catesby), and provides a response to the Inspector’s questions (29th July 2019) regarding the Spatial Strategy and Greenbelt Boundary Alterations in the Tandridge District Council Local Plan: 2033 (the Plan) and supporting evidence base. It is relevant to note that, as a member of the Tandridge Housing Forum, Catesby endorse the Matters Statements prepared by Judith Ashton Associates, on behalf of the Forum. This statement, therefore, supplements the points raised by the Forum.

2. **Matter 3 – The Spatial Strategy**

   (i) **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?

   (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?

   (3.3) Is the distribution of new homes between the tiers of settlements and proposed Garden Community justified, and how has it been established?

2.1 The current, adopted Core Strategy (2008) focuses almost 80% of housing development in existing Category 1 settlements outside of the Greenbelt. By contrast, the new Spatial Strategy, set out in the Local Plan 2033 (the Plan) promotes a wider geographical distribution of development (see Housing Topic Paper, 2018, p.38, para.221 [HNS6]), which as the Council states, is intended to deliver a more diverse scale of housing sites and a more varied housing offer (p.45, para.221 [HNS6]).

2.2 This being the case, Policy TLP01: Spatial Strategy of the Plan (p.39), directs development to Tier 1 and Tier 2 settlements in the first instance (768 dwellings and 533 dwellings respectively), with the longer-term plan to deliver the majority of new homes through the development of the South Godstone Garden Community (1,400 dwellings during the Plan Period, 2,600 thereafter).

2.3 Catesby is broadly supportive of the approach to the distribution of development, that is to direct development to the most sustainable Tier 1 and Tier 2 settlements. However, Catesby do consider that the Council has not taken advantage of the suitable land available in these settlements, particularly in relation to Godstone, as the general level of growth in the Plan has been limited and is heavily reliant on the South Godstone Garden Community site.
2.4 The Sustainability Appraisal (Volume 2: Options Assessments, 2019 [MD5]) highlights that a number of sites, for example Land East of High Street, Godstone (HELAA ref: 024), score more favourably than the proposed South Godstone Garden Community (pp.199, 212), which raises the concern that the Council has missed the opportunity, presented by these sites, to assist in meeting the full housing requirement and deliver much needed housing, within the first five years of the Plan Period.

2.5 The Summary of Policy Assessments set out in Volume 3 of the SA [MD6] (Table 204, p.328) confirms that the effect of the Tier 1 and Tier 2 settlement policies, is intended to create a more sustainable pattern of development, than that of South Godstone. This is correct, however, the development strategy in the Plan disregards the evidence.

2.6 Furthermore, the Council’s assessment of settlements, as set out in the Settlement Hierarchy Background Paper (December 2015 as updated in June 2018 [SBC1 and SBC8]), comes to a flawed conclusion, specifically with reference to Godstone. As set out in the Regulation 19 Representations, SBC1 highlights Godstone as ranking fourth, with an overall score of 30. This places the settlement on the same level as, for example, Warlington, which the Council ranks as a Tier 1 settlement (Urban Settlements). The document confirms the reason for this, is that Members identified a preferred strategy and the settlement hierarchy was amended to reflect this strategy.

2.7 It is evident that the same approach has been used in the SA (as set out above), where the conclusions on the suitability and sustainability of sites, have been overlooked in favour of the preferred strategy.

2.8 This suggests that the Spatial Strategy has been defined without the use of the evidence base.

2.9 The consequences of this approach are:

1. The Spatial Strategy, and settlement hierarchy in particular, is incorrect in the categorisation of settlements, particularly in relation to Godstone;
2. The Spatial Strategy does not result in the allocation of the most sustainable sites, Catesby’s promotion site (HELAA Ref: 024) being an example of one; and,
3. The Spatial Strategy does not result in the allocation of all realistic options for development, resulting in the Plan being constrained in terms of housing delivery and the accommodation of further development to assist in meeting the full Objectively Assessed Need (OAN).

2.10 The Council’s approach is, as a result, an inherently unsustainable Spatial Strategy, not supported by the evidence base, which fails to meet the residential development needs of the District.
2.11 If the Council accurately assessed the settlements, utilising the evidence in the settlement hierarchy background paper, the SA and Green Belt Study (please refer to the Matter 4 Statement), the outcome would be an increase in housing delivery, in the early years, in the settlements ranked as suitable and sustainable, with the capacity to deliver housing. This would assist the Council in rectifying the deficiencies in meeting the full OAN, as well as the trajectory, which fails to maintain a rolling, 5-year supply of deliverable housing sites.