Hearing Statement: 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?

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?

1.1 No. Ignoring travel to work patterns and the dominance of the car means that not all realistic options have been explored. When these factors are taken into account, it shows that a north and west perimeter distribution of development is likely to minimise travel to work distances and come closest to realistically achieving jobs near homes. This option has not been considered.

1.2 In the Settlement Hierarchy and its Addendum (SBC8 and SBC1), travel to work patterns, access to relatively cheap (Zone 6 rail travel) and frequently available public transport, access to essential services like GPs, hospitals, a health hub, and mental health services have not been taken into account. When they are taken into account, a different settlement hierarchy emerges.

1.3 The Settlement Hierarchy Methodology obscures the extent of existing access to essential services and explicitly ignores travel to work patterns, which is contrary to the NPPF, both of which lead to incorrect conclusions regarding the essential services available in each settlement and existing travel patterns. These are a fairly clear indicator of how people are likely to travel to work and access services if more housing is added in the same area. This is why travel to work patterns should be included in any assessment.

1.4 The dominance of the car in travel to work is important to understand because a common stereotype is that "everyone goes to work in London on the train", when the data shows that the majority of commuters drive to adjacent Boroughs and Districts where there are a much wider range of employment opportunities than in Tandridge. The dominance of the car means that geographic proximity and minimising travel distances become a relevant factor in assessing sustainability. Because this factor has not been incorporated into the Settlement Hierarchy, it is not a reliable basis on which to decide what locations may be sustainable or how to mitigate the impact arising from the dominance of the private car. This is necessary to comply with the sustainable development objectives of the NPPF.
1.5 The 2011 Census travel to work data showing that of those travelling out of the district to work, 65% travel to work by car and only 28% travel by train and 3% by bus. The data also shows that the top five destinations by car are: Reigate and Banstead, Crawley, Sutton, Mole Valley and Croydon. (Reference: 2011 Census via nomis, Table WU03UK: Location of usual residence and place of work by method of travel to work).

1.6 These much larger districts have realistic sizeable employment growth prospects due to expanding on an existing critical mass of businesses and services. Chapter 11, paras 11.104 -11.110 and para 25 of Appendix 11-B (2016 ColReg Appendix 2 Page 9) of our Regulation 19 submission detail some of the projects that these Districts are undertaking which will provide a diverse range of high quality employment growth. Also, the north of the Tandridge is covered by the Oyster Card (Zone 6), which means both lower cost and a greater choice of public transport options.

1.7 In Chapter 23 Employment, the Council recognises the importance of the employment centres to the north and west stating that the District is “....in excellent proximity to the employment areas of Gatwick Airport and Crawley...” and “In actively supporting our local economy and employment spaces, the Council must be pragmatic and recognise that our close connections with major employment locations such as Crawley, Gatwick, Croydon and Redhill, are likely to almost always influence the location of employment for our residents.” And yet this proximity to employment has been ignored when deciding the most appropriate strategy for housing development.

**Suggested modification**

1.8 Tandridge District is adjacent to the London Borough of Croydon to the north and Crawley Borough to the south west which is a central part of the Gatwick Diamond. These areas have major business expansion projects underway and large existing employment bases which they are growing. Horley, also to the south west, has a major business park planned adjacent to Gatwick. Its website states that the new business park will “create thousands of well-paid new jobs, many of them open to local people.” Therefore, a more appropriate pattern of development may be to locate housing as near as possible to these employment opportunities so minimising travel to work distances and promoting sustainable patterns of development. It would come the closest to realistically achieving jobs near homes because high quality employment growth in these other districts is far more likely to be achieved than in Tandridge District itself. We suggest this strategy should be considered as the most appropriate one for Tandridge.
1.9 The significance of these two factors -- car travel and reliance on employment elsewhere -- to sustainability is noted on Page 63 of the Settlement Hierarchy which confirms that both are contrary to the NPPF: “The NPPF is clear that unsustainable travel patterns should not be exacerbated and access to jobs near homes should be available to ensure sustainability.”

However, there is no recognition in the Local Plan that the distribution of development does not fulfil either the objective of locating jobs near homes or minimising unsustainable modes of travel.

1.10 To address the flaws in the Settlement Hierarchy, we included in paragraphs 11.87-11.92 of Chapter 11 of our Regulation 19 representation an alternative Settlement Hierarchy methodology which incorporates travel to work patterns and proximity to employment, services and infrastructure.

1.11 Our alternative methodology also incorporates consideration of access to good “metropolitan” level bus services with greater connectivity choices. Places which have these services are close to neighbouring areas such as Croydon, Reigate & Banstead, Crawley and Gatwick which means that the bus can be a viable alternative to the private car for many journeys, including travel to work. The remainder of the District has only a rural level of bus service.

1.12 Our alternative methodology also incorporates consideration of lower train fares available at those stations within Tandridge District that are in the Greater London Zone 6.

**Suggested modification**

1.13 Our alternative methodology produces a different settlement ranking that is more closely aligned with the paragraph 84 NPPF objective of promoting sustainable patterns of development. We would suggest that this alternative methodology is used to determine the Settlement Hierarchy and the resultant Spatial Strategy. The methodology is based on the approach taken for assessing the washed over Green Belt Settlements when the Detailed Policies were developed for Tandridge District. Both the approach and the Detailed Policies were found sound in 2014, and so should be a robust starting point.

**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?**
1.14 No. In our view, ignoring the factors set out in our answer to the previous question means that the SA assessments of options are flawed. This is more than a disagreement about “judgement” because it is the framework being used to make those judgements that is not correct as well as the conclusions.

1.15 The Sustainability Appraisal is not justified because it gives no clear and evidence based reasoning for the proposed distribution of housing or that the proposal will lead to the most appropriate pattern of housing growth.

1.16 The proposed distribution of housing and other development does not support S01 of the Sustainability Appraisal of Spatial Objectives (SSHA3, section 5.3 Table 9) because it does not provide opportunities for residents to work locally and the distribution of development largely ignores the jobs and rapidly expanding business centres close to the borders of Tandridge where homes could be built close to employment.

1.17 The distribution fails to acknowledge the reality of Tandridge District which is that it has no large towns and little employment and is reliant on other centres for employment and services; that there is constraint to jobs growth due to ever increasing competition from nearby larger population and economic centres that are expanding; that neighbouring districts have already been able, and are continuing to be able, to build on existing facilities or skills located in those districts in sharp contrast to the Tandridge economic proposition which seeks to build, attract and justify growth from almost no existing skills base, clusters, hubs or facilities.

1.18 S016 (SSHA3, section 5.3 Table 9) is another objective which is not supported. The distribution does not encourage the use of sustainable and integrated modes of transport infrastructure because it does not prioritise areas where there is lower cost travel and more bus services running more frequently and with greater connectivity.

1.19 The Sustainability Appraisal is incompatible with the Settlement Hierarchy and the Urban Capacity Study. It does not consider individual settlements in the same way that the Settlement Hierarchy does but instead combines settlements in a different and inconsistent manner. As the unit of assessment is inconsistent and not supported by either the Settlement Hierarchy or the Urban Capacity Study, the conclusions in the SA are also not robust.
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?

1.20 It is not clear how the distribution has been established but it is clear that it has not been decided according to the evidence and does not accord with the principles of sustainable development.

Spatial Strategy Policy wording

TLP06: Urban Settlements

Question 3.4 Is the Policy effective and consistent with national policy in requiring accordance with the Councils Infrastructure Delivery Plan which is not a development plan document?

1.21 No. The Infrastructure Delivery Plan (IDP) is not in the Development Plan, yet this policy states that applications are to be decided “in accordance” with it. The IDP is also expected to be updated more frequently than the Local Plan and outside of the NPPF Examination framework, and that has implications for both the soundness of TLP04 itself as well as decision making – i.e. how can the IDP be given weight unless it is part of the Development Plan.

1.22 The policy is not effective or consistent with national policy because the IDP has been prepared and updated outside of the planning and Examination system and so there is no mechanism for ensuring delivery of any of the infrastructure mentioned in it. The IDP should not be referenced in any policy in the Local Plan.

1.23 The Plan is described as “infrastructure-led” but this is not supported by the evidence both because the IDP is not a development plan document and therefore delivery of any infrastructure referenced in it cannot be guaranteed, and because the IDP itself contains no proper assessment of infrastructure needs, and the costs of any necessary infrastructure provision have not been factored into the site assessments.

1.24 Overwhelmingly, the items listed in the IDP read as policy objectives, statements of intent, or simply a wish list, rather than as identifiable projects which have a reasonable prospect of being delivered. There is no land allocated for infrastructure, and no policies for delivery of specific infrastructure requirements as required in the NPPF and PPG.
1.25 We first raised the problems with the lack of proper infrastructure assessment in 2016 in our first Regulation 18 representation, the Collective Representation on the Tandridge District Local Plan – Issues and Approaches Consultation. However, three years on, the IDP still has a lack of infrastructure policy specifics, an absence of land allocations, and a weakness in policy approach to viability.

1.26 In addition, the IDP demonstrates a lack of cohesion on infrastructure between different providers. This is illustrated by policy HSG13 where there is disagreement between Tandridge District Council and Surrey County Council over provision of an all-through primary school. This lack of cohesion has implications for Duty to Co-operate as explained in our response to question 1.1. While it may be the case that agreement is not required for the duty to be fulfilled, if the infrastructure provider does not agree under Duty to Co-operate, then is there any realistic prospect that the infrastructure will be delivered?

1.27 The Council cannot change the infrastructure requirements once they are put into the Local Plan. Being able to change them appears to be fundamental to the Council’s approach to infrastructure. Further clues that “flexibility” is aimed for with regard to defining infrastructure requirements are the inclusion of policies for new schools and burial grounds in the Green Belt. Schools are one of the easiest infrastructure items to plan for, and so the need for TLP23 is an indication that sufficient land for schools has not been allocated in the Local Plan and so a policy to build new schools in the Green Belt is felt to be necessary.

3.5 Are the proposed Modifications necessary for soundness?

1.28 No. The proposed Modifications do not address the problems with soundness.

1.29 While we would like to offer a solution, we cannot recommend that the IDP be included as a development plan document or that its contents are written into each site Policy because the work is inadequate and not properly evidence based. Infrastructure assessment needs to be properly carried out and then specific projects should be added to the relevant Local Plan policy.

1.30 Reference to the IDP should be deleted from the policy. In addition to the IDP there are a number of other documents referenced in the Local Plan that are outside of the planning
system and have not been examined or found sound. We suggest that all references to all these documents are removed from the Local Plan.

TLP07: Semi-Rural Service Settlements

3.6 Is the Policy effective and consistent with national policy in requiring accordance with the Councils Infrastructure Delivery Plan which is not a development plan document?

1.31 Our response to question 3.4 is similarly applicable to this question.

3.7 Are the proposed Modifications necessary for soundness?

1.32 Our response to question 3.5 is similarly applicable to this question.