Matter 5 Employment land provision

Issue: Is the plan positively prepared and would it be effective in providing enough employment land to meet objectively assessed needs?

5.1 Does the provision of employment land set out in Policy TLP01 take into account any future loss of B1 floor space as a result of permitted development rights and is the amount of land for B-use Class employment land justified?

5.1 The amount of land allocated for B-Use Class employment, particularly for B8 – warehouse and distribution -- is not justified because the employment land need projections contained in ECRT4 on which the allocations are based are not realistic and so they are contrary to the PPG.

5.2 The ECRT4: Tandridge Economic Needs Assessment Update 2017 projects such a vast increase in industrial land and office space (Chapter 4) that it is readily apparent that these figures do not:

   a. match the characteristics of Tandridge,
   b. match the structure of the local economy and the dominance of construction and absence of “growth” sectors, and
   c. take into the presence of large competing centres.

5.3 These are only some of the factors that will limit future employment growth, yet none have been taken into account in ECRT4. Instead the projections and method has been applied mechanically and so the employment growth scenarios are not realistic and so contrary to the PPG. We explain this in more detail in our answer to Q2.5.
5.4 Therefore, we conclude that the Plan allocates more employment land than is justified by any realistic assessment of local employment growth.

5.5 The employment land allocations are also contrary to paragraph 84 of the Framework as they include both the allocation and expansion of sites such as IES06: Paddock Barn Farm that are remote, not near settlements or homes, and where the only access is by private car or van.

5.6 Over-allocation of employment land is also contrary to paragraph 22 of the Framework, which explains that

…Planning policies should avoid the long-term protection of sites allocated for employment use where these is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.

5.7 Over-allocation will also put unnecessary pressure to release Green Belt for other uses, such as housing or infrastructure.

5.2 Will the provision of employment land proposed improve the self-containment of the districts in terms of the commuting patterns of residents?

5.8 No, for three reasons:

a. Most of the housing requirement is comprised of inward migration (HNS5: paragraph 3.8) where it is logical to assume that those inward migrants will tend to keep their jobs elsewhere simply because salaries are higher outside of Tandridge. (HNS19: paragraphs 3.30-3.33 SHMA Analysis of Market Signals 2015 and MD7: Appendix 1: Baseline information: Figure 06/7). The salary differential is structural
because it reflects the employment sectors located in these other districts and boroughs.¹

b. The employment growth scenarios on which the allocations are based are both flawed and unrealistic, and so we believe that there is no realistic prospect that local employment will grow at anywhere near the rate projected, let alone the “growth” scenario (also in ECRT4: Chapter 4) and so self-containment will not improve.
c. Competing centres nearby are continuing to expand based on their existing locational or skills advantage and it is simply not realistic to assume the “start from scratch” approach to attract “growth” or higher value added sectors will be successful in this context.

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<th>TLP20: Supporting a Prosperous Economy</th>
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<td>5.3 Is the Policy positively prepared and consistent with national policy in stating that proposals for development that would result in the loss of employment land will not normally be supported? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?</td>
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5.9 No, the policy is not positively prepared nor does it provide a clear indication of how a decision maker should react to a development proposal.

5.10 While we recognise the desire to prevent the loss of local employment, the policy and the supporting text appears to resist encouraging the best use of land. Some of this land will be brownfield in the Green Belt where ensuring the best use may avoid unnecessary and unjustified release of Green Belt.

¹ These inward migrants can also afford to pay more for houses in Tandridge than those that live and work locally which means that affordability is also unlikely to improve and may even worsen even at the current housing requirement because it is comprised mostly of net inward migration.
5.11 With regards to the policy itself, it reads like a “to do list” for the Council rather than a planning policy that can guide decision takers. Paragraphs 23.7-23.10 of our Regulation 19 provides more detail regarding policy construction.

Suggested alternative

5.12 Unfortunately, almost all of the economy-related policies are unsound, and most are not criteria-based and so contrary to paragraph 154.

5.13 We suggest bringing all of the economy-related policies into a single chapter, streamlining them and then rewrite to be criteria-based.

5.14 We also suggest if employment designations of existing sites are still necessary, then only Lambs and Hobbs because they are well-established sites.

5.15 However, for the reasons above we can see no purpose to second-tier allocations such as IES06: Paddock Barn Farm. These designations directs employment expansion to some of the least sustainable and most visually and environmentally sensitive locations in Tandridge and so any possible benefit arising from the proposed allocation/extension/intensification is outweighed by the proposed allocation being contrary to the Framework.

5.4 Is it justified and consistent with national policy that proposals need to show that the redevelopment of the site for residential purposes is identified through the Council’s most up to date brownfield register and is in line with the most up to date Infrastructure Delivery Plan given that these are not part of the development plan?
5.16 No, it is neither justified nor consistent with national policy for Local Plan policies to require accordance with documents outside of the development plan.

5.17 In addition, a proposed change of use to residential implies that the infrastructure needs of such a proposal may not yet be identified in the Infrastructure Delivery Plan, which calls into question the relevance of the IDP to the decision-taker in this instance. In these situations, an S106 may be a more appropriate mechanism to deliver the required infrastructure.

5.5 Are the proposed Modifications necessary for soundness?

5.18 No, because the modifications do not make the policy sound.

**TLP21: Employment Hierarchy**

5.6 Is it justified and consistent with national policy that proposals will be considered in accordance with the Council’s most up to date Economic Needs Assessment and Economic Proposition given that these are not part of the development plan?

5.19 No, it is neither justified nor consistent with national policy because proposals should not be required to be in accordance with documents outside of the development plan.