TANDRIDGE LOCAL PLAN EXAMINATION

Matter 8: Development Management Policies

Issue: Are the individual policies clear, justified, and consistent with national policy

TLP10 Responsive housing strategy

Q8.12 In terms of paragraph 154 of the Framework, does Policy TLP10 provide a clear indication of how a decision maker should react to a development proposal?

We note that the Council is proposing to amend its policy to respond to the concerns raised in representations that the Council were seeking to introduce policy via Housing Strategy. Whilst the proposed amendments do, to some extent, improve the clarity of the policy we remain concerned that the Housing Strategy will continue to set the direction for a variety of housing typologies and will be seen by decision makers as policy. The housing strategy would appear to remain the main driver of this policy rather than the evidence on what is needed for each of the housing types mentioned in the policy rather than the local plan itself.

We would suggest that the policy needs further amendments in order to be considered sound in relation to paragraph 154 of the NPPF. The policy should not refer to the Housing Strategy and instead state that proposals should be informed by the evidence on the need for different types and tenures of housing as set out in the most up to date Strategic Housing Market Assessment. This ensures that the policy is applied in relation to the evidence, which is a material consideration, and not with regard to a strategy document. We would also suggest that whilst the mix of size and type of housing required may need to have some flexibility and give consideration to the most up to date evidence there is a need for greater clarity in the local plan with regard to the accommodation needs for older people and self-build housing. This cannot be left
We therefore recommend that following amendments to TLP10:

In order to address the need for different types, sizes and tenures of new homes, including specialist types of housing, proposals should take account of the Council's most up-to-date Housing Strategy evidence on housing needs and supply as set out in the Strategic Housing Market Assessment and Authorities Monitoring Report.

Proposals should be informed by the Housing Strategy which will set the direction for a variety of housing typologies including:

- Self-build including the selection criteria
- Elderly persons
- Specialist housing
- Tenure, type, size and their mix
- Empty homes

Q8.13 The Council's Housing Strategy is not a development plan document. Is it justified that the Policy favours proposals which accord with it or that Neighbourhood Plans should assist in meeting its objectives? Are the matters listed those which paragraph 159 of the Framework states should be considered in the preparation of the Strategic Housing Market Assessment?

As set out above the Council have taken account of our concerns and provided further clarity as to the role of the Housing Strategy. However, we consider it necessary for further amendments, as outlined above, to be made in order for the policy to be found sound and ensure that the proposed Housing Strategy does not become policy in the absence of any detail within the local plan itself.

Q8.14 Are the proposed Modifications necessary for soundness?

Modifications are required to ensure the soundness of the policy, but we do not consider the modifications proposed by the Council would be sufficient to make the policy sound. As set out in our answer to question 8.12 the wording should be amended to reference the evidence supporting the plan rather than the housing strategy. In
addition, the Council should remove reference to elderly person’s housing and self-build housing and include a policy that will actively manage such development within Tandridge.

**TLP17: Health and Well Being**

8.22 Are the thresholds in TLP17 II for the requirement of Health Impact Assessments justified? Should Health Impact Assessments be sought for where a development would be likely to give rise to significant impacts on the health and wellbeing of the local population or particular groups within it (PPG Paragraph: 004 Reference ID: 53-004-20140306)?

No. The threshold for this policy is unjustified. Any residential development that meets the requirements set out in this plan should be considered to support the health and well-being objectives set out by the Council. These are matters that should be considered on a whole plan basis and not through site by site assessment which we consider overly onerous and have the potential to unnecessarily delay decision making.

8.23 Are the proposed Modifications necessary for soundness?

No comment.

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