Dear Sir / Madam

TANDRIDGE DISTRICT COUNCIL LOCAL PLAN - EXAMINATION IN PUBLIC 2019
WRITTEN HEARING STATEMENT ON BEHALF OF WOOLBRO HOMES

1.1 I write on behalf of Woolbro Homes, in respect of their interest in “Land at The Old Cottage, Station Road, Lingfield” (“the site”). This Written Hearing Statement follows previous representations made through earlier stages in the preparation of the emerging Local Plan for Tandridge District Council (TDC).

1.2 The site at “land at the Old Cottage” comprises a Site Allocation (HSG12) within the Submission Draft Local Plan (Reg.19) which is proposed for release from the Green Belt and to be ratified at Examination in Public (EIP). Appendices to this Statement comprise:

- Heritage Statement completed by Bidwells (Appendix A)
- Landscape & Green Belt Appraisal completed by LDA Design (Appendix B) including Parameters Plan

1.3 This Hearing Statement has been prepared ahead of the EIP of Tandridge District Council’s (TDC) Local Plan 2033, which is due to commence on 8th October 2019. This Hearing Statement responds to Matter 8 (Development Management Policies) only. Matters 2A, 2B, 2D, 3, 4 and 6 were addressed in a separate Written Hearing Statement submitted at an earlier date in accordance with the deadline for these matters.

2.0 Matter 8 – Development Management Policies

TLP18: Place-Making and Design

2.1 It is considered that this policy is effective and consistent with national policy for requiring good design as set out in the Framework (8.24). This is because this policy will ensure that new development is of a high design standard which is reflective and respective of the character, setting and local context, including those features that contribute to local distinctiveness. This policy will therefore ensure that development is of an appropriate density by ensuring that the character of the area is respected.

2.2 It is considered that the proposed Modifications are necessary for soundness (8.25) by clarifying important elements of the policy.

TLP19: Housing Densities and the Best use of Land

2.3 It is considered that this policy would not be effective and consistent with national policy in encouraging the effective use of land (8.26). This is particularly the case bearing in mind policies TLP18 and TLP43 which collectively ensure that new development must reflect and respect the character of the area, whilst also protecting the historic environment. With reference to HSG12 specifically, this cites an indicative
capacity of 60 residential units, despite having an area of 6.3ha. The Written Hearing Statement in relation to matters 2A, 2B, 2D, 3, 4 and 6 demonstrates that this allocation is much lower than it should be and that a material increase in housing density can be delivered on the Site without causing harm to heritage, landscape or Green Belt objectives. It is considered that policy TLP19 is not supportive of increasing densities in suitable and sustainable locations and is therefore inconsistent and in conflict with national policy and the presumption in favour of sustainable development contained in paragraph 14 of the NPPF.

2.4 It is considered that the Urban Capacity Study (UCS) (2017) referenced in the policy is a significant contributor to the policies lack of consistency with national policy in encouraging the effective use of land. Specifically, the UCS identifies areas adjoining site HSG12 as being Density Character Areas (DCA) 4 and 5 (DCA 4 – medium-low density; DCA 5 - low density). It is established in the UCS that the former DCAs should deliver a Baseline Net Density of 10-20 dwellings per hectares, whilst the latter should deliver 5-10 dwellings per ha. It is considered that densities such as these are overly prescriptive as other policies contained within the Plan (TLP18 and TLP43) will ensure that any future application will deliver a development of an appropriate density by requiring proposals to be reflective and respective of the character of the area, whilst also respecting the historic environment and heritage assets which are within, or in close proximity to the Site. In addition to this, it is also considered that the Baseline Net Densities conflict with national guidance in that density would not be maximised in suitable and sustainable locations such at HSG 12.

2.5 In addition to this, the UCS also establishes that sites located in Conservation Areas should be excluded from the Optimised Net Density. Again, it is considered that such an approach is not consistent or effective with national policy in encouraging the effective use of land in that the approach does not encourage sustainable development. For example, allocation HSG12 is clearly very sustainably located in terms of its access to public transport options (Southern and Thameslink Trains run from Lingsfield Train Station providing good quality access to locations both within and outside of the District) and services and amenities. By not applying optimised net densities on sites such as HSG12, this policy does not maximise housing delivery in suitable and sustainable locations. Again, it should be noted here that policies TLP18 and TLP43 will effectively protect the historic environment and ensure appropriate densities are delivered in Conservation Areas without the need for policy TLP19.

2.6 In summary, if sites are taken out of the Green Belt, density should be maximised (whilst ensuring that any application is appropriate and in keeping with local context) to ensure that housing delivery is also maximised. It is considered that this policy is not supportive of the effective use of land, nor does it support sustainable development. In assessing the site from the perspectives of heritage and Landscape, deliberation should be given to the Heritage Statement (Appendix A) and Landscape & Green Belt Appraisal (Appendix B) which accompany this Statement. Both of these documents support an increase in density on the site, with the Heritage Statement noting that whilst the nearby heritage assets hold significances ranging from low to high, the development of the site will have impacts ranging predominantly from neutral to low. Where it is considered that there is the potential for low impact upon an Asset’s significance, this impact can be partially mitigated through layout and masterplanning, the potential benefits of providing public access to the space (with reference to the erosion of open space within the Conservation Area specifically) and through the introduction of high quality, sensitively designed architecture. For context, if the Site was allocated to deliver 120 to 150 units, optimising residential density to this extent would provide approximately 48 to 60 affordable houses which would have substantial social benefits - this is not taking into account the social benefits accrued from the remaining market houses.

2.7 Further to the above, it is considered that policy TLP19 does not provide a clear indication of how a decision maker should react to a development proposal in terms of paragraph 154 of the NPPF (8.27) for the reasons as established.

2.8 The proposed Modifications are necessary for soundness (8.28), although for the reasons indicated
previously it is asserted that these Modifications alone are not sufficient to ensure soundness.

TLP43: Historic Environment

2.9 With reference to 8.82, it is considered that TLP43 is consistent with national policy as set out in the Framework in respect of consideration of effects upon the significance of heritage assets and the requirements to balance any harm against public benefits. Evidently, TLP43 places great importance on development proposals conserving and enhancing the character and appearance of heritage assets, both designated and non-designated. This policy will assist in ensuring that appropriate densities are delivered whilst also protecting the historic environment.

3.0 Summary

3.1 In conclusion, it is considered that policy TLP18 would be effective and consistent with national policy in terms of requiring good design as set out in the Framework. It is also considered that the proposed Modifications are necessary for soundness.

3.2 However, in the case of policy TLP19 it is considered that this would not be effective and consistent with national policy in encouraging the effective use of land. Rather, this policy is contrary to the purposes of sustainable development in that it is prohibitive of higher densities being delivered in suitable and sustainable locations.

3.3 With reference to policy TLP43, it is considered that this would be consistent with national policy as set out in the Framework in terms of consideration upon the significance of heritage assets and the requirements to balance any harm against public benefits.

3.4 We trust that the above is helpful in the context of the Examination in Public. It would be appreciated if you could confirm receipt of this Hearing Statement and Appendices. if you have any queries relating to the proposals, please feel free to contact Ben Dakin (ben.dakin@rokplanning.co.uk) or myself.

Yours faithfully,

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Director

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