Tandridge District Council: Examination of ‘Our Local Plan: 2033’

Tandridge District Council Hearing Statement

Matter 2: The provision of housing

September 2019
Notes:

1. The term 'The Council' or the abbreviation 'TDC' is used as shorthand for Tandridge District Council
2. The abbreviation LP is used for the submitted ‘Our Local Plan 2033’ (MD1)
3. All quotations are distinguished in italics and referenced in brackets
4. All references are to published LP evidence documents and the 2012 NPPF and associated 2014 PPG unless otherwise stated
A: Calculation of the Objectively Assessed Need for Housing (OAN)

Issue: Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?
2.1 Is the preparation of the SHMA on the basis of a Housing Market Area (HMA) defined for Tandridge District justified? Is the definition of the HMA consistent with the Planning Practice Guidance?

Response to Inspector’s Issues / Questions

2.1.1 Preparing a Tandridge District Strategic Housing Market Assessment (SHMA) is justified. It was a choice determined by the need to get on with housing delivery. In that respect is was the only approach available. The published evidence on the Housing Market Area (HMA) includes a full analysis of the Tandridge housing market in context of a wider sub-regional HMA. On this basis the definition of the HMA is fully consistent with the PPG.

2.1.2 It is difficult to define local area functional geographies (Functional Economic Market Areas - FEMAs or HMAs), especially within the orbit of London, where self-containment is, inevitably, limited (HNS13, 2015 Paper, Section 2, especially Paras. 2.6-2.12). The Council has not defined a Tandridge only HMA. Tandridge is part of a large, sub-regional, FEMA / HMA. Tandridge housing issues certainly cannot be considered in isolation from those of adjoining areas. It has always acknowledged that Tandridge is part of a wider HMA.

2.1.3 Plan evidence considers the wider area and Tandridge’s role in it (HNS13) and concludes: ‘evidence points towards Tandridge being a functional component of a HMA including Croydon, Reigate and Banstead and Mid Sussex. However, given timeframes it will be necessary for Tandridge District Council to carry out a stand-alone SHMA which draws on evidence from those authorities with the greatest functional relationships’- Para.6.14).

2.1.4 Due to the Development Plan position in other authorities’ areas (as summarised in HNS2 and HNS13 and updated in Appendix 1) and related Duty to Cooperate (DTC) arrangements and outcomes, the Council was left with no choice but to act pragmatically. All the HMA / neighbouring authorities decided to make other arrangements to prepare individual joint SHMAs not including Tandridge.

2.1.5 Tandridge had to undertake NPPF Para.47/159 ‘housing (and economic) needs assessments’ and prepare a Strategic Housing Market Assessment - SHMA for Tandridge District alone. This may not be ideal in the sense of HMA theory, but it is a
function of localism. The approach accords with the PPG: ‘Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should coordinate future housing reviews so they take place at the same time.’ (ID: 2a-007-20140306) and ‘Establishing the assessment area may identify smaller sub-markets with specific features, and it may be appropriate to investigate these specifically in order to create a detailed picture of local need’ (ID: 2a-008-20140306). Tandridge can justifiably be viewed as a smaller sub-market, particularly taking account of house price factors (See HNS13 Section 3).

2.1.6 It is important to recognise the likely consequences had the Council not proceeded in this way. Plan making in Tandridge would have been contingent on establishment of complex, formal, DtC governance (and potentially joint planning arrangements) across a widespread and ill-defined HMA. Most of the other LPAs were already proceeding with their own plans. Significant delay and uncertainty in respect of the NPPF’s intent to significantly boost housing supply would have arisen. TDC has avoided this by acting pragmatically. The NPPF ‘positive’ result is that the Council is on the verge of delivering a significant and sustained boost in housing supply.

2.1.7 Tandridge is a District of small settlements, where even the more built up service centres are dwarfed by neighbouring key settlements such as Croydon, Crawley, Redhill and Sevenoaks. The District has no major employment centre and has a complex commuting pattern. It has a rural character with extensive, environmental, landscape and transport infrastructure constraints. It also has a whole District Metropolitan Green Belt (MGB) policy designation (covering 94% of the District – all the area outside the main settlements). The constraints are fully recognised by all DtC partners. They provide the proper context for understanding the District as a HMA ‘sub-market’. They are also fundamental factors that determined Tandridge’s recent planning history of restraint, with relatively limited availability of new housing. This creates scarcity value, influences predominant housing types and sets the resultant affordability profile (HNS5 especially Para 5.5 on and HNS 1,12,13).

2.1.8 Needs assessment for the sub market area was undertaken within a DTC framework and involved extensive liaison and consultation with Local Planning Authorities (LPAs) from the wider HMA (PPG ID: 2a-007-20140306). No LPA has expressed concern about, or raised objection to, the Council’s approach. The issue of need and potential

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unmet need across the wider sub regional HMA (loosely defined as all adjoining authority areas) has been explicitly considered as part of DtC (see answer to Q1.1). The NPPF ‘positive’ thrust of the LP, in seeking to ‘significantly boost housing provision’ (NPPF Para 47) above the low level set by the restraint approach of the former Regional Spatial Strategy (HNS2 Para.12) has been readily acknowledged by all DTC Local Planning Authorities (LPAs) in their agreement of Statements of Common Ground (SCG).

2.1.9 DTC has demonstrated that no other wider HMA / nearby LPA authority has been able to directly accommodate unmet need arising from Tandridge. It is however important to note the levels of housing proposed in recently adopted or emerging plans for areas that are less constrained and lie beyond the MGB (for example Wealden and Mid Sussex). These make some allowance, through market signals uplifts, for higher levels of development than would be justified on the basis of a pure demographic assessment of need (See Appendix 1).

2.1.10 Future plan making and DTC (including statutory five-year plan reviews and potential joint plans under NPPF 2018/19 (Paras.17,26,27,33)) will have to assess the wider HMA position for the longer term, taking account of the latest official population and household growth projections. This will necessitate consideration of the implications of the Government’s Standard Methodology aspirational need figures (Ministry of Housing Local Government and Communities - MHCLG Technical consultation on updates to national planning policy and guidance October 2018 Para. 25. ‘Consistency with our aspirations’ - see also answer to Question 2.2 below). There is every advantage in getting Tandridge underway now in boosting supply, so it is best placed to contribute to this process.
2.2 Is the use of the 2016 based household projections justified in calculating the OAN for the District and is it consistent with the Planning Practice Guidance?

Response to Inspector’s Issues / Questions

2.2.1 Yes. The Council’s view is that using the 2016 based projections is evidentially justified. Their use is also consistent with, and specifically supported by, the NPPF 2012 and its associated PPG. There is a requirement to use the most up to date figures within a proportionate evidence base.

2.2.2 This question is answered in the context of the Council’s proposed Main Modification (TED01 page 22, Para.11.6) on Objectively Assessed Needs (OAN) and related evidence (HNS5).

2.2.3 ‘Full objectively assessed need’; (F)OAN for housing, must be assessed from the LP ‘evidence base’ (NPPF Paras. 47 / 159). Official population and household projections are the ‘starting point’ (PPG ID: 2a-015-20140306). Official population and household projections are generally updated every two years to take account of the latest demographic trends. The 2016 based projections accord best with the NPPF policy (Para. 158) of using ‘adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area’.

2.2.4 Though released late in the LP preparation process, the 2016 based projections should now be taken as the correct basis for OAN. This approach has been accepted in a recent Plan Examination under NPPF 2012, locally (Guildford). If the Council and Inspector did not use the latest projections, they would rightly be criticised for ignoring important evidence. The Council’s published evidence shows it has carefully considered all the relevant official projections as they have become available (HNS5 and 22).

2.2.5 The 2016-based household projections are the best available indication of likely future household growth in the District (HNS5). This is because:

- They are the most up to date set of official, Office of National Statistics (ONS), projections

- They use two years more recent data than the 2014-based projections

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• They benefit from improvements which the ONS made between the 2014 and 2016-based projections in the estimation of international migration

• The 2016-based population projections (on which the 2016-based household projections are based) reflect more accurately the ONS’s latest estimate of how the population of Tandridge has changed than the 2014-based set. The ONS estimate that the population of the District in mid-2018 was 87,496. The 2014-based projection for that year was 88,230 (i.e. 734 too high). This can be compared to the 2016-based projection of 87,608 (i.e. 112 too high). This suggests that even after four years the 2014-based population projections were over-estimating the growth of Tandridge.

2.2.6 Some have queried the reliability of the household formation rates in the 2016-based projections which are used to estimate how many households the projected population will form. In particular, it has been noted that the 2016-based projections only use data from the last two censuses rather than the last five used in the 2014-based projections. An Office of National Statistics (ONS) report entitled, “Household projections for England, comparisons with other sources: 2001 to 2018” is relevant here. This was published alongside the 2016-based household projections in September 2018. It reviews other sources of estimates of household numbers between 2001 and 2018, focussing on the household estimates derived from the Labour Force Survey (LFS). It shows that after 2011 there is a significant divergence between the household numbers suggested by the LFS and the household projections produced since 2011, all of which suggest higher household numbers. The lower numbers suggested by the 2016-based projections are the closest to the LFS estimates but are still somewhat higher. This raises the possibility that recent household projections may have taken as their starting point a set of household numbers in the base year that was too high – and potentially will be projecting future household formation rates that are too high. It also suggests that the 2016-based projections may be more realistic than the 2014-based set.

2.2.7 Government has now changed its policies (NPPF 2018/9 and associated PPG) to make the out of date 2014 projections the basis for an aspirational form of needs assessment using the ‘Standard Method’ (NPPF 2018/19 and MHCLG Technical Consultation – see response to Q 2.1 above). However, no changes have been made
to the transitional provisions in the NPPF 2019 which govern the use of the NPPF 2012 in this examination.

2.2.8 For this LP, it is not therefore relevant that the 2018/19 NPPF stipulates the use of the 2014-based projections in the Standard Method formula for calculating OAN. The Government’s decision to continue use of the 2014 projections in the Standard Method formula was policy based and pragmatic. The decision was only taken because the result was a higher national figure for housing need than the 2016-based projections. That higher figure was closer to the Government’s previously stated ‘aspiration’ as to what the national total should be. Government have made it clear that they are not casting doubt on the 2016 projections. They have, in effect, acknowledged that reverting to the 2014-based projections was a ‘quick fix’ and that they will produce a revised approach to use of official housing projections in housing needs assessment and the Standard Method before the 2018-based projections are released (MHCLG 2018).

2.2.9 The NPPF 2018/19 policy changes cannot be a justification for ignoring the important evidential insight into housing need afforded by the latest official projections. This point would apply regardless of the NPPF 2012 Transitional Arrangements. The new insight is particularly crucial to understanding and judging scale and acuteness of need in respect of any NPPF ‘exceptional circumstances’ justification for Green Belt releases (NPPF Paras.47/83 and the Calverton legal case explained at HNS2 Para.308 on; ‘the acuteness / intensity of the objectively assessed need’).

2.2.10 See also the Council’s answer to the Inspector’s Initial Questions Q2 (Examination Document TED02) and the comments on the OAN Standard Method in answers to other Inspector’s questions below.
2.3  Is the 20% Market Signals adjustment justified?

Response to Inspector’s Issues / Question

2.3.1 Possibly. A 20% adjustment is certainly the most that should be contemplated. However, inevitable questions arise as to the justification for, and value, of any market signals adjustment.

2.3.2 During the currency of NPPF 2012 the PPG offered only limited guidance about when and how market signals ‘adjustments’ should be contemplated. There was no specific method of calculation. The PPG suggests the relevant signals are land / house prices, affordability, rates of development and overcrowding (ID: 2a-019-20140306). This led to various ways of approaching the issue with adjustments (always uplifts) to OAN under PPG ID: 2a-020-20140306 - See relevant further comments in responses to other Inspector’s questions below). Inspectors have typically tended to consider and endorse adjustments based mainly on the workplace-based affordability ratio (HNS9).

2.3.3 For Tandridge the workplace affordability ratio does not give an accurate or fair impression of how affordable Tandridge is to those who choose to live in the District, as it takes no account of the significant proportion of the working population who commute to well-paid jobs in central London and other areas. The difference is self-evident from a comparison of the 2018 workplace-based ratio (15.62) with the residence-based ratio (11.53), which is based on the earnings of those who live in the District. However, the Council has accepted that Inspectors have, in effect, established a ‘going rate’ for affordability uplifts and, on that basis, proposed that a 20% uplift should be applied, even though a comparison based on workplace-based affordability ratio does not provide all the relevant evidence.

2.3.4 The workplace affordability approach is now included overtly in Government policy in NPPF 2018/19, through the Standard Method. As a result, the view taken is effectively that the proper response to poor affordability so defined is to provide more homes and that this will reduce prices (nationally and in each locality). This is explained in the Government Technical Consultation (MHCLG 2018): ‘the Government’s judgment is that these factors combine to indicate that there is no need to change its aspirations for increasing housing supply. This is consistent with the argument in the housing White Paper that the ambition of delivering more homes should be about both keeping

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pace with population growth and looking to address worsening affordability through tackling the previous undersupply of homes'. The new approach to assessing quantitative housing need based on a policy 'aspiration' brings to the fore the concept of demand rather than need. It also prioritises demand that is not effective (money backed). It adds an idea that building more houses will automatically reduce their price.

2.3.5 The Council has therefore suggested, and justified, as far as is possible, a 20% uplift to OAN. This is done in the sense only of the unofficial 'convention' of a 'going rate', arising specifically from workplace affordability ratios (HNS5 and 13) and the context of the Government's 2018/19 NPPF 'aspiration'.

2.3.6 However, the full evidence shows that 'poor' local affordability must be understood in a more sophisticated way. Fundamental, long standing, price differentials resulting from location and environmental attributes, the makeup of the housing stock (with values predominantly reflecting property size), and residence income levels, are all important influences. Affordability ratios are also currently particularly high, following a long period of buoyancy in the in the London and the South East housing market. This may now be changing as house prices begin to fall, particularly in the London area (ONS/ Land Registry Combined House Price Index July 2019). Cyclical price adjustment illustrates that affordability is affected by many factors other than the volume of new homes built.
2.4 Is the approach to defining affordable housing needs justified?

Response to Inspector's Issues / Question

2.4.1 Yes. The SHMA follows PPG guidance and good practice for this purpose (HNS17 Paras. 2.1-3 reproduced in HNS11). It defines a very substantial level of affordable need. This need falls within, and dominates, overall numerical need (latest conclusions in HNS23E Para 2.12.; 296dpa). It is not additional. The analysis of affordability for those in need locally (main evidence study HNS18 Fig.2.5 and related text) demonstrates that higher levels of housebuilding for market sale at prevailing and foreseeable prices will not directly address these affordable needs.

2.4.2 At the Inspector's request relevant parts of the analysis have been updated to take account of the 2016 based household projections (See the Council’s response to the Inspector’s initial letter / questions; Examination document TED02 – Question 2 and HNS23E).

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2.5 Are the assumptions made in respect of employment growth realistic?

Response to Inspector's Issues / Question

2.5.1 They are reasonable assumptions for quantifying LP provision of employment generating land, rather than, necessarily, realistic in all senses.

2.5.2 The only LP assumptions made in respect of employment growth are those used to estimate the quantitative and qualitative need for employment generating land (ECRT1 and 4). The assumptions are based on a reputable employment forecast (Experian 2017). The Experian forecast models the potential for growth in the main business / employment sectors represented in the District. The Council’s published evidence studies then use the sector growth forecasts to estimate potential need for employment generating land. This includes some estimates that make adjustments to increase the Experian employment growth estimates for sectors that may grow faster. This upward adjustment is to reflect the NPPF (Para.17 / 20 /21) priority for economic growth (NPPF and local economic development aspirations (ECTR 4 Paras.1.19-26 – summarises this process).

2.5.3 The Experian forecasts were deliberately selected as an evidential basis for the employment generating land allocations because they are relatively optimistic in their economic outlook. This is the correct approach for NPPF ‘positive’ planning. However, for that reason, and because the forecasts are independent of / not constrained by housing growth levels (LP capacity constrained levels of housing, or otherwise), the levels of employment growth predicted may not be entirely ‘realistic’. The forecasts of job growth almost certainly err on the high side. This is an important point to recognise in respect of the NPPF Para 158 and PPG (ID: 2a-018-20140306) requirement for integration of housing and employment strategies in the LP.

2.5.4 The PPG says that employment growth is a factor to consider when assessing housing need (ID: 2a-018-20140306). This applies primarily to need arising from an economic strategy with an imperative to increase labour supply and provide enough housing to enable that. There is no such imperative with the LP, because it is led by housing forecast and housing provision levels (within constraints / capacity), not employment growth aspirations. Additionally, the local labour supply exceeds local employment (a net out-commute). The Plan does not depend on, or set, a jobs growth target. The
Council’s position on this is set out in more detail in the answer to Q2.6 (in context of specific OAN matters and the integration of housing and employment strategies).

2.5.5 The proper evidential context for this issue is that the level of job growth that may occur in Tandridge could be much lower than the Experian 2017 forecast and the relationship between labour supply and commuting can only change marginally as a result of the LP. If, on reflection of the Council’s response to the MIQs overall, the Inspector considers employment assumptions and forecasting issues to be of potential significance for the soundness of the Plan, the Council would wish to present further response information and analysis covering:

- sensitivity analysis of available employment forecasting sources;

- jobs and homes ‘balance’ change; past, present and, potentially, under the LP;
2.6 Are there other relevant factors to be taken into account in calculating the OAN?

Response to Inspector’s Issues / Question

2.6.1 No. However, some parties suggest the PPG justifies uplifts to pure demographic OAN figures on grounds other than affordability. It is usually suggested that the highest form of uplift proposed gives the definitive OAN. Issues raised by such an approach are considered in more detail below:

a) ‘How should employment trends be taken into account?’ (PPG Reference ID: 2a-018-20140306).

a i) This Guidance is directed at assessing needs for housing and economic development in the context of an overall plan strategy. It is concerned with NPPF Para 158 policy that: ‘strategies for housing, employment and other uses are (to be) integrated’. The PPG does not suggest adjustment of demographic housing OAN figures on the basis of employment trends. Rather, taking account is very specifically about recognising the potential effect of housing provision on ‘commuting’, ‘infrastructure’ and the ‘location of new housing or infrastructure development’. The Guidance states that employment trends are relevant because: ‘where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns’. This is the usual position of a major employment centre. Tandridge is not such a centre. Labour supply in Tandridge exceeds labour demand, leading to a net out commute.

a ii) An analysis of the potential future balance of employment and labour supply changes in Tandridge is set out below. It addresses the apparent, surprising, suggestion made by some representors that extra homes would be needed to support future job growth in Tandridge (either growth stimulated directly by the Plan, or growth generally predicted in the Experian 2017 Forecast).

a iii) The NMSS report, “Updating the Objectively Assessed Housing Needs of Tandridge” of December 2018 (HNS5) considered the implications of the Experian 2017 jobs forecast (which has been used to assess the need for employment land) and concluded that no additional homes were needed to
support that forecast above those suggested by the demographic OAN with a 20% market signals uplift.

a iv) The Council has subsequently used three further commercially available forecasts to undertake a reality check (Inspector’s question) and sensitivity test on employment forecasting and implications for the Plan. It has also considered what the implications for employment growth might be of setting the Local Plan housing requirement at 6056 homes 2013-33. This has led to the conclusions that:

- Continuing to use the 2017 Experian forecast to estimate the need for employment generating land is a very positive planning assumption.

- The Plan housing requirement is more than sufficient to support Experian’s relatively high forecast of job growth in Tandridge.

a v) The following table summarises the 2017 Experian jobs forecast and three more recent forecasts considered by the Council:

<table>
<thead>
<tr>
<th>Workforce Jobs Growth</th>
<th>2013-33</th>
</tr>
</thead>
<tbody>
<tr>
<td>Experian 2017</td>
<td>7,700</td>
</tr>
<tr>
<td>Experian 2018</td>
<td>6,500</td>
</tr>
<tr>
<td>Cambridge Econometrics (CE)</td>
<td>-2,000</td>
</tr>
<tr>
<td>Oxford Economics (OE)</td>
<td>1,350</td>
</tr>
</tbody>
</table>

As can be seen, the Experian 2018 forecast is less optimistic than the 2017 forecast and the other two forecasts are considerably more pessimistic. Continuing to plan on the basis of the 2017 Experian forecast therefore represents a very positive approach.

a) vi) The NMSS demographic model (HNS5) has been used to estimate how the population of Tandridge would grow if homes are built in line with the Local Plan requirement of 6056 homes 2013-33 (dpa 303):
<table>
<thead>
<tr>
<th>Local Plan dwellings and population</th>
<th>2013</th>
<th>2033</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>35029</td>
<td>41085</td>
<td>6056</td>
</tr>
<tr>
<td>Population</td>
<td>84616</td>
<td>94415</td>
<td>9799</td>
</tr>
<tr>
<td>16-64 population</td>
<td>51895</td>
<td>52799</td>
<td>904</td>
</tr>
</tbody>
</table>

The December 2018 NMSS report (HNS5) calculated that 379 homes a year were needed to support the Experian 2017 jobs forecast. However, that calculation was on a worst-case scenario basis because it did not take account of the fact that the Experian model predicts changes to commuter flows. It does this in a way that land use planning for Tandridge should not encourage; with additional net out commuting arising and an increased dependency on transport infrastructure (in effect Tandridge takes on a greater ‘dormitory’ role to accommodate workers in the nearby main employment centres).

a vii) As noted generally in response to Q2.5, the PPG is concerned with commuting assumptions in the context of the ideal planning aim of providing housing close to where people are likely to work. It states:

‘Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.’ (ID: 2a-018-20140306)

a viii) The intention here is to ensure LPAs consider whether a Local Plan might create, or exacerbate, labour supply shortages, with adverse commuting consequences. This necessitates some analysis to explore whether, for the Plan area,:  

- there is a possibility of a shortage and;

- if any shortage will be met by increased net in commuting or reduced out commuting, rather than by the provision of additional homes to accommodate the workforce.
a ix) In line with this, when considering the housing implications of forecast job growth, it is useful to show the position under an assumption that the net commuting ratio remains constant throughout the plan period. The Experian and other nationally based forecasts do not do this. In Tandridge’s case they assume a considerable increase in net out-commuting. The key figures from the Experian 2017 forecast are as follows:

<table>
<thead>
<tr>
<th>Experian 2017 jobs forecast</th>
<th>2013</th>
<th>2033</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total population</td>
<td>84,600</td>
<td>100,500</td>
<td>15,900</td>
</tr>
<tr>
<td>16-64 population</td>
<td>51900</td>
<td>56200</td>
<td>4300</td>
</tr>
<tr>
<td>Resi-based employment</td>
<td>41500</td>
<td>51600</td>
<td>10100</td>
</tr>
<tr>
<td>16-64 employment rates</td>
<td>80%</td>
<td>92%</td>
<td></td>
</tr>
<tr>
<td>Workplace employment</td>
<td>33000</td>
<td>37000</td>
<td>4000</td>
</tr>
<tr>
<td>Net commuters</td>
<td>-8500</td>
<td>-14600</td>
<td>-6100</td>
</tr>
<tr>
<td>% net out commute</td>
<td>-20.5%</td>
<td>-28.3%</td>
<td></td>
</tr>
</tbody>
</table>

Note that Experian’s forecast implies that:

- The 16-64 employment rate (taken here to mean residence-based employment - all ages - divided by 16-64 population) increases from 80% to 92%

- Net out commuting increases from 8,500 people to 14,600 i.e. the net out-commute as percentage of the employed people who live in Tandridge increases from 20.5% to 28.3%

a x) The number of jobs that could be supported by the Plan housing requirement and population can be calculated as follows:
The above calculation shows that, with the Plan housing requirement of 6056 homes 2013-33 and a constant commuter ratio, Tandridge’s population (labour supply) could support an increase in workplace employment of 5551 people. This comfortably exceeds the workplace employment increase forecast by Experian; implying that the Plan housing requirement is sufficient to support the 2017 Experian jobs increase if PPG-compliant commuting assumptions are used.

a xi) This conclusion stands notwithstanding that the Plan increase in the 16-64 population is much smaller than that assumed by Experian: 904 as opposed to 4,300. The reason for this is that the Experian estimate of Tandridge’s 16-64 population in 2033 is driven to a large extent by their modelling prediction of increased out-commuting. (It might be noted that Experian’s estimate of the increase in out-commuting - 6,100 - exceeds their estimate of the increase in the 16-64 population - 4,300. This shows how large an effect their prediction on out-commuting has on their population estimate.)

a xii) Experian’s forecast for Tandridge is part of their national forecast, which covers all local authority areas. It assumes that places to which Tandridge residents commute cannot meet their jobs-led need for housing and deals with that by modelling increased commuting from locations that currently provide commuters. A modelling assumption is made as to how those commuter flows increase. That assumption does not take account of the ability of the assumed home locations of the additional commuters to house those people or issues such as whether a more likely outcome would be that the additional commuters would come from locations beyond the Green Belt which are much less constrained than Tandridge. Such issues are beyond the scope of the Experian model but crucial in a planning context. To use Experian’s forecast unadjusted

### Jobs supported by Plan housing requirement (Experian 2017 employment rates)

<table>
<thead>
<tr>
<th></th>
<th>Plan 16-64 population</th>
<th>2013</th>
<th>2033</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>16-64 employment rates</td>
<td>51895</td>
<td>52799</td>
<td>904</td>
</tr>
<tr>
<td>B</td>
<td>Resi-based employment</td>
<td>80%</td>
<td>92%</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>Experian 2013 net commute rate</td>
<td>A x B</td>
<td>41496</td>
<td>48477</td>
</tr>
<tr>
<td>D</td>
<td>Net out commute at 2013 rate</td>
<td>-20.5%</td>
<td>-20.5%</td>
<td></td>
</tr>
<tr>
<td>E</td>
<td>Workplace employment</td>
<td>C x (-D)</td>
<td>8499</td>
<td>9929</td>
</tr>
<tr>
<td>F</td>
<td>Experian workplace employment</td>
<td>C - E</td>
<td>32997</td>
<td>38548</td>
</tr>
<tr>
<td>G</td>
<td></td>
<td></td>
<td>33000</td>
<td>37000</td>
</tr>
</tbody>
</table>

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would be to allow their modelling assumption on the home location of additional workers, which is inconsistent with the PPG and was not designed to be used in this context, to drive Tandridge’s housing requirement. That is patently inappropriate.

a xii) Even if the assumptions made in the Experian forecast (either economic activity levels or population) were altered to reduce the labour supply figure and a (dubious) OAN uplift interpretation is placed on the PPG, any conceivable, theoretical, local labour shortage would be small / marginal. In reality, a shortage would not arise, because the labour market could readily adapt, through new commuting patterns (no less, and potentially more, sustainable than exist at present), and business productivity / labour wage changes acting to balance supply and demand. A “labour supply shortage requires more house building” form of uplift to the OAN figure is not justified in any circumstances.

a xiii) Some further important contextual points on employment are:

- As noted in the response to Q2.5 the Council has used employment forecasts as LP evidence only to estimate potential need for employment generating land (ECRT1 and 4). Experian forecasts were deliberately chosen for this because they tend to provide an optimistic outlook for employment growth; giving an NPPF ‘positive’ basis for planning employment land provision (a high level of land allocated than to support the Council’s Economic Proposition (ECRT7) and provide for market choice and contingency. The comparator OE /CE forecasts show that the Experian forecasts are for quite high levels of employment growth. OE predicts employment growth over the Plan period of just 1,600 people, (40% of Experian’s 4,000).

- The updated (2018) Experian forecast shows that, generally, forecasts of employment growth are falling. The current national trend of very high levels of employment growth has influenced recent forecasts to provide a very optimistic outlook. This growth may not be sustained as global economic conditions change.

- Despite the generally optimistic economic background influencing the forecasts, they all suggest that Tandridge (workplace) employment could

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Decline and that the net out commute may grow. This is an issue that the Council’s Economic Proposition (ECRT7) seeks, as far as possible, to ameliorate. However, this does not mean the plan is economic development led, or that additional housing growth is needed to cope with any consequent employment growth effects, which can only be small.

- The LP is housing forecast / provision led. It allocates employment generating land to meet maximum need as predicted in a forecast of sectoral employment growth in the area. However, it does not seek to achieve a job growth target, or set an overall strategy based on employment growth. The Experian employment forecasts are not presented as a general basis for the Plan.

- If a high net-out commute is seen as a concern (due to transport infrastructure pressures and environmental harm caused), one response might be to limit the amount of new housing provided locally, in favour of provision closer to the employment centres that Tandridge residents commute to. Another response might be to increase the capacity and use of the least environmentally harmful forms of transport (public). For an individual Local Plan these responses are largely theoretical, as they would have to be applied at regional level. Alternatively, the response might be to increase local employment and hope for some corresponding reduction in the net out commute. This is, to an extent, part of the LP 2033 strategy and Economic Proposition, albeit the limits to the influence of a Local Plan are fully acknowledged (See response to Q 2.5).

b) ‘How should market signals be taken into account?’ (Reference ID: 2a-019-20140306)

b i) The PPG’s guidance on market signals and potential adjustment to OAN is specifically directed to aspects of affordability or market failure of supply (See list of indicators and the guidance that: ‘The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be’ - TDC emphasis).
b ii) Tandridge has not typically experienced failure in supply or rates of development from planned development, as it is a buoyant, high value, high demand, housing market (HNS2 and the Councils Housing Delivery Test Action Plan - HDTAP). Affordability is therefore the only relevant issue for adjustments to demographic OAN. The Council’s evidence (HNS13) rightly looks at a suggested uplift entirely on that issue.

b iii) For the reasons summarised above and detailed in published evidence (HNS 2 and 5) it is questionable whether local land use planning decisions should be made on the basis that increasing land supply will reduce house prices. Nevertheless, the Council accepts that affordability is an important issue, and that Government policy (NPPF 2018/19) now appears to require an aspirational affordability adjustment to OAN (See response to Q2.3).

b iv) However, it should also be recognised that the Council’s overall LP response; in creating a new settlement / major housing location at SGGC is very NPPF positive on affordability. In Tandridge affordability is best addressed through action on the qualitative aspects of the new housing supply, (PPG ID: 2a-021-20140306), not by relying on numerical affordability uplifts. A different market sector would be provided for through SGGC (based on large scale development and small unit / low cost market / affordable / rented provision). This will shift the emphasis away from the housing market sectors that have been predominant in Tandridge in the past (small sites and larger and executive units, premium market sale / limited rented). This is likely to be more effective in improving affordability in the current economic and planning policy context. The shift in emphasis of the type of housing can be particularly achieved by development of SGGC in a way that facilitates direct public intervention (through public sector led land assembly and building by Registered Providers, new institutional rented housing providers and, potentially, the Council).

c) ‘An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes’ Reference ID: 2a-029-20140306
c i) This aspect of guidance is sometimes suggested as a further basis for OAN uplift. The affordable housing need estimates are certainly crucial in illustrating the ‘financial’ and qualitative basis of housing need. In the Tandridge case they provide a clear indication that the majority of need arising from demographic projections is not effective demand (money backed). This suggests a need for caution in the way ‘acuteness’ of need should be viewed when considering Green Belt exceptional circumstances (Claverton case explained in HNS2).

c ii) However, suggesting OAN uplift on this point is not what the PPG intends. Rather, this guidance is about a potential policy (plan requirement) response that ‘should be considered’. This would amount to providing more market sale houses, simply to support more affordable units (in proportion to, and subsidised by, market housing). This is a strategy option arising entirely from the prevailing method of affordable housing delivery which is highly constrained by viability realities. In that sense it is not a particularly useful approach in a long-term plan, as state subsidised housing funding availability and mechanisms are always subject to change. Funding changes provide a more certain boost to affordable housing supply. Also, as is evident in other aspirational aspects of Government policy, greater market provision is expected to suppress prices, with the knock on effect of reducing viability and thus the volume of affordable housing provision negotiated.

c iii) A decision to apply this strategy must be balanced against the adverse impacts that would arise (NPPF Para. 14). It is certainly hard to justify as part of an overall balance where ‘exceptional circumstances’ have to be shown to release the required Green Belt land and infrastructure constraints would need to be addressed.

c iv) The Council’s affordability analysis (HNS11) demonstrates that current market conditions are such that a very large part of the locally generated need and effective demand for housing is for subsidised, affordable, products. This reflects national economic factors and the regional housing market. This dominant affordability need is commonplace in SE England. It cannot therefore constitute an additional need based ‘exceptional circumstance’ within the LP strategy.

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c v) The qualitative approach to housing provision at SGGC, as explained above, is a more appropriate strategy response than extra housing numbers. It is better to make a plan that creates a different type of housing sub market, where there is a better prospect that a higher volume of lower priced market housing can be provided alongside affordable housing.

2.6.2 The Council’s view that the best way to judge the numerical need for housing is to focus on the pure demographic analysis, which estimates the numbers of homes needed as a result of population (including migration trends) and household change. This is the primary focus of NPPF 2012, with the intent that each LPA’s Plan would make a locally assessed contribution to boosting housing supply in response to growing population and potential changes in household formation.
Overall response to Issue A

i. The concept of local area OAN was conceived as fixing a numerical measure of housing ‘need’, based on recent demographic and migration trends. It was to be fundamental evidence for plan making. Government guidance subsequently suggested making upward adjustments to demographic based OAN figures in cases of poor market affordability. This is because demand is perceived to be high and unmet, thus raising prices (this is in turn leads to the assumption that increasing housing land supply will reduce land and house prices).

ii. The effect is to introduce a policy element to need assessment through an ‘aspiration’ (MHCLG Technical Consultation referenced above) to meet a perceived higher level of demand represented by high prices. This is confirmed in the finalisation of the NPPF 2018/19 Standard Method, which deliberately uses projections based on the highest past household formation trends and a mechanistic affordability multiplier. Unless treated carefully this approach can mix definitions of need and demand and move away from the suggested ‘objective’ element of OAN.

iii. All the Council’s comments on Issue A take the concept and definition of housing OAN as evidence based. OAN does not translate directly into a Plan housing requirement; which is a separate policy decision. This may seem obvious, but it is not clear that this distinction is properly acknowledged in some of the representations made on the LP. Their intent seems to be to apply all possible factors that might impinge on housing need in an extreme estimates way, so as to create an OAN figure that is as high as possible. It is also implied that that resultant figure should inevitably become the Plan housing requirement.

iv. Given the resultant potential for unproductive argument about precise OAN definition, the Council’s view is that the best way to consider OAN is as a range of estimates of housing need. There is no policy or guidance necessitating a fix on a single figure.

v. Given that the NPPF / PPG does not take OAN as determining the housing requirement, it is important to recognise that OAN is just one form of evidence relevant to that policy choice. Otherwise, it is accorded undue importance. Sometimes a particular version of OAN may provide the most appropriate evidence on which to directly set a Plan requirement. However, in a constrained Green Belt area the OAN range can only be used to judge the scale and acuteness of housing need (Calverton case). This is fundamental when considering the NPPF
exceptional circumstances justification for removing land from the Green Belt. From that perspective the most useful end of an OAN ‘range’ is the estimate of pure demographic need. Any higher market signals adjusted figures are related only to aspiration and potential demand, rather than need. Acuteness should, by definition, be associated with fundamental or essential housing need, not aspirational demand for more and better housing in a particular location. The aspirations end of the OAN range might, more appropriately, be used to directly set the plan housing requirement for a growth area. This is what has already happened in other parts of the wider HMA. (See Appendix 1, which shows plan progress of nearby LPAs and illustrates that outcomes on housing OAN and requirements differ between constrained authorities (e.g. RBBB) and less constrained growth authorities (e.g. WBC / MSDC)).

vi. The Council’s view is that Tandridge’s demographic OAN (332 dpa) demonstrates a significantly higher level of essential need for housing than was planned for under the Regional Spatial Strategy (where a deliberate restraint policy was applied- see HNS3). The Council accepts that the NPPF approach is now to significantly boost local supply in all local areas in response to essential need. This in itself provides part of the exceptional circumstances justification (growing development need) for some Green Belt release. The Council has taken the need evidence and positively set out to Plan to meet it as far as is possible, but with due regard to other important national policies and on consideration of the NPPF as a whole. The draft LP proposals come very close to meeting essential, demographic, OAN. Indeed, the relatively cautious assumptions made for land supply and dwelling yield mean that, in its implementation, the LP may meet demographic need in full.
Evidence

ECRT1 - Tandridge Strategic Economic Assessment 2018
ECRT4 - Tandridge Economic Needs Assessment Update 2017
ECRT7 - Tandridge Economic Proposition 2017-2022
HNS1 – Tandridge Housing Strategy 2019-2033 2019
HNS2 Tandridge Local Plan (TLP) 2033 Housing Topic Paper 2019
HNS3 – Tandridge Brownfield Register 2018
HNS5 Updating the Objectively Assessed Housing Needs of Tandridge 2018
HNS8 - Authority’s Monitoring Report 2018
HNS9 Review of Inspector’s Decisions on Strategic Housing Market Assessment and Objectively Assessed Housing Needs for Tandridge, Updated 2018

Strategic Housing Market Assessment (SHMA) series:

- HNS10 - Addressing the Needs of All Household Types for Tandridge Updated 2018
- HNS11 - Affordable Housing Needs Assessment for Tandridge Updated 2018
- HNS12 - Analysis of Market Signals for Tandridge Updated 2018
HNS13 Defining the Housing Market Area (HMA) for Tandridge Updated 2018
HNS17 – Addressing the Needs of All Household Types for Tandridge 2015
HNS18 – Affordable Housing Needs Assessment for Tandridge 2015
HNS22 - The Objectively Assessed Housing Needs of Tandridge 2015
HNS23E – Calculations to reflect 2016 based household projections
TED01 – Schedule of Proposed Main Modifications (May 2019)
TED02 – Response to Inspector Documents ID2 and 3
MHCLG Technical consultation on updates to national planning policy and guidance October 2018

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ONS Household projections for England, comparisons with other sources: 2001 to 2018
Assessing the accuracy of household projections through comparisons with household estimates and other data sources.

ONS/ Land Registry Combined House Price Index July 2019

Supporting papers

None

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Appendix 1 Neighbouring and Adjoining Local Planning Authority Plan Making Position April 2019
B: The housing requirement

Issue: Is the plan positively prepared and justified given that the Plan provides for 6,056 homes in the Plan period, against the OAN of 9,400 as set out in the Publication Plan and the OAN of 7,960 set out in the document Updating the Objectively Assessed Housing Needs of Tandridge (HNS5)?
2.7 Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework?

Response to Inspector's Issues / Questions

2.7.1 Yes. The LP approach to balancing development needs (OAN) and Green Belt release is entirely consistent with the NPPF (Para.14). The NPPF says ‘Local Plans should meet OAN...unless; any adverse impacts of doing so would significantly and demonstrably outweigh the benefits....; or specific policies.... indicate development should be restricted’. Plan requirements have to be set in relation to a judgement about ‘adverse impacts’ and ‘those policies relating to sites protected’......(including land designated as Green Belt and Area of Outstanding Natural Beauty - AONB – designations - NPPF Para.14 Footnote 9). Additionally, changes to Green Belt boundaries must only be made through a Local Plan where there is a clear demonstration of ‘exceptional circumstances’ (NPPF Para.83).

2.7.2 Tandridge is heavily constrained by the landscape quality and ecological value of its countryside and, in particular, by the Metropolitan Green Belt (MGB). The LP is based on a full assessment of these substantive physical constraints (SPS series especially SPS6) and a comprehensive Green Belt (policy) Assessment (GBA series). The Council has considered the assessment findings, consulted on them and made appropriate local judgements about how far it can go to meeting OAN.

2.7.3 The landscape and ecological constraints position and the GBA are therefore fundamental determinants of the Plan strategy. It would be inconsistent with Government policy to plan to meet OAN (however defined), regardless of ‘adverse impacts’ and harm caused to designated areas given recognition in the NPPF.

2.7.4 There is no general policy basis in the NPPF to indicate the correct balance between meeting OAN for development and Green Belt release. It is clear that the Government attaches great importance to Green Belts (Para 79) and national landscape designations such as Area of Outstanding Natural Beauty (Para 115). The Examination should test the GBA conclusions about adverse impacts and levels of harm caused, generally and in site-specific terms. However, it should not question the principle that the NPPF has left LPAs to make local, circumstance specific, planning judgements on
these issues and that this may mean it is not possible or appropriate for the Plan to meet OAN.

2.7.5 The planning system has always included the scope for local choice. The Government has reinforced the importance of that role since 2011. (Localism Act). It is a democratically elected Council, as LPA, that is best placed, and ultimately has the legitimacy, to promote the essential judgement about the balance between development and protected areas / sites.
2.8 Have all realistic options for meeting the OAN within Tandridge in full been exhausted?

Response to Inspector’s Issues / Questions

2.8.1 Yes. The plan is led, deliberately, by full survey and analysis of physical constraints (primarily impacts on landscape and ecology) and comprehensive GBA (examining options to change this fundamental policy constraint). See the Council’s response to Qs.2.7 and 2.9. The detailed consideration of constraints is covered in other questions and answers, especially to Q3.1.
2.9 What are the consequences of not meeting the OAN within the HMA for delivering a wide choice of high-quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities which meet the needs of different groups in the community?

Response to Inspector’s Issues / Questions

2.9.1 The consequences are that there will be less housing than the OAN analysis suggests might, theoretically, be needed. However, the level of provision is substantially boosted against levels of development previously planned for (HNS2). This will bring very significant benefits in respect of the delivery aims listed in the question.

2.9.2 There is are important caveats on this simple answer. What is the correct OAN? Can it be conceived of as an absolute figure? The Council’s view is that the question posed by the Inspector cannot be fully answered if taken in isolation from considerations of the various options for how OAN might be defined. If ‘realistic options’ are judged against the lower end of range OAN, which is determined by up to date demographic analysis (HNS5; 332 dpa) and the cautious land supply assumptions the Council has made are also re-considered, then it is arguable that the Plan already meets OAN. This is because there is sufficient potential variance within the land supply assumptions for the Plan requirement to be exceeded to that degree (332-303 + 29dpa). See the Council’s response to Matter 2C.

2.9.3 Specific impacts, against demographically assessed need (332 dpa) are that fewer people will be able to live in Tandridge (see estimates provided as part of the Council’s response to Matter 2A). The numbers involved are relatively small (say 30 dwellings per annum over 20 years, a total of 600 dwellings / households). At forecast average household size (2.4) this would be 1440 people.

2.9.4 The updated SHMA papers based on the 2018 OAN (HNS23E) give a general indication of the outcomes in terms of dwelling mix and affordability. Fewer homes provided (than the suggested OAN on which this assessment is based) would exacerbate these effects, but the impact can only be marginal (if the OAN gap is considered to be quite small).
2.9.5 The impacts in terms of the specific points raised; housing quality and choice, ownership and communities are much more difficult to judge. The Council’s view is that simply increasing the number of homes provided to meet any of the possible OAN figures by Green Belt releases on small or medium size sites spread through the District, will just reinforce current market sectors (high value / low affordability). These issues are better addressed by the Council’s proposal to open-up a new market sector through the SGGC development (see the Council’s response to Matter 2A Questions).
2.10 Would and/or where would any unmet housing need arising in the Tandridge HMA during the Plan period be met?

2.10.1 According to the Localism Act, NPPF / PPG, in the circumstances of Tandridge, unmet needs should be met within the wider HMA, but beyond the MGB. This depends on strategic planning via the Duty to Cooperate (DTC) (NPPF Para.157, PPG ID: 9-020-20140306).

2.10.2 The Council’s response to Matter 2A questions suggestions how the approach to date in areas adjoining Tandridge, but beyond the MGB, is already beginning to address unmet needs through substantial adjustments to plan requirements based on market signals and specific unmet need additions (see Appendix1).

2.10.3 In the longer term this is an issue that can only be addressed through joint strategic planning (under DTC arrangements). Tandridge is not in a position to influence these arrangements for outcomes in the short term, because adjoining authorities are all at more advanced stages of individual district plan making (PPG ID: 9-020-20140306). To hold up the LP because of that would be counter-productive in terms of boosting housing supply (NPPF Para.47).

Evidence

HNS2 - Tandridge Local Plan 2033 Housing Topic Paper 2019
HNS5 - Updating the Objectively Assessed Housing Needs of Tandridge 2018
HNS23E - Calculations to reflect 2016 based household projections
SPS series of documents
GBA series of documents
Supporting papers (SP)
None

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Appendix 1 Neighbouring and Adjoining Local Planning Authority Plan Making and Duty to Cooperate Position
C: The overall supply of housing

Issue: Is the proposed supply of housing for the Plan period realistic?
2.11 Does the housing trajectory set out in the Plan provide a sound basis for meeting the identified housing need?

Response to Inspector's Issues / Questions

2.11.1 Yes. The housing trajectory is robust and provides ‘a sound basis for meeting the Plan requirement.’

2.11.2 The trajectory is prepared to demonstrate that LP policies can deliver sufficient housing to meet the new LP Plan requirement, rather than identified ‘need’ (either OAN or Housing Delivery Test – HDT - derived).

2.11.3 The Council has now updated its housing monitoring to a 1 April 2019 base date and revised the detailed housing trajectory using this information. Full information is in a separate Supporting Paper (SP) (SP1 Five Year Housing Land Supply and Housing Monitoring Position April 2019 – Examination Document TED05). The information contained in the SP would normally be part of the Council’s full Authority Monitoring Report (AMR) published later in the year. However, SP1 provides an earlier source document for the latest housing completions, commitments, HDT and five-year land supply information to assist the LP Examination.

2.11.4 The 2018 HDT (65%) result for Tandridge is set out in the weblink below:

2.11.5 The HDT result requires an ‘Action Plan’ (HDTAP) and a 20% buffer in calculation of the five-year land supply. SP1 shows the Council’s 1 April 2019 five-year land supply position. Supply is measured against the NPPF 2018/19 (Para.73) ‘minimum housing need’ derived from the Standard Method, as required by the NPPF 2018/19 (Para 73) (SP1 Appendix 1). On this basis current housing land supply is approximately 2 years (SP1 Table 1a).

2.11.6 The HDT result clearly shows the need for the new LP to set a realistic plan requirement to replace the HDT determined housing requirement (which, in the absence of an up to date plan, is currently based on household projection derived figures and will eventually be set using the standard method need figure). Adopting a

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2.11.7 The SP also uses the new housing completions and commitments information to update the LP housing trajectory (SP1 Section 4).

2.11.8 The trajectory in the published LP is presented at high level, in an aggregated and simplified form. It is not appropriate to present the full detail of a trajectory within the Plan, as it is subject to constant change. The detailed assumptions behind the trajectory were set out and explained in published evidence (HNS2 especially Appendix 5). The update includes a roll forward of all relevant assumptions to take account of the now later estimated adoption date for the Local Plan and consequent delays in some LP housing allocations coming forward. For the purposes of the trajectory now, LP adoption is assumed to be at 1 April 2020, though this may not be achieved in practice. Some other assumptions have also been adjusted, but these changes are minor.

2.11.9 The trajectory shows that the Plan can be expected to deliver well over five year’s supply in relation to the Plan requirement of 6056 (303 dwellings per annum - dpa) for the first five years after adoption. It also shows the LP can also be expected to continue to generally deliver a five-year land supply throughout the plan period; albeit there may be some points where there are fluctuations in delivery levels year on year. This could result in land supply falling below a full five-year supply for short periods. An appropriate 5% buffer is applied (see the Council’s response to the Inspector’s initial questions – Q3 Examination Document TED02). All assumptions made are cautious, giving a highly robust estimation of what the Plan can achieve.

2.11.10 The intention of a plan trajectory is to show generally how housing will come forward as a result of the Plan’s policies being applied over the whole plan period. It is not intended to represent a precise indication of the Council’s land supply position at a particular point in time; as in as in a Development Management case consideration at

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LPA or appeal determination, or where a LPA has requested an NPPF 2018/19 Para.74 Annual Position Statement (APS) decision through a Local plan, or subsequent APS. The Council has not requested an APS decision (see the Council’s response to the Inspector’s initial Q3 TED02). Judgements on the adequacy of the LP trajectory should be made on the basis that evidence of land provision and future development prospects cannot be precise. Assumptions are always needed, particularly on urban capacity and windfall forms of housing development. The assumptions take full account of the type of plan being put forward and the physical and planning policy constraints it embodies. A plan analysis cannot predict all outcomes and the further forward it looks, the more uncertainty grows. A trajectory is prepared on the basis that Plan policies will have the desired effect.

2.11.11The revised trajectory detailed in SP1 shows that at adoption the Council would expect to be able to show 7 years supply (SP1 Table 1b). This reduces to 5.86 years if the Plan ‘shortfall’ is made up in the first five years of the Plan (Sedgefield Method - SP1 Section 3).

2.11.12This is a relatively ‘tight’ supply position, but this is to be expected, and is appropriate in a highly constrained area. If the five-year supply were greater questions would rightly be raised about:

- whether exceptional circumstances could be demonstrated in terms of a development need justification for the level of Green Belt release proposed

- the degree to which such releases might undermine the scope for urban regeneration.
2.12 Is the housing trajectory realistic and deliverable and are there any threats to delivery?

Response to Inspector’s Issues / Questions

2.12.1 There are bound to be some threats to delivery due to the inherent uncertainties in planning and the housing market over a period of 15-20 years. Some threats are general, as they arise from, global and national economic and financial conditions. A Local Plan cannot mitigate these. Local and site related threats are mitigated in the LP trajectory by making suitably cautious volume and timescale related delivery assumptions. That said, Tandridge is a buoyant, high value, housing market and local economic threats to delivery are very limited by comparison with many other locations. Tandridge’s housing delivery record shows that any land is allocated or permitted is highly likely to be developed. This is detailed in the Council’s HDTAP and in SP1 (TED05). Housing development in Tandridge has consistently exceeded adopted Plan requirements and this demonstrates a cautious approach to windfall within existing policy constraints. Some representations on the LP suggest that the Council’s trajectory is not realistic, or robust to future uncertainties. The reasons given, and the Council's responses are set out below:

2.12.2 Lapses on permissions granted. The trajectory is said to assume a high level of completions in relation to permissions granted. It is suggested that a lapse rate assumption (of up to 10%) should be applied because some permissions will not be implemented. There is no requirement in national policy for such a lapse rate. In Tandridge it would not be justified by local circumstances, nor historic trends. The assumed take up of permissions granted in the LP trajectory is indeed high. The Council’s view is that it has carefully considered all permissions granted and reviewed and excluded any that will not be, or are unlikely be, implemented. The exclusions are of permissions that amount to 89 dwellings. This is 8% of total commitments (1097) at 1 April 2019 (detailed in published evidence; HNS2 Paras.229-239 and in the source data for SP1 – TED05). This is effectively already equivalent to the lapse rate suggested. The local housing market is strong and planning permissions granted are nearly always implemented and this happens quickly. Further information and evidence on the history of delivery of permissions granted is included in the Council’s HDTAP (Weblink above).
2.12.3 **Windfalls:** The assumption for small site windfall development in the existing urban area (i.e. redevelopment and infill urban capacity / non-greenfield development options) is said to be too high. The Council’s view, explained in detail in published evidence (HNS2 Paras.233-237), is that the windfall assumption is very modest. It is based on approximately half of the average delivery from small sites over recent years. It excludes all development on garden land. The garden land exclusion is based on Government policy and guidance intended to discourage loss of garden land and changes in the character of existing urban areas (NPPF Para.49). The evidence is that this is, in fact, a continuing and significant source of windfall development in the District (a past average of 22 dpa; 40% of the per annum small sites windfall total). Government policy also appears to be shifting to reduce the emphasis on protection of garden land (NPPF 2018/19 Para 70). Windfall expectations are also cautious in that there is no allowance for larger, currently unknown, sites coming forward. This is addressed partly in town centre redevelopment and urban regeneration assumptions (see below).

2.12.4 **Town centre redevelopment and urban regeneration:** It is suggested that the Council has made some unrealistic assumptions about particular sources of supply from within the existing urban areas of the District (i.e. those not requiring Greenfield / Green Belt release). This applies especially to the town centre and regeneration sites allowances made, including for the One Public Estate (NTOPE) initiative. On reflection, and considering comments made by representors, the Council’s view is that it may have been a little optimistic in this respect, particularly in terms of the level of certainty and timescales for some prospective development sites. Some minor changes in assumptions in this regard are included in the in the SP1 (TED05) update to the trajectory. Nevertheless, in context, these site-specific assumptions should be seen as a substitute for a general large sites windfall allowance. It is very likely that some currently unknown larger urban redevelopment sites will emerge over a 15-20 year planning horizon. The NPPF encourages urban regeneration, effectively ‘brownfield first’ (now explicit in NPPF2018/19 Section 11). Either a site-specific approach, or a general allowance for larger windfall sites, is essential to recognise this.

2.12.5 **Council housebuilding.** It is suggested that the capacity of the Council to build is overplayed. Also, there may be a suggestion that the assumptions made double count some of the land available for this purpose with sites that will be developed privately. The Council accepts that this is a difficult contribution to predict. However, the

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published evidence (HNS2) Para. 277 on) shows the Council has an active building programme, with proven delivery. The sites already contributing to commitments and firmly planned for the future are included in the updated trajectory in SP1. The assumptions originally made for future delivery were very low, because they are cut off at the end of the current programme. Since preparation of the detailed trajectory in published evidence (HNS2) a Council decision has been made to fund an extended programme. This has now been included in the SP1 trajectory revisions. The extended programme will largely use small sites identified from within the Council’s existing estate, but it may also be necessary to acquire additional land. As a result, the assumed level of Council housebuilding is reduced from the programmed level (to 20 dpa), to avoid any possibility of double counting this land supply source. This means the revised assumption probably still underplays the potential council housebuilding contribution.

2.12.6 Vacant dwellings (long term empties) returned to use. Some suggest this is not a source that should be counted in a LP trajectory at all, as these are not new, additional, dwellings. This is considered in more detail in the Council’s response to the Inspector’s initial questions (TED02 Q4). The Council’s view is that it is crucial in a highly constrained Green Belt area to maximise all opportunities to make better use of existing stock. This can be done by reducing long term vacancy.

2.12.7 The Council’s overall aim in preparing the LP housing trajectory is to take a balanced perspective; not too optimistic, not too pessimistic. This is appropriate given the NPPF balance needed in a constrained Green Belt / rural District. Here greenfield land release has to be exceptional and minimised, rather than be seen as providing a potential excess of housing development opportunity to assist a supply boost, or as cover and comfort for delivery uncertainties. It is important to bear this in mind when considering the purpose of a trajectory. It certainly cannot be equated to a precise five-year land supply assessment (See the Council’s response to the Inspector’s initial question - TED02 Q4).

2.12.8 The balanced position taken in the LP trajectory can be illustrated by testing the effect of using some alternative assumptions. This testing is set out below (all in relation to the updated trajectory detail presented in SP1):

Five year supply assessment position now (1 April 2019 base date).

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This Table shows land supply now as calculated by the Council compared to an alternative calculation that includes a shortfall and reduces land supply by taking into account only readily deliverable sites (without the LP).

MHCLG (2019) standard method applies. 20% buffer applies (HDT outcome).

<table>
<thead>
<tr>
<th>Housing supply calculation</th>
<th>Council method (Document SP1)</th>
<th>Plan objector alternative method</th>
<th>Calculation (alternative in brackets)</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Annual requirement</td>
<td>648</td>
<td>648</td>
<td>MHCLG method</td>
<td></td>
</tr>
<tr>
<td>2. Annual requirement + 20% buffer</td>
<td>778</td>
<td>778</td>
<td>1. x 1.20</td>
<td>Rounded up</td>
</tr>
<tr>
<td>3. Five-year requirement + 20% buffer</td>
<td>3,888</td>
<td>3,888</td>
<td>1. x 5 x 1.20</td>
<td>(2.X 5)</td>
</tr>
<tr>
<td>4. Shortfall</td>
<td>NA</td>
<td>2,146</td>
<td>(based on insufficient completions over LP 2033 years 2013 – 19)</td>
<td>6 year requirement is 3666 - AMR completion figures 1,520 over 6 years</td>
</tr>
<tr>
<td>5. Total requirement</td>
<td>3,888</td>
<td>6,034</td>
<td>(3. + 4.)</td>
<td>(1,207 pa rounded up) (/5)</td>
</tr>
</tbody>
</table>

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43
<table>
<thead>
<tr>
<th><strong>6. Total supply</strong></th>
<th>1,505</th>
<th>1,285</th>
<th>1,285 is Deliverable sites without LP UC/TC regeneration sites (effectively windfall urban capacity only)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8. Number of years supply</strong></td>
<td>1.93</td>
<td>1.06</td>
<td>6./2. (6./5. p.a)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1. Includes plan-based shortfall (no plan)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. Assumes TC / UR sites not deliverable (unduly pessimistic)</td>
</tr>
</tbody>
</table>

Five-year land supply position showing comparison with adjusted, more pessimistic, trajectory assumptions and land supply outcomes

This Table shows the effect of all potential assumptions that favour the land owner / developer objectors that wish to see more Greenfield / Green Belt land allocated.

It shows the effect on five-year land supply, under a plan trajectory, of assumptions that a 20% buffer applies, a 10% lapse rate applies and less certain / more difficult to deliver urban land supply sources are not included.

(Sedgefield – shortfall made up in five-year period).
<table>
<thead>
<tr>
<th>Housing land supply calculation</th>
<th>Council method (Document SP1)</th>
<th>Plan objector alternative method</th>
<th>Calculation (alternative in brackets)</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Requirement from start of plan period</td>
<td>1,817</td>
<td>1,817</td>
<td>(303x6 rounded)</td>
<td></td>
</tr>
<tr>
<td>(b) Delivery 2013-2019</td>
<td>1,524</td>
<td>1,524</td>
<td>Net number of homes from AMR</td>
<td></td>
</tr>
<tr>
<td>(c) Shortfall</td>
<td>293</td>
<td>293</td>
<td>(a) – (b)</td>
<td>(b)</td>
</tr>
<tr>
<td>(d) 5 year requirement + Shortfall</td>
<td>1,808</td>
<td>1,808</td>
<td>(303x5 rounded =1515) + (c)</td>
<td></td>
</tr>
<tr>
<td>(e) Add buffer</td>
<td>1,898</td>
<td>2,169</td>
<td>(d) x 1.05 (or 1.20)</td>
<td></td>
</tr>
<tr>
<td>(f) Annualised average</td>
<td>380</td>
<td>434</td>
<td>(e) / 5 years</td>
<td></td>
</tr>
<tr>
<td>(g) Supply within 5 years</td>
<td>2,228</td>
<td>1948</td>
<td>See Document SP1 for details</td>
<td>2,228 - 280 (75 urban capacity / 145 town centres / 60 empty homes)</td>
</tr>
</tbody>
</table>

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Five-year land supply position after Plan adoption with adjusted, more optimistic, trajectory assumptions and land supply outcomes.

This Table incorporates all potential assumptions that favour the viewpoint that seeks minimum Greenfield / Green Belt development (if the LP requirement is taken as a given).

This table shows the effect on five-year land supply under a plan trajectory with assumptions that:

- a buffer is inappropriate due to the constraint context and buoyant housing market;

- Development of more difficult to deliver urban sites should be encouraged. This is shown as an increased urban regeneration / larger windfall sites assumption based on potential higher yields from the identified sites together with greater restructuring of town centres and redevelopment of lower quality employment areas (including redevelopment of previously developed land in the Green Belt)

- windfall assumptions should include a full allowance for garden land;

- Neighbourhood Plans will increase the number of Green Belt rural exceptions affordable housing site brought forward;

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- the yield from Greenfield Green Belt allocations will be is higher due to greater net development areas and higher densities being achieved.

The last of these assumptions is illustrated by the theoretical / general analysis of options for development of allocated Greenfield Green Belt sites (other than SGGC) at different densities at Appendix 2. Generally, the LP is deliberately cautious on yields. It assumes a very low average of 35dp ha density. Achieving higher densities after the initial five-year supply period, when more of these sites come forward could have a very significant effect on yields.

(Sedgefield – shortfall made up in five-year period).

<table>
<thead>
<tr>
<th>Housing land supply calculation</th>
<th>Council method (Document SP1)</th>
<th>Plan objector alternative method</th>
<th>Calculation (alternative in brackets)</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Requirement from start of plan period</td>
<td>1,817</td>
<td>1,817</td>
<td>(303x6 rounded)</td>
<td></td>
</tr>
<tr>
<td>(b) Delivery 2013-2019</td>
<td>1,524</td>
<td>1,524</td>
<td>Net number of homes from AMR</td>
<td></td>
</tr>
<tr>
<td>(c) Shortfall</td>
<td>293</td>
<td>293</td>
<td>(a) – (b)</td>
<td></td>
</tr>
<tr>
<td>(d) 5 year requirement + Shortfall</td>
<td>1,808</td>
<td>1,808</td>
<td>(303x5 rounded =1515) + (c)</td>
<td></td>
</tr>
<tr>
<td>(e) Add buffer</td>
<td>1,898</td>
<td>1,808</td>
<td>(d) x ? Buffer inappropriate</td>
<td></td>
</tr>
</tbody>
</table>

*Document Reference: TED04*

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<table>
<thead>
<tr>
<th>(f) Annualised average</th>
<th>380</th>
<th>362</th>
<th>(e) / 5 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>(g) Supply within 5 years</td>
<td>2,228</td>
<td>2,628</td>
<td>See Document SP1 for details</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2,228 + (50 - small windfall via garden land / 100 - additional large windfall sites - redundant employment land and town centres / 200 - greenfield sites yield increased / 50 Neighbourhood Plan led Green Belt affordable housing exception sites) Total =400</td>
</tr>
<tr>
<td>(h) Land Supply</td>
<td>5.86</td>
<td>7.25</td>
<td>g / f</td>
</tr>
</tbody>
</table>

2.12.9 It can certainly be argued that the submitted LP trajectory assumptions are too cautious. This might be a reasonable position to take on the basis that the NPPF generally (especially 2018/19) charges LPAs with maximising urban capacity and making efficient use of all land allocated. It could also be said that it is essential to show efficient land use is being achieved as part of the general development need case required to demonstrate exceptional circumstances for the level of Green Belt release proposed. Furthermore, the context is of a strong housing market that has shown its ability to deliver housing through regeneration.

**Document Reference: TED04**

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2.12.10 Changes in assumptions that are argued from different perspectives create a wide Plan trajectory five year supply range of 4.23 - 7.25 years supply. Overall this demonstrates that the Council has deliberately taken a cautious, middle ground position, in preparing its LP trajectory. It is suitably robust to respond to future, unexpected, change. The assumptions avoid over reliance on yield from urban areas, but pay proper regard to the continued importance of maximising urban regeneration and reducing pressure on greenfield Green Belt release. The assumptions for Green Belt release sites dwelling yields are modest. This allows for flexibility and inevitable variations in the final yield and some slippage in assumed timescales for development. It also gives scope for detailed planning that respects the character of the area, but still achieves the overall outcome of significantly boosting housing delivery.

2.12.11 However, the Council is open to any decision of the inspector that more optimistic trajectory assumptions should be applied, where that reflects the NPPF and the nature of the District.

2.12.12 It is entirely possible that, ultimately, LP housing delivery from the LP, especially as a result of successful urban regeneration initiatives and efficient land use at the greenfield / Green Belt release allocations, will be greater than the Plan requirement of 6056 dwellings. This will only be apparent at the planning application stage. Even with retained cautious assumptions, the revised trajectory in SP1 estimates that 6352 dwellings (317dpa) could now be delivered.

2.12.13 On that basis it is certainly not appropriate, to suggest that, to make the plan sound, it is necessary to move to the extreme of pessimistic assumptions suggested by some. Indeed, the possible consequences of this; either in setting a reduced plan requirement, or a suggestion that more Green Belt release is required, would in effect be more likely to make the plan unsound.

2.13 Is the contribution towards housing supply of housing from windfall, town centre initiatives and the predicted supply of 20 vacant dwellings per annum being brought back into use realistic and justified?

Response to Inspector’s Issues / Questions

2.13.1 This is mainly addressed in the Council’s response to Q2.12.
2.13.2 These are always difficult areas from which to predict a future contribution to housing supply. However, it would be remiss of any LPA proposing greenfield / Green Belt release for housing to ignore or minimise sources such as these. The Council has used a proportionate evidence base for forming its conclusions on these issues.

2.13.3 The assumed yield from each of these sources makes up only a small part of the trajectory (for the future housing programme excluding completions since 2013 – 4828 dwellings). Details of these sources and their relative importance are set out in published evidence (HNS2) and updated in SP1 (TED05) and can be summarised as follows:

- Windfall: 372 / 4828 = 7%
- Town centre initiatives: 277 / 4628 = 5.7%
- Long term empties reused: 240 / 4828 = 5%

Document Reference: TED04
Tandridge District Council Hearing Statement Matter 2
2.14 Is it justified that HSG20; North Tandridge: One Public Estate (NTOPE), Caterham is included in the housing trajectory?

Response to Inspector’s Issues / Questions

2.14.1 This is a current partnership urban regeneration project designed to rationalise publicly owned and used land within Caterham and potentially in other the northern urban areas of Tandridge.

2.14.2 Specific sites are being actively considered. Examples are:

- Douglas Brunton Centre (community / day centre) owned by TDC and Community Recycling Centre (CRC) on TDC / SCC land – at least 50 units
- Caterham Valley Library Site owned by Surrey CC – at least 60 units
- Caterham Dean Community Hospital Site owned by HNS – at least 30 units

2.14.3 The trajectory assumptions made reasonably assume the likely release of these sites for housing redevelopment with a quite modest yield assumption of approximately 80 dwellings, as part of the town centre initiatives assumption. The assumption is general, rather than site specific to reflect the level of uncertainty about precisely which sites will be redeveloped.

2.14.4 The project is an essential contribution to urban regeneration and will certainly result in some new urban capacity for housing. The contribution is a small element of the total trajectory: \((82 / 4828 = 1.6\%)\) of the revised SP1 trajectory. If delivery is lower or higher than expected, this should not be seen as fundamental to the appropriateness of the trajectory. The Council will be continuously monitoring potential outcomes. During the plan preparation process it has already adjusted its yield downwards on a precautionary basis; from 150 (HNS7).

2.14.5 More details of the project are provided in published evidence (HNS2 Para. 275).

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Tandridge District Council Hearing Statement Matter 2
2.15 In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence of viability?

Response to Inspector’s Issues / Questions

2.15.1 Tandridge is a high value housing market with very favourable locational and environmental attributes. Subject to general, cyclical, housing market fluctuation the market is buoyant and homes achieve high sales values. This makes housing development highly viable in all but the most unusual, site specific, circumstances. The viability position is detailed in published evidence (INF15).

2.15.2 Inevitably, a major factor in viability is the affordable housing level and type required by planning obligations. This is dealt with explicitly in LP Policy (Policy TLP05 /12) and through application of different affordable housing requirements between urban and greenfield affordable housing requirements, plus appropriate caution about affordable delivery at SGGC. This reflects the evidence (INF15 Paras. 6.5 / 6 especially).

2.15.3 Housing development proposals in the Plan can be divided into three groupings with respect to viability and the impact of affordable housing requirements:

Medium / small greenfield Green Belt sites at the edge of existing urban areas: The Housing and Employment Land Availability Assessment (HELAA) submissions demonstrate that landowners / promoters regard these sites as viable for the form of development proposed in the Plan, including with high levels (normally 40%) of affordable housing provision. The Council is currently working with parties responsible for the development of the major sites to agree ‘Statements of Delivery’ that can consolidate mutual understanding of the details of housing development, including planning requirements and obligations for the site. These will be finalised alongside adoption of the plan and can form a basis for speedy progress in implementing viable developments.

SG Garden Community (SGGC): Special circumstances apply to SGGC as this is a new settlement proposal with particular, more challenging, issues of land assembly, land value equalisation and infrastructure costs. Nevertheless, published evidence (SAD2 / INF2) demonstrates general land availability and development viability with a good level of affordable housing included in development (35 – 40%). The Council accepts that the provision of affordable housing at SGGC is a viability related matter that needs to be finalised through
further work on the proposed Area Action Plan (AAP) and on implementation arrangements (Policy SGC01). There is also a viability relationship / balance with the methods and funding available to deal with infrastructure provision required. The Council is actively seeking additional funding streams for infrastructure, to be able to maximise available land value capture for all requirements of the development. This is position detailed elsewhere in the Council’s Hearing Statements and evidence. Taking account of this detail, SGGC is clearly viable with all infrastructure cost included and with a minimum of 35% affordable housing.

Redevelopment / regeneration in existing urban areas: For redevelopment sites, the evidence (INF15) shows there is every prospect of achieving viable developments, but it is appreciated that circumstances will vary due to the existing use values and higher costs involved in many forms of urban redevelopment. The Plan specifically accepts that such sites will deliver lower levels of affordable housing (20%)

2.15.4 Overall there can be no doubts about viability of the LP housing development proposals.
2.16 Given that the proposed South Godstone Garden Community is intended to deliver around 1,400 new homes in the Plan period and the details of the development would be considered by an Area Action Plan (AAP), would it be effective to include within the Plan a Policy which commits the Council to a review of the Plan if the AAP is not adopted by a specified date in order to sustain the supply of housing?

Response to Inspector's Issues / Questions

2.16.1 There is a new statutory requirement to review Local Plans every five years (Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017). For this reason alone, it would appear that an additional LP policy requirement is procedurally unnecessary. The Council would wish to understand the additional merit arising from a policy requirement specifically related to the SGGC.

2.16.2 In considering this issue there are some deeper, substantive, reasons why such a requirement would be undesirable and / or lack benefit. This makes the Council cautious of such a modification:

- The concept of a ‘review’ ‘in order to sustain the supply of housing’ raises serious concerns. The LP gives a very clear, in principle, commitment that a strategy of Greenfield / Green Belt release for a specific location; SGGC, causes least harm to the Green Belt. This is a fundamental decision that should not, in any way, be questioned as being the best long-term approach. If this is accepted through Examination, there will be no alternative development strategy. The long term, location specific, balance of development need and Green Belt boundary change exceptional circumstances will have been fixed. The LP is submitted on the basis that there is no better approach.

- The only effective way to prepare an AAP (with master planning) is alongside work with land and development interests on the best method of implementation. This will be a collaborative process designed to resolve inevitable land acquisition / assembly, value equalisation, planning requirement / obligation and phasing issues.

- An absolute five year timetable requirement to create the AAP puts an artificial deadline on what may be a complex and challenging process.

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Tandridge District Council Hearing Statement Matter 2
A policy indicating a five-year review in relation to SGGC would introduce a serious element of policy uncertainty from the very outset of an ambitious new, long term, plan. The suggestion would effectively be that, in just five years, there would be a possibility that the plan to create SGGC could be reversed or changed significantly. That is not conducive to certainty that SGGC will happen, even if the time taken extends somewhat (possibly due to a cyclical downturn in the housing market arising from external national or global economic conditions). Infrastructure investment will probably have started. Alternative development strategies would have been only very recently rejected. Policy clarity and certainty is absolutely necessary to implement a strategic development approach of this kind. In particular, this is essential to encourage land and infrastructure provider interests to participate.

2.16.3 Any delay in implementing SGGC may not be ideal, but it should not be seen as, in any way, questioning the correctness of the strategy advanced in the Plan

2.16.4 That said, the Council is confident that it can tackle all the issues involved in preparing the AAP and achieving a start on SGGC by 2026. However, the success of SGGC is partly dependent on a background of certainty that, even if timescales turn out to be longer than expected, the approach will continue until problems have been overcome. That view fits with the Council’s declared intent to be interventionist on delivery of SGGC. Appropriate preparation is already in hand to that end (SAD2 and progress since noted elsewhere in the Council’s responses).

2.16.5 Should implementation problems arise with SGGC, or indeed any other Green Belt releases, any delay would necessarily be considered in the statutory review process. This would be on the basis of a review of policy compliant sources of supply, and the potential to increase yields (see points in the Council’s response to Q2.11 about the scope to do this).
Evidence

HNS2 - Tandridge Local Plan 2033 Housing Topic Paper 2019
HNS7 - Regulation 19 Housing Topic Paper Addendum 2018
HNS11 - Affordable Housing Needs Assessment for Tandridge Updated 2018
HNS23E - Calculations to reflect 2016 based household projections
INF2 - Tandridge District South Godstone Garden Community Financial Viability Assessment 2018
INF15 - Tandridge Draft Local Plan Viability Assessment 2018
SAD2 - Garden Community Delivery Approaches Briefing Note 2018
TED02 – Response to Inspector Documents ID2 and 3

Supporting papers (SP) (as separate documents)

TED05 - SP1 Five Year Housing Land Supply and Housing Monitoring Position April 2019

Appendices

Appendix 2 Comparative Dwelling Yield Assumptions (Allocated LP Sites)
D: Five year housing land supply

_Issue:_ Would the Plan secure a five year supply of deliverable housing sites?
2.17 Will the Plan provide for a five year supply of deliverable housing sites on adoption?

Response to Inspector's Issues / Questions

2.17.1 On all reasonable assumptions, it will. This Question is addressed under Q2.12 above.
2.18 In the context of paragraph 47 of the Framework, is it justified to apply a buffer of 5% within the calculation of the five year supply?

Response to Inspector's Issues / Questions

2.18.1 This Question is addressed in the Council's ‘Response to Inspector Documents ID2 and 3’ (Inspector's Initial Questions TED02; Q3) and under Q2.12 above.
2.19 What are the implications of the Housing Delivery Test for the five year supply of housing after the Plan is adopted, having regard to the application of the appropriate buffer as set out in paragraph 73 of the revised updated National Planning Policy Framework 2019?

Response to Inspector’s Issues / Questions

2.19.1 This Question is addressed in the Council’s ‘Response to Inspector Documents ID2 and 3’ (Inspector’s Initial Questions - TED02; Question 3). Additionally, the publication of the Council’s HDAP (see responses to matter 2C above) provides further relevant background information, especially in respect of the importance of adopting the LP as the central action.
Evidence

As for Matter 2C questions

Supporting papers (SP) (as separate documents)

TED05 – SP1 Five Year Housing Land Supply and Housing Monitoring Position April 2019

Appendices

Appendix 2 Comparative Dwelling Yield Assumptions (Allocated LP Sites)
E: TLP:12 Affordable Housing Requirement

Issue: Is the OAN for affordable housing justified and in line with national policy and guidance?
2.20 Does the SHMA's approach to calculating affordable housing need, comply with the stages set out in the Planning Practice Guidance?

Response to Inspector's Issues / Questions

2.20.1 The approach is fully compliant with the PPG (ID: 2a-022-20140306 and following paras.), as explained in published evidence (HNS 11 with updated calculations in HNS23E). HNS 11 says ‘this paper has been prepared to comply with the current - June 2018 - NPPF and PPG’ (Paras.1.3-4). This approach encompasses the 2012 related PPG guidance as there is no significant change.

2.20.2 It has been suggested by some respondents that the published evidence may underestimate affordable housing need by over counting elements of supply. This is debatable on technical grounds. However, even if that is correct, the Council fully accepts that affordable housing need is very substantial and dominates overall need.

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2.21 Policy TLP12 sets affordable housing requirements for developments within the Tiers 1 and 2 of the settlement hierarchy, in respect of sites released from the Green Belt and elsewhere. Would the policy be effective in ensuring the OAN for affordable housing is met?

Response to Inspector’s Issues / Questions

Considerations include:

- Are the affordable housing requirements set at levels which maximise the delivery of affordable housing whilst not affecting the deliverability and viability of the Plan?

2.21.1 This Question is addressed under Q2.15 above. See also the Council’s response to bullet point 3 below.

- Is there a need to increase the housing requirement to help deliver more affordable housing?

2.21.2 No. Such a suggestion is completely contrary to NPPF imperatives on balancing provision of housing with constraints and the ‘exceptional circumstances’ justification required for Green Belt release. To have a significant effect on affordable provision levels, a large increase in market housing would be necessary. This would significantly increase environmental and Green Belt harm. It would also increase infrastructure pressures. This Question is addressed in detail under Q2.3 (in the context of the representor suggestions of making affordable housing uplifts to OAN).

- What is the justification for the 15 dwellings or over threshold in Tier 1 settlements?

2.21.3 Tier 1 settlements are excluded from the Green Belt and are the most sustainable locations, where housing redevelopment and infill is to be most encouraged. However, these areas are also those where land values based on existing use are highest. This

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affects viability for affordable housing provision (see the Council’s response to Q2.15 on viability of housing development generally). This higher site size threshold for affordable provision creates a powerful incentive for housing delivery. This is appropriate as the smaller scale windfall schemes can make a very important contribution to overall housing supply in Tandridge (including for the small scale builders, custom and self-builders - new priorities in the NPPF 2018/19 – bullet below refers), but do have to be very well designed to integrate into existing neighbourhoods and communities and deal with site redevelopment, demolition and contamination issues. This means they bear higher costs. This approach reflects the Council’s experience of Development Management decision outcomes, including viability based negotiation of affordable housing and past outcomes in the District.

- Is the policy justified in applying the affordable housing requirement to housing sites of five dwellings and over outside of Tier 1 and Tier 2 settlements and sites allocated as Green Belt Releases and is it consistent with national policy set out in the Written Ministerial Statement (WMS) of 28 November 2014 and the Planning Practice Guidance (031 Reference ID: 23b-031-20160519) on support for small-scale developers, custom and self-builders (or the Framework 2019)?

2.21.4 Yes. This WMS / PPG should be taken as guidance only, applicable to the majority of housing developments. Policy TLP 12 applies the PPG threshold (10 dwellings and over) as a minimum for affordable housing provision in all locations bar ‘any site not in the above categories (list covering the vast majority of development potential) but excluding rural exceptions’.

2.21.5 For rural exceptions (in Tandridge they are Green Belt rural exceptions), a completely different policy approach, which maximises affordable provision applies (NPPF Para.54). Effectively this approach is beyond normal policy – including the policy on affordable thresholds referred to in the question.

2.21.6 The TLP05 dwelling threshold (which is a justifiable departure from the WMS guidance) is applicable in only very limited cases. First, in parts of the District that are Areas of Outstanding Natural Beauty (AONB), policy and guidance (2018 / 19 PPG ID: 23b-031-20160519) specifically provides for a lower, 5 dwelling threshold (or a locally defined threshold). Second, the remaining cases are those in the Green Belt under NPPF Para 89 ‘inappropriate development exception’ categories (limited infill / partial

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or complete redevelopment of previously developed sites). The approach to these sites is explained at LP Para.18.3.

2.21.7 There is an overriding policy of strict limitation on housing development in Green Belt, meaning the developments are likely to be small and/or on sites with a low existing use value. This makes a lower threshold for affordable provision readily justified and unlikely to affect viability. This is supported by published LP evidence on viability (INF15 - See the Council’s response to Matter 2C Qs). If, in an individual case, viability is a genuine problem (possibly in a redevelopment of a more valuable commercial site) then Policy TLP12 allows for negotiation based on a viability assessment (penultimate paragraph).

2.21.8 Overall, this is a positive and realistic, viability aware, approach to affordable housing provision though market development of small sites in Green Belt. It will enhance opportunities for ‘small-scale developers, custom and self-builders’.

- The Policy states that the tenure and size split will be determined by the Council’s most up to date Housing Strategy. Is the Policy, in requiring compliance with the Housing Strategy consistent with national policy given that the Housing Strategy is not part of the development plan?

2.21.9 The Housing Strategy is an expression of the Council’s corporate policies and actions on housing regulation, provision and management. It also provides regularly updated evidence on the housing profile and issues of Tandridge. The Strategy is not a planning policy document. TLP 12 policy wording should therefore be read as ‘determined by … the evidence … set out in the … Housing Strategy’. The proposed Minor Modifications to the policy, replacing; ‘will be determined by’ with ‘as set out in’ are intended to make the position clearer. Policy TLP10 also clarifies the role of the Housing Strategy and the Council’s proposed (now suggested Main - TED02) Modifications to this policy reinforce its interpretation, in a planning context, as evidence only. This is done by using wording ‘should take account of’ / ‘should be informed by’.

2.21.10 There is no definitive NPPF / PPG position on using supporting information and evidence related documents to assist in implementation of Local Plan policy. The only
guidance is general, on pure policy content, and is related to formal Supplementary Planning Documents (SPD) (NPPF Para.153).

2.21.11 The Council’s view is that its approach does not seek to elevate the supporting documents it refers to as a form of planning policy. The supporting documents are intended to provide evidence, information and best practice sources that will be useful reference points in making Development Management decisions. They are very important to evidence based planning decisions. The Council’s always intends to negotiate good planning outcomes on an evidential basis. All material considerations will apply at the point of decision and the content of the supporting documents will never be taken as policy.

2.21.12 It is preferable to use supporting documents in cases such because they can be readily and regularly updated to reflect the latest evidence. In addition, references to supporting documents of this kind are beneficial in achieving the NPPF / PPG recommended strategic, concise and focused form of Local Plan (PPG ID: 12-010-20140306). This is a quite normal approach to Local Plans depending on circumstances and the need for update and flexibility.

2.21.13 However, if it is the Inspector’s view that the policy wording should be clarified to:

- refer to ‘evidence’ from the Strategy (as suggested above) and / or;

- include parts of the Housing Strategy on tenure and size split in the Policy,

then the Council is open to that coming forward as a recommended Main Modification. Size / type / tenure mix tabulations (SHMA based) for that purpose are suggested below:

**Housing Strategy**

**Table 3: Size of Housing required in Tandridge (up to 2033)**

<table>
<thead>
<tr>
<th></th>
<th>1 bed</th>
<th>2 beds</th>
<th>3 beds</th>
<th>4+ beds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proportion of households requiring...</td>
<td>10%</td>
<td>26%</td>
<td>35%</td>
<td>29%</td>
</tr>
</tbody>
</table>

**Table 4: Size of Accommodation Required 2013-2033**

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**Document Reference: TED04**

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<table>
<thead>
<tr>
<th>All ages</th>
<th>% of need for type</th>
<th>% of total need</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Detached</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 or less bedrooms</td>
<td>1,323</td>
<td>39%</td>
</tr>
<tr>
<td>4 bedrooms</td>
<td>1,277</td>
<td>38%</td>
</tr>
<tr>
<td>5 or more bedrooms</td>
<td>767</td>
<td>23%</td>
</tr>
<tr>
<td><strong>Semi-detached</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 or less bedrooms</td>
<td>569</td>
<td>22%</td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>1,548</td>
<td>59%</td>
</tr>
<tr>
<td>4 or more bedrooms</td>
<td>502</td>
<td>19%</td>
</tr>
<tr>
<td><strong>Terraced</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 or less bedrooms</td>
<td>520</td>
<td>40%</td>
</tr>
<tr>
<td>3 or more bedrooms</td>
<td>784</td>
<td>60%</td>
</tr>
<tr>
<td><strong>Flat</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bedroom</td>
<td>706</td>
<td>38%</td>
</tr>
<tr>
<td>2 or more bedrooms</td>
<td>1,156</td>
<td>62%</td>
</tr>
</tbody>
</table>

**Affordable Housing – Tenure Split**

Affordable or social rented housing – no less than 75%
Low cost home ownership delivered as shared ownership housing – up to 25%

Affordable housing split of types and dwelling size to be provided:

1. Affordable Housing for Rent / Social rent
   
   **Dwelling mix:**
   a. 10%-20% 1 bed 2 person dwellings
   b. 45%-55% 2 beds 4 person dwellings
   c. 25%-35% 3 beds 5 person dwellings

2. Intermediate Sale
   
   **Dwelling Mix:**
   a. 20%-30% 1 bed 2 person dwellings
   b. 60%-70% 2 bed 4 person dwellings
   c. 10%-20% 3 bed 5 person dwellings

**2.22 Are the proposed Modifications to Policy TLP12 necessary for soundness?**

*Document Reference: TED04  
Tandridge District Council Hearing Statement Matter 2*
Response to Inspector’s Issues / Questions

2.22.1 The Council’s general approach to proposed Modifications is detailed in Examination Document TED01 (prepared as part of the Council’s response to the Inspector’s initial questions (ID 2 and 3).

2.22.2 The Council’s view is that the substantive wording change set out in the TED01 (Part 1 Schedule - Page 20), on artificial sub-division of sites to avoid affordable housing provision, is a Main Modification necessary to make the plan sound. This is because it addresses a significant policy interpretation problem experienced in Development Management practice. If this problem is not addressed in policy wording, then decisions taken will potentially hinder much needed affordable housing provision (an NPPF priority - Para.159). The other proposed modifications to this Policy are clarifications only and can be made by the Council as minor / other modifications at LP adoption (TED01 Para.7a).
Evidence

HNS1E - Tandridge Housing Strategy 2019-2023 Feb 2019
HNS11 - Affordable Housing Needs Assessment for Tandridge Updated 2018
HNS23E - Calculations to reflect 2016 based household projections
TED01 – Schedule of Proposed Main Modifications (May 2019)
TED02 – Response to Inspector Documents ID2 and 3

Supporting papers (SP) (as separate documents)

None

Appendices

None
F: Provision for Gypsies, Travellers and Travelling Showpeople

Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, travellers and travelling showpeople?
2.23 Has the need for additional pitches and plots been robustly calculated and has provision of pitches and plots changed since the Tandridge District Council Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken?

Response to Inspector's Issues / Questions

2.23.1 Yes. The Council's approach to the calculation of gypsy and traveller accommodation needs is prepared in accordance with the most up to date national policy, is robust and uses all the available evidence. There have been some small changes to provision since the Gypsy and Traveller Accommodation Assessment (GTAA).

2.23.2 This response (and other responses to questions on this topic) should be read as an update of the Council’s response to the Inspector’s initial question (Q5) on this topic (Examination Document TED01).

2.23.3 The need for pitches and plots within the District has been calculated as part of the Council's GTAA (SAD14) published in 2017. To assist the Inspector in understanding the detailed issues involved in the GTAA and provision since the study, the Council has prepared a Supporting Paper (SP2 ‘Evaluation of the Gypsy and Traveller Accommodation Assessment 2017 and TDC’s Approach to Traveller Applications’ published as Examination Document TED06) to complement the responses to the Inspector's questions on this topic: Section 1 of the SP addresses the Council’s approach to the allocation of sites. Section 2 explains the evolution of the Council’s GTAA work and the context for SAD14. Section 3 provides an update to the number of pitches and plots recorded on sites at the latest caravan counts undertaken by the Council since SAD14 and in the context of the latest planning application / appeals and provision position.

2.23.4 Section 2 of the SP shows that the base data used in the study was accurate and that the assumptions used to calculate the need were reasonable. Whilst the GTAA 2017 shows a drop in in level of need for Gypsies and Traveller pitches within the District since the earlier study (2013), this is due to the application of the new definition as set out in Planning Policy for Traveller Sites (PPTS) 2015, along with the use of a more sophisticated method for determining family formation rates. Both these changes are well justified by the available evidence and relevant to plan-making requirements. The
Council is confident that the need for additional pitches and plots within the District has been robustly calculated in the terms set by the PPTS.

2.23.5 As set out in the SP there has been a change in the provision of pitches and plots in the District since SAD14 was undertaken; an increase of 9 authorised Gypsies and Traveller pitches.
2.24 Will a five year supply of specific deliverable sites for gypsies, travellers and travelling showpeople be provided on adoption of the plan?

Response to Inspector's Issues / Questions

2.24.1 Yes. The estimated need is already provided for in permissions granted.

2.24.2 Section 3 of the SP outlines the recent supply of 3 authorised sites (9 pitches). The table below shows an updated trajectory based on the current evidence and most recent planning data:

<table>
<thead>
<tr>
<th>Years</th>
<th>0-5</th>
<th>6-10</th>
<th>11-15</th>
<th>16-17</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016-21</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GT pitch need for those meeting the PPTS definition in SAD14</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Supply of authorised pitches</td>
<td>9</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>9</td>
</tr>
</tbody>
</table>

2.24.3 The table shows that the Council has already provided for its five year need for gypsy and traveller pitches within the District. It is acknowledged that 1 site (4 pitches) was allowed on appeal, but 2 sites (5 pitches) have been granted permission by the Council under the criteria based Policy CSP9 currently in place in the Development Plan (Tandridge Core Strategy). Section 3 of the SP provides the details of the authorised pitches.

2.24.4 The Council accepts that the five year supply for Travelling Showpeople is unlikely to be met on adoption of the plan, but considers that given the scale of requirements for
Travelling Showpeople’ that this can be most effectively be met as part of the development of the South Godstone Garden Community (SGGC).
2.25 Given the identified need in the GTAA for plots and pitches in the first five years of the plan period, is it justified to make specific provision only through the proposed South Godstone Garden Community, which is not anticipated to deliver homes until the later part of the plan period? To be positively prepared, should the Plan make provision for the identified need for additional pitches and plots through one or more site allocations?

Response to Inspector's Issues / Questions

2.25.1 The Council's approach is justified given the Green Belt policy context and the scale and form of need. Making provision by Green Belt release of available small sites would not meet the outstanding need and would be very harmful to Green Belt purposes.

2.25.2 As outlined in the response to Q2.24 above, the five year supply for gypsy and traveller pitches has been met. Therefore the response to this question will focus on Travelling Showpeople.

2.25.3 Accommodating the assessed needs of Travelling Showpeople in Tandridge is a challenge, due to the scale of need and the requirement for both living accommodation and potentially sizeable yard / open storage areas. The Green Belt and environmental impacts of provision would be significant. SGGC provides the best opportunity to accommodate the unique requirements of Travelling Showpeople as part of a planned Green Belt release and comprehensive development.

2.25.4 Provision at SGGC is considered to be the only realistic approach given the planning constraints in the District and the conflict that therefore arises with the policies of the PPTS. The PPTS (Para. 10a) requires allocation of specific deliverable sites sufficient to provide 5 years' supply. However in Policy E Paras.16 and 17 state that sites in the Green Belt are inappropriate development and that Green Belt boundaries should only be altered in exceptional circumstances and to 'meet a specific, identified need for a traveller site'. Given that; the whole District outside of the main built up areas is Green Belt, there are recognised difficulties in locating traveller sites immediately adjacent to existing settlement boundaries (PPTS Para.11) and there are practical land availability issues, the opportunities for allocating (a) sizeable site (s) within the District are very limited. Footnotes 4 and 5 of the PPTS make relevant comments on the practical issues about deliverability and developability of sites.
2.25.5 Section 1 of the SP notes potential options for site allocations and the possibility of allocating sites as part of LP housing allocations (other than SGGC). Sites for Gypsies and Travellers submitted through the Housing and Employment Land Availability Assessment (HELAA) were assessed as part of the Green Belt Assessment - GBA - (Part 3): Appendix 1 (2018) (GB2).

2.25.6 For the individual sites assessed as part of GB2 it was concluded that the exceptional circumstances needed to justify the allocation of stand alone Gypsy and Traveller sites in the Green Belt do not exist. In addition to this, the sites assessed as part of GB2 were quite small and not submitted, nor generally appropriate, to accommodate the particular requirements of Travelling Showpeople.

2.25.7 In assessing other allocation opportunities; apart from the SGGC, the LP housing allocation sites are not large enough to accommodate Traveller allocations. In its guidance on the housing needs of different groups the 2018/19 PPG (ID: 67-001-20190722) highlights that ‘when producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.’ The scale of need for Traveller Showpeople, as well as practical requirements in terms of plot sizes and impact on neighbouring uses rules out part use of Green Belt general needs housing allocations. Requiring these sites to accommodate Traveller need would certainly adversely impact on their deliverability as well affecting as the overall levels of housing proposed in the District.

2.25.8 The LP therefore includes realistic policies and proposals that will meet all the needs for additional pitches and plots identified in SAD14, whilst taking necessary account of both NPPF / PPTS policy constraints and practical deliverability.
2.26 Given that much of the District is within the Green Belt, would a reliance upon criteria based policy and allocation through the AAP be positively prepared and effective in meeting the identified need? To be effective, should Policies TLP15 and TLP16 also address proposals in the Green Belt?

Response to Inspector’s Issues / Questions

2.26.1 Criteria based policy and allocation through the AAP is the most effective approach to meet Gypsy, Traveller and Travelling Showpeople needs given the scale and nature of need and constraints within the District. The policy commitment to an allocation at SGGC is NPPF positive.

2.26.2 Paragraph 18.39 of the LP (MD1), which forms part of the reasoned justification for Policy TLP15, states that:

‘To ensure appropriate and necessary consideration of traveller sites can take place, the criteria-based policy set out below will be used to determine whether the very special circumstances exist for development within the Green Belt. This can be considered on a case-by-case basis and on reflection of national policy and the identified need set out within the GTAA (2017). This approach allows public consultation to take place on individual sites through the planning application process and each site will be considered on its own merits’.

2.26.3 The criteria-based policy approach is intended to guide Development Management consideration of traveller sites, pitches and plots across the District, including within the Green Belt, on a case-by-case basis. Paragraph 11 of the PPTS specifically supports a criteria-based approach where there is no identified need, but to provide a basis for decisions in case applications come forward. Other than for show people need in Tandridge is relatively modest and now met (Response to Q 2.24). In a Green Belt area a criteria based policy is the best way to enable small-scale sites to be permitted where NPPF very special circumstances can be shown to apply and to ensure that this specialist accommodation is only permitted for those who meet the planning definition as set out in the PPTS.

2.26.4 It is envisaged that allocation of traveller sites through the SGGC Area Action Plan (AAP) would primarily seek to meet the needs of Travelling Showpeople, (an identified need of 21 plots - SAD14). Paragraph 18.41 of the LP highlights the specific

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requirements of Travelling Showpeople, who often live alongside their equipment and therefore need sites capable of accommodating this. The need to store large vehicles and equipment on plots added to the level of need for Travelling Showpeople identified in SAD14 suggests that a relatively large area of land is required. The SGGC AAP provides the flexibility in land choice to find a suitable area that would meet this need.
2.27 Are Policies TLP15 and TLP16 justified and consistent with National Policy?

Response to Inspector’s Issues / Questions

2.27.1 Yes, the policies are justified and consistent with national policy.

2.27.2 National policy is mainly set out within the PPTS. PPTS Para.11 supports a criteria based approach to guide land supply and provide a basis for decisions on applications that come forward (TLP15). PPTS Para.10 (d&e) suggests that Local Plans should ensure the number of pitches or plots relate to the specific size and location of the site, and protect the local amenity and environment. PPTS Para. 26 (points a-d) require that, in determining applications, weight is given to the design of sites. The criteria set out in TLP16 are necessary to guide development management consideration of essential, special, design requirements for Traveller sites.
**TLP15: Gypsy, Traveller and Showpeople Provision**

2.28 Is the requirement that the applicant should clearly demonstrate need in criterion II consistent with the Planning Policy for Traveller Sites and does it accord with the Public Sector Equality Duty when proposals for general housing do not need to demonstrate need?

**Response to Inspector’s Issues / Questions**

2.28.1 Housing need is a central consideration in NPPF plan making and decision taking (NPPF Para 47). The consideration applies equally to general housing and specialist accommodation for Travellers. This is particularly relevant in respect of housing proposals that harm Green Belt, where housing is normally inappropriate and either exceptional circumstances or very special circumstances have to be specifically demonstrated. Need is a necessary and usual start point to demonstrate such circumstances (NPPF Paras. 83/88).

2.28.2 However, the specific purpose of TLP15 criterion II is much more focused; it is to seek information from applicants regarding their special PPTS definition Traveller individual circumstances and accommodation needs; especially in relation to the number of pitches/plots proposed on a site. Information in relation to the size, type and tenure of the pitches/plot sought is also required. Decisions must take account of this information to ensure that the proposed development is justified and proportionate in relation to the need of the applicant. This could support a very special circumstances case to permit a site within the Green Belt. More general consideration of accommodation need would be with reference to the GTAA and plan provision under Policy TLP Policy15. This is confirmed in paragraph 18.39 of the LP (MD1), which outlines that applications can be considered on a case-by-case basis and on reflection of the need as set out in the GTAA 2017 (SAD14).

2.28.3 The requirements of this policy would not be out of line with justification for any other development on an unallocated site, especially within the Green Belt. Any application would be required to provide information sufficient to enable to consideration of whether housing need outweighed other material considerations. The criterion is considered to accord with the Public Sector Equality Duty in ensuring there would be

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no discrimination, and that there would be equality of opportunity between persons who share a relevant protected characteristic and persons who do not.

2.28.4 It is also relevant to note that:

‘the Government changed the definition of ‘traveller’ in PPTS 2015 for planning related purposes so that it would excludes those who have permanently ceased from travelling. It the consultation response to the changes the Government said that it believed “it is fair that if someone has given up travelling permanently then applications for planning permission should be considered as they are for the settled community within national planning policy rather than Planning Policy for Traveller Sites.”’ (Parliamentary Briefing paper on Gypsies and travellers: planning provisions (number 07003, 13 October 2017).

2.28.5 It is therefore necessary for the Council to ensure that the need for special accommodation is clear on this basis. This prevents development that is not needed in terms of this specific national policy.
2.29 Should the Policy cross reference TLP47 in respect of flood risk?

Response to Inspector’s Issues / Questions

2.29.1 Any application for development should be considered against the national policy and the LP as a whole; so the cross reference is not strictly necessary. However, should the Inspector feel that a cross reference to TLP47 would clarify the policy, the Council would be happy to include this (suggested as a minor or other modification made on the adoption of the LP).
TLP16: Traveller Pitch/Plot Design

2.30 Would TLP16 be effective and consistent with national policy through referring to the withdrawn Good Practice Guidance?

Response to Inspector’s Issues / Questions

2.30.1 Yes. Specialist guidance is essential to good planning for Traveller site provision and design. The reference in the policy is general; it is to ‘good practice guidance’, thus allowing for use of the most up to date official source available at the time the policy is applied. The principles of referring to a document not included in the LP itself are the same as those set out in relation to the Housing Strategy at Q2.21. It makes no sense to replicate national level guidance in the Plan itself or provide local guidance. The Council consider the policy approach to be taken in TLP16 to be consistent with and effective in addressing the requirements of the PPTS Paras. 10 and 26.

2.30.2 As outlined in paragraph 18.42 of the LP (MD1), application of Policy TLP16 would currently be based on ‘Designing Gypsy and Traveller Sites: Good Practice Guide’ (2008), as this is the most up to date source. There is no other guidance on design standards for Gypsy and Traveller pitches and sites.

2.30.3 The Council recognises that the Guide continues to reference withdrawn Planning Policy Statement 3: Housing and other elements of the pre NPPF planning system. That said, the design matters dealt with in the document transcend general policy changes. The detailed design standards in the Guide make the document very beneficial to, and effective in, the planning process. It is an authoritative and very valuable source and remains a legitimate tool in the absence of anything else official and / or more up to date.

2.30.4 Furthermore, as outlined in paragraph 1.8 (of the Guide), the document was developed in consultation with members and representatives of the Gypsy and Traveller communities. The Guide ‘draws attention to those elements which have been found to work best in developing sites which will be consistent in the long term, and which meet residents’ traditional and cultural needs’. By continued use of the Guide the design elements of planning decisions can be addressed on a well informed basis, with the

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support of the community affected. The Guide will be particularly valuable in implementation of the proposal for Traveller provision through the SGGC AAP.

2.30.5 The policy itself is reasonable and measured in its approach and provides criteria which are more relevant to the special accommodation preferences of the Gypsy and Traveller / Travelling Showpeople community, rather than the general design policy for development in Policy TLP18.
2.31 Would the Policy criteria be effective in achieving good design?

Response to Inspector's Issues / Questions

2.31.1 Yes, especially when considered in relation to the ‘good practice guidance’ (Q2.30).

2.31.2 The criterion of TLP16 relate to appropriate boundary treatment and landscaping; appropriate pitch/plot layout to ensure the safety and security of residents; safe access; provision of utilities; contaminated land; impact on the health and living conditions of residents or on / from neighbouring uses; appropriate scale of built development; appropriate scale of pitches/plots for the size and numbers of caravans without overcrowding or unnecessary sprawl; and provision of adequate space or gardens. The criteria are not overly prescriptive, but provide an essential check list to inform detailed Development Management consideration.
2.32 Is it necessary to include criterion V given that contaminated land is covered within TLP15? Would criterion V be effective as it does not seek that a contaminated site is remediated prior to occupation?

Response to Inspector’s Issues / Questions

2.32.1 It is acknowledged that contamination on Traveller sites is covered in both Policy TLP15 regarding general provision of sites as well as in criterion V of Policy TLP16, which is more specific to matters of site/pitch/plot design. It is considered that whilst, the purpose of criterion V has already been covered in TLP15 this does demonstrate consistency across policies. There is also a special relevance to Traveller sites, as they can sometimes develop from initially unauthorised use of sites that ultimately prove unsuitable for residential purposes as a result of contamination from a previous use. That said, should the Inspector feel that this criterion should be removed from Policy TLP16, the Council would be happy to do this (suggested as a minor or other modification made on the adoption of the LP).
Evidence

GB2 - Green Belt Assessment (Part-3) Appendix 1 2018

SAD10 - Housing and Economic Land Availability Assessment 2017-2018 Appendix 7 Traveller Sites

SAD14 - Tandridge District Council Gypsy and Traveller Accommodation Assessment 2017

(GTAA 2013 – see SP2 – below for this reference)

SAD22 - Housing Economic Land Availability Assessment 2016 Appendix 7 Traveller Sites

Parliamentary Briefing paper on Gypsies and travellers: planning provisions (number 07003, 13 October 2017)

Supporting Papers (as separate documents)

TED06 – SP2 Evaluation of the Gypsy and Traveller Accommodation Assessment 2017 and TDC’s approach to Traveller applications.
Appendix 1 Neighbouring and Adjoining Local Planning Authority Plan Making Position April 2019
# Neighbouring and Adjoining Local Planning Authority Plan Making Position April 2019

**Note:** Based on best information available / TDC interpretation

<table>
<thead>
<tr>
<th>LPA</th>
<th>Adopted LP</th>
<th>Current / Emerging LP Position</th>
<th>Latest demog. OAN based on 10 years from 2019 dpa 2016 projection based (2014 comparator)</th>
<th>Latest OAN including market signals additions dpa (MS addition = %)</th>
<th>Adopted plan requirement dpa (total)</th>
<th>Emerging plan provision dpa (total)</th>
<th>Standard Method need calculation – unadjusted for plans 2019</th>
<th>2018 HDT position</th>
<th>SCG for LP Y/N (state in place / draft)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TDC (comparator figures)</strong></td>
<td>Core Strategy 2008. Adopted 10.08 Period 2006-26 = 20 years</td>
<td>Draft Our Local Plan 2013 Period 2013-33= 20yrs Submission / Examination commenced January 2019</td>
<td>331 (463) For emerging LP period = 332 (470)</td>
<td>398 (7960) (MS addition = +20%)</td>
<td>125 (2,500) Based on RSS</td>
<td>303 (6060)</td>
<td>648</td>
<td>65% = Buffer / Action Plan</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Reigate &amp; Banstead (Surrey)</strong></td>
<td>Core Strategy 2014. Adopted 07.14 Period 2012-27=15 years</td>
<td>Development Management Plan underway Formal five year review decision not to review Core Strategy</td>
<td>540 (820)</td>
<td>600 – 640 (9000 – 9600) (MS addition = +0%) (Max figure – but ranged – based on 2011 census)</td>
<td>640 (9,600)</td>
<td>NA</td>
<td>1148</td>
<td>119% No action required</td>
<td>Y</td>
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<tr>
<td><strong>Sevenoaks (Kent)</strong></td>
<td>Core Strategy Development Plan. Draft Local Plan at Examination</td>
<td></td>
<td>365 (505)</td>
<td>698 (13960) Standard method based</td>
<td>165 (3,300) Based on RSS</td>
<td>525 (10,500)</td>
<td>707</td>
<td>94% Action Plan</td>
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**Document Reference:** TED04

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<th>Area</th>
<th>Plan/Strategy</th>
<th>Adopted Date</th>
<th>Period</th>
<th>Baseline</th>
<th>New Plan</th>
<th>Note</th>
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<tr>
<td>Crawley (West Sussex)</td>
<td>Crawley 2030 - Borough Local Plan Adopted 12.15</td>
<td>02.11</td>
<td>2006-26/27 = 20 years</td>
<td>626 (714)</td>
<td>848 (879)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Local Plan Review Draft at Reg 18 stage</td>
<td></td>
<td></td>
<td>Baseline</td>
<td>950 (14,250)</td>
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<tr>
<td></td>
<td>Period 2015-30 = 15 years</td>
<td></td>
<td></td>
<td></td>
<td>No overt MS addition – used inclusive standard</td>
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<tr>
<td></td>
<td>Period 2020-2035 = 15 yrs</td>
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<td>964 (16,390)</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>(increased by + 88 for unmet need ‘principally Crawley’)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Note stepped requirement 876 first 5 years / 1090 remaining 7 years</td>
<td></td>
</tr>
</tbody>
</table>

| Mid Sussex (West Sussex)    | MS District Plan. Adopted 03.18                    |               |        | 752 (+32% MS) | 340 (5,100) |      |
|                             | Allocations plan in preparation                    |               |        |          | (Suggested CBC unmet need of 333 - 5,000) |      |
|                             |                                                    |               |        |          | 320 (4806) |      |
|                             |                                                    |               |        |          | (Suggested CBC unmet need of 431 – 6,475) |      |
|                             |                                                    |               |        |          | 797 |      |
|                             |                                                    |               |        |          | 181% No action required |      |
| Wealden (East Sussex)       | Core Strategy Local Plan Adopted 02.13             |               |        | 320 (570) | 340 (5,100) |      |
|                             | New Plan at Examination 2019; Local Plan           |               |        |          | (Suggested CBC unmet need of 333 - 5,000) |      |
|                             | Period 2013-28 = 15 yrs                            |               |        |          | 320 (4806) |      |
|                             |                                                    |               |        |          | (Suggested CBC unmet need of 431 – 6,475) |      |
|                             |                                                    |               |        |          | 797 |      |
|                             |                                                    |               |        |          | 110% No action required |      |

Document Reference: TED04
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<table>
<thead>
<tr>
<th>Local Plan</th>
<th>Partial Review</th>
<th>method comparator</th>
<th>2014 projection based = 2,207 (44,140)</th>
<th>1,645 (32,900)</th>
<th>NA</th>
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<th>151% No action required</th>
<th>Y</th>
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<tbody>
<tr>
<td>Croydon (London Borough)</td>
<td>Croydon Local Plan Partial Review</td>
<td>NA</td>
<td>2016-2036 = 20 years</td>
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<tr>
<td>Bromley (London Borough)</td>
<td>Bromley Local Plan</td>
<td>NA</td>
<td>SHMA for South-East London = 1,320 (13,200) GLA = 1,840 (short term) and 1,530 (long term)</td>
<td>700 (7000)</td>
<td>NA</td>
<td>NA</td>
<td>110% No action required</td>
<td>Y</td>
</tr>
</tbody>
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Appendix 2 Comparative Dwelling Yield Assumptions (Allocated LP Sites)
## Plan Housing Allocations - Potential Alternative Trajectory Assumptions

<table>
<thead>
<tr>
<th>Policy Reference</th>
<th>Site</th>
<th>Settlement Tier</th>
<th>Source (Land Supply)</th>
<th>Site Area From Plan (Gross Ha)</th>
<th>Site Area Net at 80%</th>
<th>Site Capacity From Plan</th>
<th>High Net Area Maximum Yield 50 dph</th>
<th>Standard Assumptions Site Area Net Ha at 80%</th>
<th>Standard Assumptions Site Area Net Ha at 60%</th>
<th>Standard Assumptions Site Area Net Ha at 40 dph</th>
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**Document Reference: TED04**

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Conclusions:

1) Average net density on Plan assumptions =

1191/40 Ha = 30dph

2) Based on 40dph on 60 % developable area assessed additional capacity is:

\[ \begin{align*}
\text{Plan assumptions} &= 60\% \\
\text{developable area assessed} &= 1648 \\
\text{PLUS} &= 457
\end{align*} \]