Dear Chris,

Please forward the below on to the Planning Inspector.

Many thanks

Marie

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Dear Inspector,

Further to your letter dated 28 April 2020 (Ref ID12), please see below our initial thoughts on how we intend to respond to the questions you have raised.

The plan submitted to you in January 2019 was prepared and tested against a robust evidence base which is before you. As part of the evidence base, extensive transport modelling and viability assessments were carried out to inform the plan, including the Garden Community proposed for allocation at South Godstone. As set out in that evidence, and in particular our Hearing Statement Matter 6 South Godstone Garden Community and housing allocations (TED10) and Note for the Inspector- HIF and SGGC (TED24) the plan and proposals within it were all found to be viable and did not rely on the receipt of Housing Infrastructure Funds (HIF) in order to secure delivery. Success in the HIF application was to create greater viability ‘headroom’ for affordable housing and kick start development with investment at Junction 6 and Felbridge junction, but this position was never assumed for the Local Plan.

As such, the lack of HIF does not alter the outcomes and deliverability of the plan. Whilst the Council continue to feel that the scheme presented to government for HIF funding was robust and should have attracted the funding, the submitted plan is unchanged.

Whilst the Council fully recognise the extraordinary times we are all operating in the information which you are considering continues to represent our best understanding.

We have identified that the main issues you are seeking a response to below and we have set out our initial thinking, and the steps we are taking, in turn:

1. Clarification regarding the view of Highways England that mitigation is required at Junction 6 of the M25 by 2024/25, unless a later date is justified and whether this strategic infrastructure is considered necessary prior to any delivery of dwellings at the proposed South Godstone Garden Community (Policy SGC01).

It is maintained that junction mitigation is necessary prior to the occupation of dwellings within the Garden Community and that phasing would play a key role in ensuring that junction improvements could be delivered. However, now the outcome of HIF is known, the Council will liaise with Highways England to clarify their view on this matter, and then if necessary, undertake any further viability work to ensure that changes to assumptions in INF2 are reflected.
2. Implications for the delivery of the housing supply as proposed in the Local Plan including the proposed South Godstone Garden Community and for the soundness of the Plan. In particular implications of the HIF bid decision for the deliverability and developability of the proposed housing supply and for the housing trajectory.

The outcome of HIF would not alter the phasing to the development. TED24 sets out that development on site would commence in 2026 and therefore would not have a direct impact on Junction 6 until this time. TED 24 also explains how HIF had three main aims:

- create private sector development confidence by reducing early borrowing costs and financial risks
- accelerate the start of the project.
- create headroom for the costs of other aspirations in creating a high-quality Garden Community, with greater affordable housing provision.

The outcome of HIF does not change this. The Council will clarify with Homes England the timeframe for Junction 6 delivery and then if necessary, remodel viability. Although, TED24 and INF2 explain that the Garden Community would still be viable without HIF and junction 6 and Felbridge junction improvements could be paid via developer contributions/private investment. Nevertheless, the Council are also in contact with Homes England and MHCLG to discuss other funding options that are available, such as the Single Housing Infrastructure Fund.

3. Ascertain what is the level of development which may take place in advance of the necessary strategic infrastructure works which were to be funded through the HIF bid and delivered by 2024/25? And confirm your position through a statement of common ground with Surrey County Council as Highways Authority and Highways England.

The Council maintain that the lack of HIF will not prevent housing delivery, nor the delivery of the Garden Community. However, we have already contacted the relevant parties and are awaiting a response from them so that we can secure an updated Statement of Common Ground as requested. It is not clear how long it will take to secure this and as such we cannot presently provide you with a firm date. We have included more on timelines for returning the information to you, below.

4. How, in the absence of HIF funding, any necessary strategic infrastructure would be secured and consider any implications for the viability of the proposals in the Plan, given that the HIF process has refined the infrastructure costs from those assumed in the viability assessment for the Plan.

The Council are in contact with Homes England and MHCLG to discuss other funding options that are available to the Council as they were not opposed to the principle of the South Godstone Garden Community. As set out above, following dialogue with other parties, such as Highways England, if necessary, the Council will remodel the viability assessment.

5. The difference between different transport evidence and what bearing does the conclusion reached in MHCLG letter have in relation to soundness?

As was discussed at the examination, there were a number of pieces of work and evidence that were carried out to inform the HIF bid, but which were not publicly available. In addition, different parameters and criteria for the HIF were set in comparison to the Local Plan and they cannot be
considered ‘like for like’. The Council, despite its best efforts, were not permitted to provide our transport assessment (which was made available to the examination into the Local Plan) as part of the HIF bid. The Council consider that this has resulted in an inaccurate statement made by MHCLG concerning the impact on local roads. This part of the MHCLG letter also lacks specifics. We have been endeavouring to gain access to the HIF teams at CLG to discuss our bid and the outcome further, however, this has not yet taken place. In addition, MHCLG were not applying the local plan tests of soundness to the HIF bid. As such, we do not feel that this raises any issue of soundness, more that the HIF was very specific about what it would consider and what it would not, leading them to their published conclusion. Nor should their observation in relation to local traffic issues be persuasive in the context of the local plan examination in the different evidence bases and tests.

6. Finally, please provide your realistic estimate as to when the Council will be able to respond to my questions given the present circumstances (COVID)

Once we can update you further in terms of timescales, we shall write to you again. As I am sure you will understand, some of the action points are issues over which unfortunately we cannot control the timing. In the meantime, we will publish your letter (ID12) on the Council’s website as requested. Further, as you can imagine the Council are eager to receive your post-hearing feedback and once you have had chance to consider our full and formal response to the above, we would like to receive your correspondence as soon as practicable thereafter.

We hope this is of assistance and we will be in touch. In the meantime, please let us know if there is anything else the Inspector needs.

Best wishes

Marie

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www.tandridge.gov.uk

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general election 12 december 2019
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