Document TED17, with its table showing “possible revised capacities” for sites allocated for housing in the Tandridge District Council's (TDC) Local Plan represents a slight improvement, but is a long way from correcting a position that runs directly counter to national policy and is therefore, surely, unsound.

As TDC admits on page 47 of its Hearing Statement on Matter 2 (TED04), the yields given for the sites in the local plan assume a “very low” average density. This is in defiance of Government policy as expressed, for example, in paragraph 1.53 of the White Paper *Fixing Our Broken Housing Market* which makes clear that plans should “avoid building homes at low densities”, and in the subsequently revised NPPF, not least at paragraph 137.

TED17 merely suggests adding the word “minimum” to these “deliberately cautious” yield estimates, while otherwise leaving them unchanged. This clearly does almost nothing to bring the Plan into line with Government policy and thus to make it sound.

The “possible revised capacities” (in itself a very tentative description) amount to a total uplift of almost 40% (459 dwellings) on the yield estimates which TDC originally proposed, and to which it still adheres: on some individual sites they almost double the number of homes. That, in itself, confirms that the Local Plan is a long way from confirming to the requirements in the new NPPF that densities should be “optimised” and “promote a significant uplift in minimum density standards...”.

I am not qualified to judge whether these “possible revised capacities” represent optimised densities. I would, however, think it unlikely given TDC’s expressed position on the subject. And there is, of course, no commitment whatsoever to achieving even them.

If the plan is to be made sound it must surely explicitly contain a clear commitment to optimising densities and promoting a significant uplift as required by paragraph 137 of the new NPPF. (These objectives, I understand, are plainly relevant, even though the plan is being examined under the transitional arrangements).

Instead, as I have previously pointed out, TDC explicitly removed all references to optimised or optimum densities from policy TLP19 for the final “version for submission” of the local plan. It also removed an undertaking to refuse to approve schemes “lower than the average density for the surrounding area” in clear contradiction of the requirement for “significant uplift”.

Those changes were made with full knowledge – and in deliberate defiance – of Government policy as laid down in the White Paper and the NPPF, as the statement at the time by TDC’s then Director of Place (which I quoted in my Reg 19 submission and hearing statement) makes absolutely clear.

Quite apart from their effect on the soundness of the plan, these changes – and the resulting Policy TLP19 – make it impossible to meet the requirements of paragraph 137 for demonstrating the existence of the exceptional circumstances needed to justify any alteration of Green Belt boundaries in the district.

Meanwhile, TDCs “possible revised capacities” confirm even more strongly that there is no need for the unviable and unsustainable proposed garden community at South Godstone. Achieving them would obviate the need to build a third of the 1,400 homes TDC proposes for the garden community during the plan period. In fact this number was shown at the examination to be very optimistic: under a more realistic expectation, achieving the capacities would deliver well over half the housing likely to be provided.

Any shortfall would easily be made up by allocating more sites in the Tier 1 and Tier 2 settlements that TDC admits to be the most sustainable locations, but which are often almost entirely neglected in the local plan. It is both notable and unjustifiable, for example, that the top three settlements in the district's hierarchy – Oxted, Whyteleafe and Caterham Valley – have been allocated only 12 homes during the remainder of the plan period.