Dear Sir

TANRIDGE DISTRICT COUNCIL LOCAL PLAN EXAMINATION 2019
INSPECTOR LED POST HEARING CONSULTATION ON TDC DOCUMENT – TED17 HOUSING YIELDS OCTOBER 2019

1.1 I write on behalf of Woolbro Homes, in respect of their interest in “Land at The Old Cottage, Station Road, Lingfield” (“the site”). This Letter provides brief comments on the submitted document TED17 – Housing Site Yields – October 2019 and how this affects the site.

1.2 The site at “land at the Old Cottage” comprises a Site Allocation (HSG12) within the Submission Draft Local Plan (Reg.19) which is proposed for release from the Green Belt.

1.3 In considering these representations, consideration should be given to the documents which ROK Planning have submitted previously as part of the Examination in Public. These documents include:

- Matters 2, 3, 4 and 6 Hearing Statement including Appendices:
  - Heritage Statement completed by Bidwells (Appendix A)
  - Landscape & Green Belt Appraisal completed by LDA Design (Appendix B)
  - Alternative Lingfield Sites Assessment completed by LDA Design (Appendix C)
- Matter 8 Hearing Statement
- Letter to LPA following submission during Examination – Day 2, 09 October 2019

1.4 Given the comprehensive suite of evidence already submitted, it is not necessary to reiterate justification that the site can comfortably accommodate more units than the 60 as is currently set out on Page 96 of the Local Plan 2033 in the ‘Summary Table of Housing Allocations’ and draft allocation HSG12. It is considered that this has been clearly established through the representations which have been made previously. These representations include the written representation noted above as well as the oral submission made during the EIP Hearing Sessions.

1.5 In the context of the above, we wish to raise our concern and objection to the Council’s suggested changes to the LP as set out in the TED17 Allocated Housing Site Yields document. For clarity the Council’s suggestions are set out below:

a) Summary table wording is changed to: ‘Minimum Number of Units’
b) HSG01-20 Policies series – heading wording to be change to: ‘Use / Minimum Site Yield’

1.6 Specifically, it is our submission that the Council’s suggestion is not adequate to ensure that the site delivers a provision of housing which is in accordance with its actual capacity, i.e. to optimise housing delivery in accordance with national guidance. HSG12’s contribution to housing delivery can be optimised (whilst complying fully with the development plan) and as is demonstrated within the ‘Plan Housing Allocations – Potential Alternative Trajectory Yield Assumptions’ at 151 units. This material increase of 91 units from the 60-unit illustrative capacity set out in the Submission Local Plan will seek
to redress the identified undersupply in housing need.

1.7 If the Council’s suggestion was implemented and HSG12 was then to obtain planning permission for 61 units as an example (above the minimum of 60 units), this would represent substantial under delivery against the site’s capacity and would therefore not maximise housing in a highly constrained District.

1.8 The draft LP does not dictate site capacity reference as a policy requirement however, the reference to the cautious yield figure is unnecessary and prejudices the site potential to meet identified housing need.

1.9 Therefore, whilst the Council’s view in response to the Letter to Council dated 17/10/19 from ROK Planning regarding Housing Allocation HSG12 is noted and respected, it remains the case that the LPA are substantially underdelivering against identified OAN and through the suggested use of ‘minimum’ are potentially limiting the delivery of housing further. Therefore, the Council should implement all possible measures to ensure that as much housing delivery is maximised over the plan period to get as close as possible to meeting OAN.

1.10 In addition, it is noted that TED 17 references other allocated sites as a potential increased revised capacity. Such an increase should be consistent across the allocated sites and should be pursued fully in order to get as close as possible to meeting OAN. This would reduce pressure to identify further additional sites on Green Belt land. For example, taking the possible revised capacity based on site assessment increase for each of the sites would cumulatively deliver 459 additional dwellings (increase from 1,191 to 1,650 units), to contribute towards meeting the shortfall between the LP planned housing figure of 6,056 dwellings over the plan period and the current OAN of 9,400 dwellings.

1.11 It is therefore necessary to increase the yield assumptions within each site allocation in order to optimise housing delivery in the context of the identified OAN. In addition to this, the use of ‘minimum’ as per the Council’s suggestion, may prejudice delivery of the LP housing target within the plan period, thus undermining the soundness of the plan. It is considered that the use of ‘minimum’ is not sufficiently clear at subsequent planning application determination stage and may give rise to unnecessary ambiguity. This would prejudice delivery of the housing allocations. Each allocation sufficiently references that housing delivery needs to be in accordance with site constraints and reference to relevant development management policy. It is therefore considered that the use of the possible revised capacities and in conjunction with reference to relevant development control policy will more appropriately address housing delivery for each site.

1.12 Pursuant to the above, it is our submission that the wording of the summary table (Page 96 Submission Draft Local Plan) should be altered to reflect the ‘Possible Revised Capacities (based on Site Assessment)’ as set out in the ‘Potential Alternative Trajectory Yield Assumptions’ table in TED17 (deleted text struck through/ new text underlined):

<table>
<thead>
<tr>
<th>Policy Ref.</th>
<th>Site Address</th>
<th>Parish</th>
<th>Number of Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>HSG12</td>
<td>Land at The Old Cottage, Station Road, Lingfield</td>
<td>Lingfield</td>
<td>60 151</td>
</tr>
</tbody>
</table>

1.13 For Policy HSG 12 this would read (deleted text struck through/ new text underlined): -

HSG12: Land at The Old Cottage, Station Road, Lingfield  Use / Estimated Maximum Site Yield: (C3) 60 151

1.14 As per the above, in the case of HSG12 the wording should be altered to ‘up to 151 units’ rather than a minimum of 60. This will help to increase housing supply in the District over the Local Plan period and deliver appropriate densities on sites.
1.15 We trust that the above is helpful in the context of the Inspector-led post hearing consultation on TDC document TED17. It would be appreciated if you could confirm receipt of this letter of representation. If you have any queries relating to the letter, please feel free to contact Ben Dakin (ben.dakin@rokplanning.co.uk) or myself.

Yours faithfully,

Alun Evans
Director

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