Town and Country Planning Act 1990 (As Amended)

Tandridge Local Plan Examination

Inspector Led Consultation in Relation to TED17

Representations on Behalf of:
Tandridge Housing Forum

09 January 2020

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Appendix 1 Updated Housing Trajectories to Reflect Council’s Proposed Increased Site Yields set out in Appendix 1 of TED17
1. **Instructions and Introduction**

1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by the Tandridge Housing Forum ("the Forum") to prepare a Representation in relation to the Inspector Led Consultation on TED17 – Housing Site Yields (October 2019) that was submitted by the Council during the course of the recent Examination Hearing Sessions in relation to the soundness of the Tandridge Local Plan: 2033 Regulation 22 submission version ("the Plan").

1.2 This Statement sets out a brief Representation on behalf of the Forum and should be read alongside the previously submitted Forum Matters Statements and the verbal evidence presented during the course of the Examination Hearing sessions.

2. **Representations in Relation to TED17**

2.1 During the course of the Examination Hearing sessions the Council prepared an update on the projected yield from Tier 1 and Tier 2 settlements, which is set out in Appendix 1 to TED17. That document seeks to revise upwards the yield anticipated from a number of the proposed housing allocations, however, the document does not then set those yields within the housing trajectory for the Plan.

2.2 It is not therefore possible to ascertain from a review of TED17 how the Council envisages the increased site yield estimates will impact on the delivery trajectory across the Plan period.

2.3 In order to assist the Inspector Neame Sutton has applied the revised yields to the Council's housing trajectory (as set out in TED05) using the site specific trajectories the Council has previously published in HNS2.

2.4 The updated trajectories attached at Appendix 1 of this document show the impact of the increased site yield estimates on the Council’s trajectory.

2.5 As the Inspector will note from the trajectories that detail the Forum’s position on the Council’s supply sources (tables 3b, 4b, and 5b) it is clear that the increased site yields make no material difference to the Council’s position. In other words, the Council’s position is not improved, and it remains in a negative 5-year housing land supply position throughout the Plan period.
2.6 When examining the Council’s position (tables 1b and 2b) the uplift to supply created by the increased site yields does not materially address the housing land supply situation, for the following reasons:

1. The uplift equates to only 459 dwellings or 6.7% of the total supply (6,841 dwellings); and,

2. The majority of the changes made to the Council’s site yields relate to sites that are programmed for delivery in the later years of the Plan period (see Appendices 2 and 3 of HNS2). As a consequence the majority of the increased delivery will occur in the last 5 years of the Plan period. This demonstrates that the Council has not given proper consideration to the impact of the changes it suggests could be made to the site yields, which in the Forum’s view is an unsound approach.

2.7 On this basis it has not been necessary to interrogate the provenance behind the proposed increased site yields any further. It is however important to note that simply because the Forum has not interrogated the Council’s provenance does not imply an acceptance, on the part of the Forum, to the increases the Council suggests could be achieved from the various Tier 1 and Tier 2 allocations.

3. **Conclusion**

3.1 In conclusion on this matter the evidence that the Forum has previously presented in relation to Matter 2 both in its Matter Statement and verbally at the Examination Hearing session remains unaffected by the content of TED17. The Council still has a significant deficiency within its proposed housing delivery trajectory such that the Plan will fail to demonstrate a rolling 5-year supply of deliverable housing sites across the whole of the Plan period.

3.2 The solution to this problem remains as set out previously by the Forum, that further site allocations are required to address the significant shortfall in provision.