Knightwood Developments Ltd Representations reference ID: 1185198

Tandridge DC Local Plan - Inspector Led Post Hearing Consultation on
TDC Document TED17 Housing Yields October 2019

13th December 2019

1. Introduction

1. This statement submitted by Impact Planning Services Limited on behalf of Knightwood Developments Ltd, responds to the above consultation. It develops the case made at the submission plan (Regulation 19) stage and at the hearing sessions held by the Inspector on this matter and issue. The representation reference is 1185198.

2. Statement

The housing site yields

2. The TDC document TED17 refers to the concerns raised during the hearings about the interpretation of the numbers of dwellings set out for each of the housing sites proposed.

3. The TDC proposal is to introduce the word ‘minimum’ before the number quoted in the relevant policies. Whilst this Modification is accepted it does not address the real concerns about the quantity of housing required in the Tandridge District.

4. In the document TED17 the TDC continue to state that under the heading ‘Background issues’ in point iv) the detail of trajectory assumptions should not be a subject for detailed decision though the Local Plan Examination. This is a matter for the Inspector to decide. The TED 17 document continues to identify the more general matters which the TDC consider to be the subject of Main Modifications and of the three examples listed the first point about whether the balance between development and respect for constraints is sound, we say no. The balance between development and the respect for constraints is too biased in favour of the constraint of the green belt.

5. The exceptional circumstances for a more comprehensive and extensive review of the green belt remains. This is because the full housing need set out in the Objectively Assessed Need (OAN) and sufficient land to accommodate this need, must be provided in this Plan.

6. The second point is should the housing requirement be altered up or down? We say it should be increased for the reasons set out in our previous statements.

7. In the third point which refers to the ‘lack of exceptional circumstances for a potential excessive release’, there is no suggestion that the Plan needs to make an ‘excessive release’ of the Green Belt. The quantity of Green Belt that needs to be released is that amount of
land necessary to meet the full OAN. In addition, land should be identified as ‘safeguarded land’ as set out in our hearing statement on Matter 4 Green Belt Boundary Alterations. This is not excessive.

8. It is the HELAA, which TDC refer to for the justification of the housing yield figures and that document includes ‘Statements of Delivery’. These are statements made by the landowners or their agents and they are consistently recognised as being over optimistic in terms of the number of homes anticipated and more significantly in the timing of the development. Therefore, the use of such evidence must be qualified as highly dubious as explained above. This leads neatly into the next point.

9. Appendix 2 of the TD17 contains an undated letter from ROK Planning referring to the Examination Day 2 on 9th October 2019. Whilst this letter argues for an increase in the number of dwellings for a site in Lingfield, TDC respond to say they do not agree with making this increase. The key in all of this is the need for accurate monitoring of housing planning permissions and completions. This must be carried out annually and it will allow TDC to assess whether their minimum guidelines on housing numbers as proposed in the Modification are reliable or not.

10. Should the guideline figures fail to be met across the District then TDC should carry out an urgent review of the land allocated for housing. This can be addressed with Safeguarded Land and in strategic allocations such as South Godstone, bringing later phases of the development forward much sooner and in additional land in the area such as Blindley Heath. It will enable the community to know where new housing is likely to be allocated later in the Plan period and after as required in the NPPF Green Belt policy at paragraphs 83 and 85 of the 2012 NPPF.

11. Should the monitoring process show that the guideline figures are being exceeded then the safeguarded land would remain to be treated as if it was still in the green belt and the phasing of the strategic site at South Godstone and any other large sites could be reviewed.