TAN DRIDGE DISTRICT COUNCIL ‘OUR LOCAL PLAN: 2033’
INSPECTOR LED POST HEARING CONSULTATION ON TDC DOCUMENT TED17
HOUSING YIELDS (OCTOBER 2019)

1.1 These comments are submitted by the Tandridge Lane Action Group (TLAG) in response to the invitation from the Inspector for the participants in Days 1 and 2 of the Local Plan examination hearings to respond to document TED17 Housing Yields October 2019 submitted by TDC.

Introduction

1.2 TLAG’s comments are made in the context of our Regulation 19 representations and responses to MIQs, which demonstrate that the proposed level of housing growth over the plan period could be accommodated without the need for the proposed South Godstone Garden Village. This could be achieved through a combination of (a) increasing densities on suitable proposed allocation sites (b) allocating more housing in Tier 1 and Tier 2 settlements and (c) making more realistic windfall allowances.

1.3 In TED17, TDC explicitly confirm that, in relation to (a) above, densities could be increased on proposed allocation sites. However, the proposed response by TDC, to simply confirm that the existing yield assumptions are ‘minimum’ figures, is wholly inadequate.

TLAG comments

1.4 TDC seek, in TED17, to provide justification for the yield assumptions on the proposed housing allocation sites in the Tier 1 and Tier 2 settlements. The combined totals of the proposed site allocations are included in draft Policy TLP01 Spatial Strategy, as 768 for Tier 1 and 533 for Tier 2 (a combined total of 1,301).

1.5 The table at Appendix 1 of TED17 includes the site yields assumed for each site allocation, excluding the yields from HSG4 and HSG10 (10 and 18 units respectively) as they are identified as already benefiting from permission, and the yield from HSG20 (82 units). The remaining cumulative total from other allocation sites is 1191 units across the Tier 1 and Tier 2 settlements.

1.6 TDC confirm, in TED17, that the yield estimates for the allocation sites are ‘deliberately cautious’ in order to provide flexibility in housing delivery. The highlighted column at Appendix 1 of TED 17 provides a ‘Possible Revised Capacity’. This results in a cumulative yield of 1,650 dwellings, which represents an uplift of 459 homes over and above the 1,191 cumulative yield for these sites in the draft plan. This is an uplift of nearly 40% (and TDC’s revised assumptions are still below the possible yields suggested by some promoters).

1.7 TLAG do not explicitly endorse the yields suggested by the promoters of the allocation sites, nor have we undertaken our own site-specific analysis. We also do not support higher densities where we fundamentally disagree with the allocation of a site at all, such as the ‘Star Fields’ site in Lingfield, where a more suitable site can deliver more housing in any event. However, the very fact that TDC have produced revised yield estimates which in some cases double (or even almost triple) the yields included in the draft plan,
demonstrates the inadequacies of the original assessment and highlights the failure of TDC to optimise densities on sites in the most sustainable locations, as well as failing to allocate sites in the right places.

1.8 TDC suggest, in TED17, that it is not necessary to change the estimated yields because they represent ‘suitably cautious’ assumptions and that by adding the word ‘minimum’ they are clarifying that the estimated site yields are not intended to represent policy targets or ‘caps’ on the number of units that an allocated site can deliver.

1.9 There is, however, no clear rationale for this very cautious approach. It is not reflective of the national policy imperative to optimise densities in sustainable locations - even though the plan is being examined under the old NPPF there can be no question that the objectives of paragraph 137 of the new NPPF are not highly relevant and applicable in this instance, particularly when removing land from the Green Belt elsewhere in the district is proposed. Nor is it consistent with TDC’s own draft policy TLP19, which requires all development to make the most efficient use of land.

1.10 Simply clarifying that the cautious estimated yields are minimum figures does not therefore go far enough. Furthermore, TDC has, as we have pointed out previously, deliberately and unjustifiably excluded optimising densities from its draft policy THP19, in defiance of national policy. Even then, its approach is not consistent with the draft policy’s remaining requirement for all development to make the most efficient use of land. The estimated yields should be based on accurate assessments which reflect the need to optimise density and seek to make the best use of land on all suitable sites.

1.11 This is fundamentally important given that these estimated yields have been used by TDC to inform the overall Spatial Strategy in TLP01. When combined with additional allocations in Tier 1 and Tier 2 settlements (the Inspector is aware, for example, that TDC have not proposed a single housing allocation in Oxted throughout the plan period and very few in Caterham, the largest urban area in the district), increasing densities on the proposed allocation sites would allow delivery of the same level of housing growth over the plan period without the need for the proposed highly unsustainable Green Belt release at South Godstone.

**Recommendation**

1.12 TLAG’s recommendation in relation to TED17 is that the revised site yields, rather than the original figures, should be adopted as a starting point by TDC, and that it should proceed from there to optimising densities on all allocated sites so as to conform to national policy. This should then be reflected in the overall Spatial Strategy at TLP01. This would not in itself resolve TLAG’s objection to the plan as drafted though if combined with a revised approach to the spatial strategy, which promotes more housing in sustainable locations (especially in the North and West of the district), the allocation at South Godstone would not be necessary to meet the total housing delivery target (notwithstanding that it is an entirely unsuitable location for a garden community in any event).

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1 Para 137 of the new NPPF states the following:

137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.