

Suggested response to Tandridge District Council's Draft Local Plan consultation July 2018

The London Borough of Bromley welcomes the opportunity to comment on Tandridge District Council's Draft Local Plan. We note that this a consultation under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 and therefore representations made will be submitted alongside the Draft Local Plan for consideration by an appointed Inspector at examination.

The London Borough of Bromley is committed to engaging positively with its neighbours not only to satisfy the requirements of the "Duty to Cooperate" but also to ensure that any potential adverse impacts on its own communities are highlighted and investigated. We support the broad objectives of the Draft Local Plan and recognise the constraints which influence how the District may be able meet its objectively assessed needs for development, however we wish to raise some concerns.

Housing supply

Bromley notes that Tandridge intend to submit their Draft Local Plan for examination before the end of 2018 and therefore it should be examined with reference to the 2012 NPPF rather than the 2018 revision. It is for this reason that it is staying with the Objectively Assessed Need (OAN) of 9,400 from 2015 rather than the higher figure produced by the Government's recently introduced new methodology.

Tandridge acknowledges that its strategy for housing supply does not meet the OAN and considers that the approach is justified by the NPPF para 14. Whilst Bromley recognises the significant constraints posed by a District with 94% Green Belt, it encourages Tandridge to try and meet its OAN within its boundaries to avoid increasing pressure in neighbouring areas notably London, which is a single housing market area. Bromley would be unable to help accommodate any unmet housing need due to its own constraints and as part of the London housing market area, Sevenoaks will also need to engage with the Mayor of London in order to discuss meeting any unmet need in the future.

Gypsies and Travellers

The Draft Local Plan states that Tandridge's Gypsy and Traveller Accommodation Assessment (GTAA 2017) identifies a need for five additional pitches for Gypsies and Travellers between 2016 and 2033. However, we note that the District does not propose to allocate any sites for travellers in the Draft Local Plan, rather wishing to adopt a criteria based policy for granting planning permission when proposals arise during the plan period. The policy suggests that an acceptable location would be "within or adjacent to the settlement boundary of an urban or semi-rural service settlement" or as part of the comprehensive master planning of the South Godstone Garden Community".

Whilst a small need for traveller sites in the first five years of the plan is acknowledged, it seems that there has not been adequate consideration of future

APPENDIX 3

needs, for example, those likely to emanate from household formation as the children of existing traveller families grow up. The PPTS specifies that traveller sites are inappropriate development in the Green Belt, therefore, despite the policy suggesting where travellers might be best located, any proposal which arises in the Green Belt will still need to demonstrate very special circumstances. Whilst the identification of South Godstone Garden Community as a possible area is welcomed, this is not reflected in the actual policy for South Godstone and, in any case, the delivery of that policy is dependent on a forthcoming Area Action Plan. There are concerns that this failure to plan for adequate numbers and to secure sites and plots in the Local Plan may lead to unauthorised encampments in the District and adjacent boroughs, including Bromley. It is recommended the Draft Local Plan addresses the need for the whole plan period, and that, in the absence of other specific allocation for traveller pitches, the Policy for South Godstone Garden Community is amended to include traveller site provision.

Bromley would like to see Modifications made to the Tandridge Draft Local Plan to take into account its concerns in order to ensure that the plan is sound and that potential adverse impacts on Bromley are minimised. We look forward to continuing our cooperation on cross-boundary matters in the future.