

## **Statement of Common Ground**

between

Caterham, Chaldon & Whyteleafe Neighbourhood Plan Steering Group

and

Tandridge District Council

regarding

the Examination of the Caterham, Chaldon & Whyteleafe  
Neighbourhood Plan – Housing Development

agreed February 2020

## Introduction

This Statement of Common Ground has been developed at the request of the Examiner of the CCW Neighbourhood Plan, Mr. Jeremy Edge, and its main subject is the housing figures set out in the Plan as submitted, particularly Table 5.2.

The Examiner requested that the Table be updated to the end of December 2019 and outlined a number of points he wished to see clarified. More recently he has issued an agenda and notes for the Hearing on 10<sup>th</sup> March 2020 which pose additional questions. This SOCG sets out agreed notes to the updated table, and answers to a number of questions posed by the Examiner in his agenda paper.

An updated and agreed spreadsheet version of Table 5.2, labelled Housing Site Availability in the Plan Area 2015-2033, is attached to this SOCG. The presentation has been amended from that in the Plan to provide additional information on relevant planning applications, and clearer information on delivery status, numbers of units and to better identify sources of information. It has also been retitled “**Housing Site Availability in the Plan Area 2015-2033**” in order to more accurately reflect its content as it does not solely cover brownfield sites.

Draft iterations of this Table have been checked by TDC and by CCW, and any discrepancies remaining are considered by both parties to be negligible in terms of their impact on the overall figures.

## Sources of Data

The original source of the information summarised in Table 5.2 of the Neighbourhood Plan derived from a number of sources. It was compiled by the NP Housing Subgroup from TDC Planning Applications and Monitoring Records. Including: sites contained in the adopted local plan, the emerging local plan, the Caterham Masterplan, sites submitted by “call for sites” exercises and ongoing monitoring of planning permissions granted. As the preparation for the Neighbourhood Plan progressed, the data was checked and monitored to ensure that no double counting was occurring, e.g. the same site appearing under two or more categories and sometimes with differing housing capacities.

The compilation of the data has led to the preparation of Table 5.2, but it was recognised that at each key stage in the Plan's preparation it needed to be re-checked and updated, as indeed has been the case during this Examination.

There is no separate CCW Neighbourhood Plan evidence base document, underpinning Table 5.2, because of the fact that the data is not 'fixed', and would quickly become out of date. However, as set out above and in the following paragraph, it is underpinned by TDC data. TDC and CCW now agree that the latest iteration of Table 5.2 represents the most comprehensive database of large sites with residential planning permission, residential allocations and potential allocations in the Plan area.

Table 5.2 has therefore now been updated by the CCW SG and checked by TDC using the Council's housing monitoring database. Several iterations of the spreadsheet have been checked by both parties to arrive at the final version attached. The sources of information used in the most recent updating have been: published TDC Annual Monitoring Reports, material produced in connection with the recent Local Plan examination in public, the live TDC database (which includes information on developer intentions), and local knowledge, for example the records of the four local parish planning committees which comprise the CCW NP area. It should be further noted that Completions are monitored several times a year by TDC and checked on site.

The spreadsheet comprising Table 5.2 now includes several small corrections to the original table, and updates it to reflect new large permissions, onsite activity and developer anticipated delivery dates, to the end of December 2019.

In addition, it has been considered appropriate to create greater clarity around windfall sites (1-4 units). The original table contained an estimate of windfall additions of 5% and was based on figures provided by TDC. However, with the passage of time, it has not proved possible to identify and update the source of this estimate. However, TDC have area-specific monitoring information for small windfall sites delivering four or fewer residential units and by working with the CCW, the former estimate has now been replaced by these figures so that the windfall contribution to housing delivery in the area over the last few years can now be identified.

### **Explanatory Notes to the Table and Update**

Both Table 5.2 and the attached agreed spreadsheet refer to large sites i.e. of five or more residential units in the CCW NP area, either permitted since 2015 or allocated in the emerging Local Plan.

The housing data was compiled into a spreadsheet which has now become Table 5.2 in the various versions of the Draft Plan. Following comments made by TDC in mid-2018 on an earlier and much lengthier version of the Draft Plan, a significant amount of supplementary housing data was removed from the Plan, but Table 5.2 is felt to have great value and has been retained in the Plan and updated at all key stages.

Sites may be wholly residential or mixed development. While the table is headed "Brownfield Sites" and the vast majority of sites included are brownfield as defined in the NPPF, a small number (identified by an asterisk) are greenfield or a mix of brown and greenfield. Given this, the CCW SG has taken the decision to rename Table 5.2 to assist in the examination process.

In all cases figures given are net additions to the housing stock:

- “Completed” means completed net additions to the housing stock.
- “Under construction” means sites that were under construction at the end of 2019. In some cases, construction work will not yet have delivered completed units.

In lines 9-14 of the spreadsheet six additional permissions given between the date of compilation of Table 5.2 and the end of 2019 have been added. One of these, in line 12, is on part of a site allocated in the emerging Local Plan (see line 67).

An early comment from the Examiner asked when the development of 167 units at Godstone Road, Whyteleafe was expected to be completed. As at December 2019 information from TDC is that the owner has indicated a start of heavy ground works in April 2020 and suggests completion by the end 2020 or early 2021, which is more likely given the size of the development.

Spreadsheet lines 33, 34 and 35 give updated details of three sites which in Table 5.2 were marked as a block of “Not started” sites with estimated completion dates in the past, and this was queried by the Examiner. This category heading has now been removed and the three sites added to the overall list (Gadoline House which is now completed, Tillingdown Farm which is under construction, and the balance of Marie Curie).

Spreadsheet lines 38-49 sets out a block of sites labelled “Revisions since Housing Sub Group Report”, also so labelled in Table 5.2.

The Examiner queried whether it was anticipated that these sites would be delivered by 2025. The spreadsheet updated information shows that most of these sites are complete or under construction.

The Examiner asked about two specific sites:

- Quadrant House - Since Table 5.2 was produced in July 2018, Quadrant House has been bought by TDC who have elected not to take advantage of permitted development approval originally shown. TDC are intending that the building will be a business hub as opposed to residential, hence the figure is now shown as zero as no housing units will be delivered on the site.
- Westview Avenue - this was shown in an early iteration of the update of Table 5.2 in error, as a small site it has now been included in Windfall figures.

The Examiner asked if Rose and Young site has planning permission for 48 units. There is a net gain of 48 units for this site under application 2015/1926. There is an earlier approval 2014/15 for 68 flats and a later one 2018/138 for a hotel and

restaurant. Demolition and earthworks have taken place but work is currently halted due to Contractor's financial problems. TDC is working on basis of eventual implementation of 2015/1926 for net gain 48 units but this is unlikely to be before 2021/22.

Spreadsheet lines 56-61 specifically identify a number of new sites taken from the TDC Annual Monitoring Report for 2018, which were not included in Table 5.2.

Line 65 identifies a list of sites from "TDC Housing Topic Paper 2018". This paper set out a number of sites which were later included in the emerging Local Plan as Allocations, as denoted in the spreadsheet, as well as a number of sites included in the Caterham Masterplan.

### **Double Counting**

Line 12 2018/2445 and Line 67 CAT005/HSG08 156-180 Whyteleafe Rd. Planning permission for 39 units has been given for part of this site as indicated in the spreadsheet line 12, and a further application for 34 on the balance of the site is at appeal. This site is retained in the spreadsheet because it is an emerging Local Plan allocation, with a nominal capacity of 59. This site is therefore also included in the Table at line 67 with a figure of 20 to give the TDC estimate for the whole site. If the appeal application is successful the capacity of the site will be greater than 59, at 73. See notes on page 3 of spreadsheet.

The Examiner has in his agenda notes (para 10) requested that the issue of double counting in Table 5.2, raised by Rydon Homes and TDC, be addressed and this has been done.

To some extent the confusion arises from the title of Table 5.2 which is inaccurate as presented in the submission Neighbourhood Plan because, rather than setting out the contribution expected from brownfield sites, it additionally sets out the contribution from allocations in the emerging Local Plan and Caterham Masterplan, from other TDC policies such as One Public Estate, and from Windfalls (not defining whether these are on brownfield land or all land including garden land). It is therefore agreed that the total figure of 1348 at the foot of Table 5.2 in the Submission plan did not solely represent brownfield capacity in the Neighbourhood area. It is now hoped that, with the revisions and retitling of Table 5.2, this figure has now altered and there is now greater clarity regarding the content and purpose of the Table.

### **Inconsistency between paragraph 5.9 of the NP and Table 5.2**

The Examiner in his agenda notes has raised the point that paragraph 5.9 mentions 82 dwellings being delivered in the Neighbourhood area as part of the One Public Estate policy, while Table 5.2 suggests that 150 will be delivered, in two tranches of 70 and 80 units.

Paragraph 5.9 is correct, as numbers to be delivered from One Public Estate in the area are estimated at 82 units (as set out in the emerging Local Plan and in associated Examination document TED 05). TDC's current housing trajectory estimates that 32 will be delivered in 2027/8 and a further 50 in 2028/9. Line 74 of the spreadsheet has therefore been updated with this information.

### Windfall completions

Table 5.2 included an estimate of 5% for Windfalls - see the comment above regarding data sources, and the table below which sets out how many residential completions have come forward on small Windfall sites within the Neighbourhood Plan area since 2013/14. As garden land is not regarded as "brownfield" in the NPPF, the table gives overall totals and then splits these into garden land/non garden land. The majority of windfalls are derived from non-garden land. The table shows that, regardless of the definition of the original land use, windfall residential development has been delivered at a steady rate. This may be expected to continue and based on the average completion rate of 15 pa would add around another 200 completions over the Neighbourhood Plan period, to add to the 72 already shown in Table 5.2.

Year	Total CCW Small Site (4 units and under) Windfall Completions	Total CCW Small Site Windfall Completions on Residential Garden Land	Total CCW Small Site Windfall Completions Excluding Residential Garden Land
2013/2014	19	10	9
2014/2015	15	6	9
2015/2016	19	8	11
2016/2017	5	4	1
2017/2018	22	3	19
2018/2019	7	0	7
2019/2020 (up to end of Dec 2019)	19	3	16
<b>AVERAGE</b>	15	5	<b>10</b>

Agreed between CCW Steering Group and Tandridge District Council

(signed)

Name

For CCW Steering Group

(signed)

Name

For Tandridge District Council

Date