

TANDRIDGE LOCAL PLAN CONSULTATION – KEY POINTS

Listed below are some comments about the Council's Local Plan documents that may be helpful for taking part in the consultation. Please do send your views to Tandridge Council whether they are put in a short email/letter or in a more detailed response. The more residents who write in, the more chance there is of protecting the area from being swamped by overdevelopment and of achieving a reasonable and proportionate outcome that meets local need rather than allowing massive inward migration from London.

To submit comments either:

- 1. Email them to: localplan@tandridge.gov.uk OR**
- 2. Send a letter marked "Local Plan consultation" to: Planning Policy, Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey, RH8 0BT OR**
- 3. Use the Council's consultation "portal" on this link: <http://consult.tandridge.gov.uk/portal> Click on "Local Plan – Issues and Approaches." You will have to register first to be able to take part this way and it is more time-consuming.**

The deadline for comments is 26 February 2016

For information: The Council's new Local Plan sets the policy for future development in Tandridge District. Once it is agreed, all planning applications will be decided in accordance with it.

The Local Plan documents are on these links: <http://bit.ly/1YtPs7R> and <http://bit.ly/1Ysp0vg>

The first link has:

- 1. HOW MANY HOUSES:** See "*The Strategic Housing Market Assessment 2015: Tandridge's Objectively Assessed Housing Need Technical paper*" – known as the "SHMA", this claims 9,400 more houses are needed in the District, that is 470 every year, almost 4 times the number required under the current Local Plan. The vast majority would be on Green Belt land for massive and sustained inward migration from London.
- 2. WHERE THEY WILL GO:** "*HELAA Appendix 3*" - the sites that the Council has identified as "deliverable and developable" for new housing.
- 3. THE AREAS OF GREEN BELT UNDER THREAT:** "*Green Belt Assessment Appendix D*" - in these assessments, the Council has split all the Tandridge Green Belt into 47 parcels and made judgements about each one's value to the Green Belt. There are many errors and inconsistencies in the assessments, and this leads to some highly questionable conclusions.

See also "*Green Belt Assessment Appendix F*" which has a map of Green Belt areas the Council has identified for "further investigation." The conclusions regarding these areas should have been included in this consultation.

4. **INFRASTRUCTURE:** There are 4 documents listed. In particular, see the conclusions in the documents “*Infrastructure Baseline Study: Part 1*” and “*Infrastructure Delivery Plan Baseline Part 2.*” Comments below.

The second link has:

The Council’s “Issues and Approaches” document. Pages 32 and 33 show 7 options, called “delivery strategies.” **We have now taken legal and planning advice which has made very clear that none of the Delivery Strategies are considered to be sound because they are not justified, effective or consistent with national policy.**

Delivery Strategies 3-6 propose large amounts of building on the Green Belt as well as open spaces and recreation grounds and require the Green Belt boundaries to be changed. Option 2a would require building on open spaces, and 2b does this as well as relying on a blanket density of 70 dwellings per hectare with no regard either for local character which in many areas is much lower than 70 dwellings per hectare.

COMMENTS ON THE HOUSING NEED FIGURE

- The documents assert there is a "need" for the huge number of 9,400 new houses in Tandridge District – that means 470 new houses every year which is almost 4 times the current housing requirement. The Council’s own barrister submitted a large amount of evidence to the Planning Inspectorate in 2014 to demonstrate that such high figures are inflated , unreliable and contrary to the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). We believe that it is wrong for the Council to contradict itself in these Local Plan documents.
- The vast majority of these new houses would be built on Green Belt land for a massive and sustained increase in inward migration from London and not for genuine local need. The Council is not required to provide for large amounts of inward migration at the expense of the Green Belt.
- The need figure would mean a likely rise of a third in the District’s population with approximately one new house built for every four existing. This is unrealistic and unsustainable in a predominantly rural District such as Tandridge.
- The evidence documents contradict each other because one set shows that while Tandridge has seen loss of local employment since the mid-1990s, the local economy is now stable, albeit with limited growth prospects. However, the documents related to housing need unrealistically assume that local jobs will rise by a third. This increase is clearly unrealistic and inconsistent with Tandridge.
- National planning policy makes clear that Councils should act to protect Green Belt land in their Local Plans yet most of the options assume that significant amounts of Green Belt will be released for new housing. Most of the sites that have been classed as “deliverable and developable” are located in the Green Belt.
- Building on the scale proposed would destroy the rural character of the District forever.

- The documents show that the rate of house building in Tandridge since 1980 has been consistently higher than the rate in the rest of England – in some years more than twice as high.
- All this new building has not resulted in either more affordable housing for local people or economic growth – instead it has resulted in large inward migration from London and accelerated loss of local employment as business locations are converted into housing. The proposals in this Plan would bring more of the same but on a much larger scale.
- The Council's shortage of money should not be a factor in deciding how many new houses to build and how much inward migration to take. In recent years, the Council has become heavily financially dependent on the money it gets from the New Homes Bonus. The more it builds, the more it gets.

COMMENTS ON INFRASTRUCTURE

- This scale of building would put intolerable and unsustainable pressure on infrastructure such as schools, health services, roads, rail services and parking which are already struggling to cope with the existing demand placed upon them. Other services, such as water, landfill and cemeteries are also at capacity. More large scale development would be even more untenable for the District's infrastructure.
- There is a wait of two weeks or more for an appointment at Oxted Health Centre , the schools are full, there are major problems with parking, roads, rail services and other infrastructure.
- The Council's infrastructure documents give no idea what or how new infrastructure will be provided to meet the increase in population that is proposed. In some instances, the documents appear misleading. For example, regarding GPs services, the Council state they have written to all 10 surgeries in the District but received no replies and have therefore concluded that: *"there is no indication of any specific requirements at present."* It seems unjustified to come to such a conclusion based on no response, especially when there is clear evidence that there are problems meeting existing demand, let alone the demand from the proposed huge increase in population.

NB: OLRG has now learned that Oxted Health Centre have said they never received any letter from Tandridge Council's Planning Department asking for their views on the impact of the new development proposed in the Council's Local Plan documents.

It seems very surprising that the Council did not make sure the Health Centre had received its letter, especially as the Health Centre is right next door to Tandridge Council offices.

- The documents show virtually no new school places are planned. Any school place planning that has been done is based on the projected population growth in the current Local Plan – almost four times lower than that which is now being proposed.
- The documents say that more than 60% of employed residents commute out of Tandridge to work, most of them by car. The rail services are already overcrowded. Again, the documents seem misleading because they do not make clear that there is no provision to increase services in the train operators' 20

year plan. Local bus services are being reduced. This means travelling to work by car will be the only option. We believe this is unsustainable and so contrary to the National Planning Policy Framework.

- Some parts of the District have already had a 34% rise in population with virtually no new infrastructure.

- We cannot see how sites can be deemed "deliverable and developable" when the new infrastructure that would be needed to support the housing built on them, has not been assessed nor has it been shown how it can be provided. Government guidance requires that infrastructure be assessed during the HELAA process.

- The Council has made no evaluation of the infrastructure's ability to cope with housing on the sites they have identified as "deliverable and developable." It has not considered provision of health services, schools, roads, parking, rail services or any other services. It has not factored in the existing infrastructure deficit. What this means is that the full impact of the Council's "delivery strategies" has not been identified and so residents are being asked to choose an option without having all of the necessary information.

COMMENTS ON THE GREEN BELT ASSESSMENTS - these assessments are important because they will be used to judge how well land fulfils the purposes of the Green Belt – the less it fulfils them, the more chance it could be removed from the Green Belt for housing development.

On this link <http://bit.ly/1 YtPs7R> click on "GREEN BELT ASSESSMENT APPENDIX D" to see how the Council have assessed the importance of the Green Belt near you. The Council have split the Tandridge Green Belt into 47 parcels and assessed each one against the first 4 of the 5 purposes of the Green Belt contained in paragraph 80 of The National Planning Policy Framework which are:

to check the unrestricted sprawl of large built-up areas;

to prevent neighbouring towns merging into one another;

to assist in safeguarding the countryside from encroachment;

to preserve the setting and special character of historic towns; and

to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- We have found the Council's assessments to have numerous errors and inconsistencies and so please include in your comments any errors that you find and also highlight how the Green Belt parcel near you meets all or any of the 5 purposes.

- The methodology used by the Council for the Green Belt assessments is flawed, as evidenced in a leading planning QC's opinion which highlighted a number of problems with it. This opinion was submitted to the Council in June 2015 but it did not correct the methodology. The assessments are neither reliable nor robust.

- As well as problems with the methodology and the many inconsistencies and factual errors, much information is missing and important historical evidence has been omitted.

- The combination of an inflated need figure and flawed Green Belt assessments may mean an Inspector examining the Local Plan might conclude that it is unsound because the Council has put forward an unjustified release of Green Belt

COMMENTS ON THE COUNCIL'S OPTIONS (DELIVERY STRATEGIES) We have now taken legal and planning advice which has made very clear that none of the options are sound, justifiable or in line with national planning policy.

Option 1 proposes no new building and has already been ruled out by the Council (see footnote 3 on P32 of the "Issues and Approaches" document). We do not understand why it has been included as an option.

- **NB: None of the options is sound, justifiable or in line with national planning policy.**
- Most of the options (numbers 3 - 6) propose large amounts of building on the Green Belt, as well as open spaces/recreation grounds, and require the Green Belt boundaries to be changed. These options are based on an unreliable needs figure which includes unrealistic economic assumptions that are being used to justify extensive release of Green Belt for inherently unsustainable development.
- The Green Belt is crucial to the character of Tandridge District. Building on the scale proposed in options 3-6 would destroy the character of the area.

COMMENTS ON THE COUNCIL'S ISSUES AND OBJECTIVES

The issues do not reflect the character of Tandridge and they are not consistent with the rest of the documents. The National Planning Policy Framework requires Local Plans to be evidence-based, and our analysis of the Issues shows that most of them are either inconsistent with the evidence base, or statements of fact that have little to do with Tandridge.

- The most important issues are to protect the local environment and the Green Belt and to protect local infrastructure from being swamped by over-development. These issues have not been addressed in the Local Plan documents.
- The objectives make no mention of protecting the local environment from massive over-development or of protecting the Green Belt.
- The objectives appear to be a wish list of what would happen in an ideal world and not reasonable and proportionate. Local plans are supposed to be reasonable and proportionate, not wish lists. The Plan gives no idea of how any of the objectives are to be achieved.

COMMENTS ON CONSULTATION OF COMMUNITIES

- The Council has not allowed any contact or consultation with residents groups or Parish Councils by the new consultants who have drawn up the housing need figure. Previous consultants, contracted to

do the same work and who held workshops with residents groups/Parish Councils, were sacked by the Council in May 2015 and new consultants were employed at considerable cost to the taxpayer.

- A leading planning QC's opinion provided to the Council highlighting flaws in the Green Belt Assessment methodology was not incorporated into that methodology. The Council proceeded with a flawed methodology and we believe have now produced flawed Green Belt Assessments.
- The National Planning Policy Framework makes clear that local authorities should work with their communities in drawing up a Local Plan that reflects the distinctive characteristics of the area and the needs and priorities of local residents – in particular, in paragraphs 1, 155 and 69. The Council has not met the requirements for community consultation. Where communities have attempted to have input, that input has not been properly considered.
- The way the consultation has been presented is highly confusing.
- The Local Plan is a very important document that will affect the future of all Tandridge residents. Therefore, much more effort should have been made to make details widely available and accessible. The lack of clear and easily accessible information that fully explains the implications and impact of each of the options severely hinders the ability of residents to make informed decisions or indeed to take part at all.
- There are many Tandridge residents without the internet access needed to read the documents in the way they have been presented. These residents may only access the documents by visiting a public library or the Council Offices in Oxted. It is unreasonable to expect them to read such a mass of documents in this way and they have been badly disadvantaged.