

Oxted & Limpsfield Residents Group Representation to the Regulation 18 Tandridge District Local Plan Garden Villages Consultation

1.0 Introduction and Summary

This representation to the Regulation 18 Tandridge District Local Plan Garden Villages Consultation is submitted to Tandridge District Council by Oxted & Limpsfield Residents Group (OLRG), a residents' association with more than 2,800 members, from Oxted and Limpsfield and across Tandridge. OLRG was formed in 2008 and has actively participated in planning policy matters for the District, including engaging a barrister to support the adoption of the 2008 Core Strategy at the Examination. OLRG, Caterham-on-the-Hill and Woldingham Parish Councils were joint Rule 6(6) parties at the 2014 Whyteleafe Road, Caterham, Public Inquiry into the Tandridge District Council five-year Housing Land Supply and gave extensive evidence on calculating objectively assessed need for Tandridge.

OLRG were so dismayed by the early emerging Local Plan documents that we stood for election to Tandridge District Council and our candidates were elected in 2016 with large majorities, one of them defeating the Council Leader by a wide margin. Our canvassing uncovered significant concerns about the emerging Local Plan among our constituents. As more information has been published, these concerns have become more widespread and are now shared by many residents and groups around Tandridge. The two OLRG Councillors have recently joined with two Independent (former Conservative) Tandridge District Councillors representing Lingfield and Caterham who are similarly concerned about the Local Plan.

The Council has chosen not to formally consult on the Preferred Strategy in developing the Local Plan and so the current "Garden Villages" consultation is the only opportunity to explain why the Preferred Strategy is not compliant with the National Planning Policy Framework (NPPF), does not reflect the distinctive characteristics of Tandridge or the needs and priorities of residents in the District. There is a complete lack of "local" in the approach which has been apparent from the first Regulation 18 Consultation, Issues and Approaches, in 2015, and on which we made extensive representations.

The Preferred Strategy, which includes the proposed garden village, is fundamentally misconceived and contrary to the NPPF because important sustainability factors and constraints that should have been taken into account have been ignored from the very start, including:

- Travel to work patterns and the existing dominance of the car for access to employment, services and infrastructure. Current residents also regularly travel to other districts, mostly by car, to access services and infrastructure because availability in Tandridge is limited. The Preferred Strategy and its proposed garden village locations exacerbates existing unsustainable travel patterns with the consequent negative impacts on the environment, communities within and outside of Tandridge, and important nearby natural assets like the Ashdown Forest, as

highlighted in the supporting documents accompanying the garden village consultation.

- Inadequate Housing & Economic Land Availability site Assessments (HELAA) which do not take into account the assessment criteria identified in the Planning Practice Guidance (PPG) and the NPPF, including identifying constraints. These assessment criteria will affect the availability, suitability and viability of any of the possible sites in the Preferred Strategy, including the proposed garden village sites, all of which are located in the Green Belt, and are rural with very limited existing services or infrastructure.
- The Green Belt has either been ignored or sidelined from the start. The process has not correctly interpreted the NPPF or the PPG with regards to the Green Belt. This incorrect interpretation has been repeatedly used in Council documents published with each of the Regulation 18 consultations. In addition, the Preferred Strategy (including all of the garden village locations) assumes that exceptional circumstances exist, but these have never been identified.
- Although the Preferred Strategy recognises that there is an existing infrastructure deficit, the evidence documents do not consistently reflect this and so the type and availability of existing services and infrastructure provision is understated, for example in the Settlement Hierarchy. As a consequence, sustainability is overstated, and even more so given the fact that reliance on the car has been ignored. In addition, the need for future provision is either understated or ignored, and so the constraints and costs associated with development are also understated.
- The reliance on other districts for services and infrastructure has also either been ignored or understated and so the impact on these other districts from both the significant increase in inward migration into Tandridge arising from the Preferred Strategy and the reliance on the car has not been taken into account. This means that the scope of the duty to cooperate discussions has not been correctly identified from the very start. While we recognise that duty to “cooperate” does not mean duty to “agree”, it is important to understand that in the case of Tandridge, the consequence of no agreement in the Preferred Strategy is that residents (existing and new inward migrants) could be left without access to essential services, including schools, social services, GPs and hospitals. There can be no “community benefit” to Tandridge or any of the communities in nearby districts arising from such a situation.
- More than 90% of the projected population increase that underpins the Objectively Assessed Need (OAN) is due to net inward migration which is not attributable to Tandridge. The amount of projected net inward migration is due to historic overprovision in Tandridge and underprovision elsewhere, which led to Tandridge inadvertently soaking up unmet need from these other districts. This past has been mechanically projected into the future, and so it is not a reliable indicator of future population trends in Tandridge. In addition, there has been no separation into the components of population change -- natural change and net migration -- in the evidence documents, despite the fact that the impact of these two drivers on all aspects of the emerging Local Plan, including housing, services and infrastructure are very different.

For all of these reasons, the Preferred Strategy is contrary to the sustainability objectives of the NPPF, does not reflect the distinctive characteristics of Tandridge or the needs and priorities of its residents.

The structure of this document is as follows:

- **The Preferred Strategy summary section** is followed by individual sections that each contain overarching comments followed by the implications for the garden villages consultation. These sections are: Travel to work patterns and the dominance of the car, Spatial Approaches Topic Papers and the HELAA, Settlement Hierarchy and Sustainability, Duty to Cooperate, Green Belt Assessments and exceptional circumstances, and OAN.
- **The 2017 Local Plan Garden Villages consultation:** This section contains numerous examples where the consultation documents conflict with the Preferred Strategy and other evidence documents. We also highlight some material factual errors.
- **Community Engagement and Misdirection:** This section includes numerous examples of where the Council has published documents and press releases that conflict with the NPPF and/or mislead the public, dating back to the 2015 Regulation 18 consultation. We have included this section because we believe that the level of repeated misdirection of the public by the Council throughout the Local Plan process is such as to materially affect the integrity of the public consultation exercise.

This representation is in addition to, and should be read in conjunction with all of our previous consultation responses:

- The Collective Regulation 18 Representation, supported by 11 Parish Councils and 7 community groups around the District submitted for the 2015 Regulation 18 Consultation to the Council's Local Plan Issues and Approaches document.
- The separate OLRG representation to the 2015 Regulation 18 Consultation.
- The OLRG Representation to the Council's Regulation 18 Tandridge District Local Plan Sites Consultation submitted in December 2016.

Our submissions have been reviewed by legal, planning and demographic experts.

2.0 Preferred Strategy Summary

The "Garden Village" is only one part of the Council's Local Plan Preferred Strategy.

The Preferred Strategy comprises Approaches 3 and 6 from the 2015 Issues and Approaches document. The Preferred Strategy proposes:

- i) A "Garden Village" in the Green Belt of more than 4,000 homes.

ii) Building in the Green Belt around the Tier 1 and Tier 2 settlements which are Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Godstone, Lingfield and Smallfield.

iii) Building on the District's open spaces.

iv) Removing villages that are currently in the Green Belt from the Green Belt, thereby enabling development.

v) Infilling within the existing settlements.

The following sections include comments on both the Preferred Strategy and the implications for the Garden Villages consultation.

3.0 Travel to work patterns and the dominance of the car

Travel to work patterns and the dominance of the car to access employment services and infrastructure have been ignored from the start of the process. We illustrate this using the Settlement Hierarchy which is used to identify the Tier 1 and Tier 2 settlements which form one pillar of the Preferred Strategy.

While the Settlement Hierarchy documents ignore travel to work patterns and the dominance of the car, they also boost sustainability rankings where settlements have access to the strategic road network. This approach is taken despite the recognition by the Council in the Settlement Hierarchy that this approach undermines sustainability and so is contrary to the NPPF.

This is explained in the following extracts from the Settlement Hierarchy Methodology (ed: emphasis added):

Travel to work patterns. The NPPF is clear that unsustainable travel patterns should not be exacerbated and access to jobs near homes should be available to ensure sustainability...

Whilst this certainly is a valid consideration in terms of developing sustainable communities, it is not realistic to assume that if there is a local job, it will be taken by a local person. Further, Tandridge District has excellent links to London where the highly skilled residents can find a variety of well-paid positions and it is not plausible to think that the local area or surrounding districts and boroughs can compete with this.

Employment is about choice and therefore, consideration of travel to work patterns will not produce sound conclusions that would influence the settlement hierarchy.

Page 63: Justification for omission.

Car ownership/Usage

An over reliance on the private vehicle is often considered to be a factor which undermines sustainability. Whilst areas which need to rely on the private car due to a lack of public transport are not ideal, the decision to use a car is somewhat subjective. The use of private vehicles can be determined by choice with many choosing to drive despite there being buses or trains.

...For these reasons, this aspect was not accounted for in the assessment process.

However, in another part of the Settlement Hierarchy Methodology, access to the Strategic Road Network is used to increase the sustainability ranking, as follows (Table 2, Scoring Mechanism, Page 25):

Whilst more sustainable modes of transport are encouraged, the use of the private car cannot be avoided and remains a preference for many which is often the case in more rural areas where public transport can be more limited or is impractical, particularly for businesses. With this in mind an element of pragmatism must be employed and those settlements with access to the key roads on the Strategic Road Network (SRN) will be considered more sustainable than those with non-strategic road access. Weighting has been attributed in recognition of this as an asset to sustainability.

First, this approach is inconsistent because in the first set of paragraphs the dominance of car travel in travel to work patterns is ignored because it is a “choice”, while in the second set of paragraphs the “use of the private car cannot be avoided” and so access to the strategic road network is considered an asset to sustainability. This approach overstates sustainability because factors that are recognised to undermine sustainability are ignored while those same factors are used to improve rankings. The consequence of this biased and inconsistent methodology is that both Tandridge itself and the individual settlements are shown to be more sustainable locations than they actually are.

Because reliance on the car has been ignored from the very start, the polluting effects on protected areas, the local environment, the atmosphere, and local communities from the significant increase in traffic were not taken into account when the initial Approaches were defined and consulted on in 2015.

This choice was made despite the increase in traffic, congestion and pollution that was identified in the 2015 Strategic Highway Assessment Report released in the 2015 Regulation 18 consultation. Page 5 of this document explains:

Scenarios 3 (ed: Tier 1 and Tier 2 development, not including a garden village) and 5 are forecast to have the greatest impacts, both in the south and north of the district, including Smallfield and Caterham. In some locations effects are expected to be experienced some distance from the proposed development locations reflecting the potential cumulative impact on existing roads and junctions. This includes some impacts across the boundary, especially to in [ed: sic] the north east and in the south and south-west of the district.

There are forecast to be limited number of trips added to the motorway network.... However, parts of the motorway network in the area are forecast to

be either approaching or already operating overcapacity by 2031 so any additional trips may have more of a significant effect.

The 2017 Transport and Accessibility Assessment qualitatively assesses the transport impact of just the individual garden village sites (and not the whole of the Preferred Strategy). This document also comments that the motorway is now forecast to be at capacity eleven years earlier even without any further development, as follows:

2.5.5 Highways England have stated that the M25 junction 6 will be at capacity by 2020. The effect of this development (garden village at South Godstone) would be to further exacerbate the forecast situation.

In other words, the 2015 evidence showed significant traffic and congestion extending from the south to the north of the district and into other districts arising from implementing just Approach 3, which is only one pillar of the Preferred Strategy. The more recent qualitative transport evidence shows significant added congestion when just the garden village sites are assessed.

It can only follow that the cumulative impact on traffic and congestion arising from implementing the whole of the Preferred Strategy will be even more significant than what is shown in any of the piecemeal assessments thus far. The extract from the most recent transport assessment is also an illustration of how unreliable transport modelling can be, given that in just two years, the date when motorway capacity was forecast to be reached was brought forward by eleven years.

Another consequence of the failure to properly consider car usage is that the Preferred Strategy was conceived without consideration of the adverse environmental impact on the protected habitats of the Ashdown Forest, which is designated as both a Special Protection Area (SPA) and Special Area of Conservation (SAC) under the EU Habitats and Bird Directives. This applies equally to the adverse impacts upon the Mole Gap to Reigate Escarpment which is a designated SAC.

The Habitat Regulations Assessment Stage 1: Screening included in the Garden Village Consultation documents says that, at this stage:

*“it is not possible to determine that the Plan would **not** have a likely significant effect on the protected sites”* The factors which cannot be screened out are:

Ashdown Forest SAC and SPA

- Risk of increase air pollution at the Ashdown Forest.
- Risk of increase in recreational disturbance at the Ashdown Forest SPA, affecting the ground nesting birds.

Mole Gap to Reigate Escarpment SAC

- Risk of increase in air pollution ;
- Risk of increase in recreational disturbance, affecting the chalk grassland; and
- Risk of increase in water pollution

A corollary of this is the additional recreational pressures that will be put on protected habitats by the Preferred Strategy. The Strategy includes building on open spaces (including those in Council ownership). That process is already underway and so lessens the amount of recreational space available for its own residents, which is detrimental to the community.

It is worth noting that Paragraph 3.7 of the Preferred Strategy sets out an amended Health and Wellbeing Objective to protect open spaces which is in conflict with the Preferred Strategy and the Council's current policy of selling off open spaces for housing development.

The loss of open spaces and the fragmentation of the existing countryside from the Preferred Strategy and the proposed garden village will also mean the only option for residents who seek to enjoy uninterrupted countryside is to drive to areas such as the Ashdown Forest for recreational purposes. The Forest is within 15 kilometres of the garden village locations Blindley Heath and Land west of Edenbridge and little further from the South Godstone location.

These important sustainability factors were ignored from the very start despite having access to evidence in 2015 that clearly showed dominance of the car in travel to work patterns, extensive reliance on the car to access services and infrastructure (within and outside of Tandridge), and the adverse impacts arising from this (within and beyond Tandridge) in the initial Approaches contained in the 2015 consultation.

The consequence of this is that the fundamental direction taken for the emerging Local Plan was misguided and contrary to the sustainability objectives of the NPPF from the very start.

3.1 Implications for the garden village consultation

The supporting documents accompanying the 2017 garden villages consultation confirm reliance on the private car for all of the proposed garden village sites.

These impacts are all understated, because, as explained above, this set of documents assesses just the garden village in isolation and so the cumulative impacts arising from the other pillars of the Preferred Strategy (e.g. development around Tier 1 and Tier 2 settlements and the newly inset villages) have not been assessed. This omission is particularly relevant for traffic and pollution because congestion is cumulative and can have widespread effects far beyond the development sites themselves.

The impacts are also understated because the Sustainability Appraisal was conducted on the basis of a development of 2,000 homes whereas all four locations have a considerably higher number of homes listed in the Garden Villages Consultation document. The 2017 Transport and Accessibility Assessment has been undertaken by Surrey County Council on the basis of only 2,000 homes for South Godstone and 2,000 - 2,500 for Blindley Heath. However, the Garden Villages consultation document states "4,000 homes" for the area north of South Godstone and "approximately 5,000 homes" for the area south of South Godstone. For Blindley Heath, the figure quoted is "approximately 3,100 homes."

This means that the traffic, pollution and other adverse impacts and consequent negative scores should be much higher than shown in the documents. The traffic impact will also be much greater and far ranging when the cumulative effect of all pillars of the Preferred Strategy are taken into account.

Some examples from the Sustainability Appraisal Regulation 18 - Potential Garden Village Locations 2017:

Blindley Heath Paragraph 3.2.11:

“Air quality is likely to diminish should development go ahead at the potential Garden Village location. This is because of increased GHG emissions due to expected high personal car usage, the temporary effects of construction and the loss of green infrastructure which currently acts as a natural air filter for the area.”

West of Edenbridge Paragraph 3.4.11:

“Given the relatively limited access to sustainable transport methods, personal car use is considered likely to lead to an increase in local traffic, with a reduction in local air quality a probable outcome.”

Redhill Aerodrome Paragraph 3.5.7:

“Given the relatively limited local access to sustainable transport modes, it is considered likely that residents of the potential Garden Village location would rely heavily on personal car use. GHG emissions are therefore anticipated to increase substantially at the potential Garden Village location.”

South Godstone Paragraph 3.6.12:

“Some areas of the Garden Village may potentially suffer adverse impacts on air quality from the A22. The construction of at least 2,000 homes and the potentially high levels of personal car use in-combination with the likely loss of trees and vegetation that act as a natural air filter are anticipated to reduce air quality at the potential Garden Village location.”

All four of the broad areas proposed for a garden village rely very heavily on access by car either via small rural roads and also, in the case of Blindley Heath and South Godstone, via the already heavily congested A22.

For Redhill Aerodrome, the promoters and Surrey County Council are both clear that the development cannot proceed without a spur and link road from the M23. This has implications for whether the proposed development could even be started within the plan period to 2033. TDC recognises this, referring to a possible commencement date “15+ years from the point of Local Plan adoption” in its main consultation document.

There are SSSI at Blindley Heath and at Godstone Ponds. However, neither the standalone nor the cumulative impact on the air pollution and hydrological effects on these areas have been considered. The 2017 Sustainability Appraisal for the Garden Villages recognises the threat to sensitive habitats and the negative effect on biodiversity:

Biodiversity

4.1.4 It is thought likely that at many of these locations priority habitats such as hedgerows, arable field boundaries and woodland will be partially or wholly lost as a result of development. Furthermore, such a large development has the potential to further fragment and isolate habitats or to result in a loss of some of its supporting habitat. With the introduction of several thousand new residents to the countryside, increased recreational pressures on sensitive habitats is also a concern.

The loss of valuable agricultural land is another negative impact from the Preferred Strategy and the proposed garden village locations as shown by the following quote from the Sustainability Appraisal:

Soil

4.1.9 Approximately 60% of the district's land is used for agriculture⁴⁹. Soil within the district is therefore a highly valuable non-renewable resource. Many of the potential Garden Village locations are located on previously undeveloped and Grade 3 agricultural land with opportunities for developing on contaminated land being very limited. Development would therefore be likely to result in the loss of some of the district's most versatile and productive soils.

It also recognises the increase in noise and light pollution at all the locations stating in Paragraph 4.17.3:

...a Garden Village is highly likely to increase noise and light pollution in areas which were otherwise tranquil and minimising this impact is difficult to achieve.

When the evidence is considered fairly and as a whole, it is apparent that the Preferred Strategy and the proposed garden village locations can only exacerbate existing unsustainable travel and cause irreparable harm to the environment, both of which are contrary to the NPPF.

4.0 Spatial Approaches Topic Papers and the HELAA

The Spatial Approaches Topic Papers purport to assess land within the District by reference to "tiers of constraint" but do so without any reference to one of the most important constraints of all, namely the question of whether land is within the Green Belt. Indeed, paragraph 3.17 of the 2015 paper specifically excludes consideration of this stating:

As such the broad areas of search within this document do not take account of the policy restriction that the Green Belt boundary applies.

This conflicts with NPPF paragraph 14 which recognises the Green Belt as a constraint:

14. At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For **plan-making** this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.⁹

⁹ For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

The PPG expands on this by explaining that assessing need is the first step and then constraints should be taken into account (ed: emphasis added):

*“However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and **in so doing take account of any constraints such as Green Belt**, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”*

In addition, the paper ignores Chapter 11 of the NPPF in its assessment of the relevant parts of the NPPF.

It is no answer to this to say, as paragraph 3.17 does, that it is not the purpose of the paper to consider whether exceptional circumstances exist. This overlooks the point that the very need to show exceptional circumstances is itself a constraint.

In drawing up the HELAA, the Council has taken no account of the Green Belt. It has again attempted to justify this omission in its Statement of Consultation published with the 2016 Regulation 18 Sites Consultation. On page 1103, it asserts:

The PPG is looking at a HELAA that you would produce throughout your plan period where, having established a 20 year plan you can apply the adopted and up to date policy constraints from within it. This is not the case here. This is a HELAA to underpin a Plan where the very policies on which the Plan is based are being considered.

And on page 1116, it asserts:

The previous SHLAA was looking at the position in respect of an adopted Plan. This is not the case here. This is a HELAA to underpin a Plan where the very policies on which the Plan is based are being considered.

The PPG requires that the HELAA identify all of the relevant constraints to establish realistic assumptions. The Council's argument appears to be that, because "*the very policies on which the Plan is based are being considered*", this entitles the Council to draw up its HELAA as if it was starting with a blank slate.

However, it is impossible to reconcile this approach with the longstanding principle that Green Belt boundaries should only be changed in exceptional circumstances. It is self-evident that this principle requires continued recognition of existing Green Belt boundaries to be the starting point when bringing forward a new Plan. There is no provision in either the NPPF or PPG for a different version of the HELAA which excludes the Green Belt as a constraint. It also follows that the need to show exceptional circumstances is also a constraint which should also be included in the HELAA. The Council's comments appear to fundamentally misunderstand the PPG, the NPPF and past and present Green Belt policies.

The existing services and infrastructure (including essential services like water, power, and only in some areas, mains sewer and gas) were built on a scale consistent with serving small, compact rural communities and so their capacity is inherently limited. The lack of services, infrastructure and other constraint assessment in the HELAA was identified in both the 2015 Collective Regulation and the OLRG 2016 Site Consultation representations. More than 18 months later, these omissions have still not been addressed and so the Preferred Strategy is based on these incomplete and flawed assessments.

4.1 Implications for the garden village consultation

It is clear that the Government expects Councils to proactively plan for the services and infrastructure needed to accompany development and to specifically set out the type of infrastructure required and how this will be funded and delivered. The PPG (and the NPPF) supports this by setting out a list of assessment criteria and other considerations.

However, the Council's Housing and Economic Land Availability Assessments state that large numbers of Green Belt sites, including the proposed garden village locations, are "deliverable and developable" without the necessary assessment work being done.

The PPG (paragraph 031 Reference ID: 3-031-20140306) also requires that constraints, such as lack of infrastructure, be considered when assessing whether a site is "deliverable", but none of the required assessment has been done in the HELAA.

Paragraph 8.3 of the 2016 Regulation 18 Sites Consultation document states that a delivery plan for the necessary infrastructure to accompany the "new or extended settlement" would be included in the Preferred Strategy:

“At the next stage in the Local Plan process, the Council will determine the preferred delivery strategy for the Local Plan. A new or extended settlement could form part of that strategy should the Council have sufficient evidence to pursue this. Before this decision can be made either way, more evidence gathering will be needed to inform the approach, in addition to the comments received through this consultation. This would include the delivery plan for necessary infrastructure.”

Despite this public commitment, no such delivery plan has been included either in the Preferred Strategy (March 2017) or in the 2017 garden village consultation documents.

Policy constraints

The Interim Focused Housing and Economic Land Availability Assessment – Broad Locations August 2017 states at Paragraph 3.22:

Existing policy constraints including Green Belt have not been applied to the suitability assessment for broad locations and along with infrastructure considerations, is a matter for the wider Local Plan process. This HELAA determines whether a broad location is suitable for further consideration only.

It is difficult to envisage what constitutes the “wider Local Plan process” given that this is the third Regulation 18 consultation in as many years and that thousands of pages of documents have so far been produced.

The Interim Focused Housing and Economic Land Availability Assessment – Broad Locations August 2017 demonstrates the same approach to ignoring policy constraints as the previous HELAAs, stating at Paragraph 2.6:

“The Council is preparing a Local Plan which will replace the Core Strategy and will be using its evidence base including this focused interim HELAA and subsequent full reviews, to inform the Local Plan’s preparation. As such, sites assessed as part of the HELAA process are done in a ‘policy-off’ manner in that they are not judged in detail against current local planning policies the way a planning application would be, although regard may be had to current policies to provide appropriate context.”

As with the Green Belt and the need to show exceptional circumstances, this approach fails to recognise that the need to overturn existing planning policies (which may include recently adopted and NPPF compliant Tandridge Local Plan Part 2 and existing Neighbourhood Plans) is itself a constraint.

5.0 Settlement Hierarchy and Sustainability

As explained in Section 2, one pillar of the Preferred Strategy is development around the Tier 1 and Tier 2 Settlements. These have been chosen based on a settlement sustainability ranking methodology that overstates the sustainability of the settlements and of Tandridge District itself.

In addition to ignoring travel to work patterns and reliance on the car, the Settlement Hierarchy Methodology portrays settlements as being larger and having more extensive facilities in terms of retail, services, employment and infrastructure than they actually have. For example:

- In our own area of Oxted: to assess “health provision”, the methodology combines together chemists, GP surgeries and hospitals. This leads to Oxted having a high score of 5 despite the fact that it has no hospital and only one GP surgery serving a very wide area that incorporates Oxted, Limpsfield and Hurst Green. This methodology is unreliable because a chemist cannot be considered equivalent to a GP surgery, let alone a hospital. The consequence of the grouping in the scoring system is that Oxted appears to be far better served with “health provision” than it actually is. The Oxted GP surgery is heavily over subscribed with long waiting times for appointments and this has not been considered anywhere.
- Settlement employment is scored with a simple one-zero which takes no account of the amount or type of employment (e.g. part-time vs. full-time, wage levels, sectors) compared to the size of the local labour force. In other words, a rural settlement with a small one-stop shop that employs part-time staff is given the same score as a larger settlement. This makes smaller settlements appear to have more employment than they actually have.

In addition, both the 2015 infrastructure and retail studies show that most of the rural settlements classed as “sustainable” are in fact reliant on other districts for services and infrastructure, which are accessed mostly by car.

This flawed methodology leads to settlements being classed as “sustainable” when they are not. This methodology also ignores the reliance of these settlements on other Districts, which means that Duty to Cooperate discussions do not reflect the full scope of employment, services and infrastructure that other Districts are being expected to provide to support the Tandridge Preferred Strategy. We provide an example of this in Section 6.0.

6.0 Duty to Cooperate

The evidence documents show an existing reliance by the District on services and infrastructure located in other areas. This is consistent with Tandridge being a predominantly rural district with no recognised, sustainable economic centres.

However, the Council has not recognised the impacts on other Districts arising from the Preferred Strategy and so has not provided any evidence of how it will co-operate with neighbouring authorities to deliver the services and infrastructure necessary to support the Preferred Strategy and the proposed garden village.

As explained above, while we recognise that duty to cooperate is not a duty to agree, the consequences of no agreement is that existing and future residents of Tandridge will either not have access to essential services and infrastructure, or, at best, have to compete with the residents of other districts for these services. There can be no benefit

to any community arising from such a situation and it is a far cry from the “sustainable development” envisioned by the NPPF.

6.1 Implications for the garden village consultation

The lack of engagement and correct scoping of duty to cooperate discussions is illustrated by the proposed Garden Village location “Land West of Edenbridge” which is a cross-boundary site split between Tandridge District Council and Sevenoaks District Council (SDC). The letter from Edenbridge Town Council about the Garden Village area “Land West Of Edenbridge” and included at Appendix 1, highlights the lack of engagement with SDC.

This letter explains that the site is not in line with the SDC emerging issues and options consultation draft and as such would be unlikely to be a site that was included in the final SDC draft Local Plan. Nevertheless, Tandridge District Council has proceeded with consultation on the site only with Tandridge residents despite the fact that there have been no cross boundary discussions regarding this site.

As this letter goes on to explain, this lack of engagement calls into question whether this site is a genuine alternative, stating:

The Council can only assume that the lack of response on Tandridge’s part is due to the short comings of the proposal which make it extremely unlikely to meet the required criteria for it to progress.

This letter also comments on the “*silence*” from Tandridge District Council regarding how the proposal will achieve any of the requirements for sustainable development - economic, social and environmental - set out in Paragraph 7 of the NPPF. We consider that these comments apply equally to all four of the proposed garden village locations and the Preferred Strategy itself.

This letter also identifies some of the impacts on both SDC and Edenbridge from the proposed garden village, which is, in fact an urban extension to Edenbridge. However, none of these are shown in the Tandridge documents.

The issues raised also apply to Redhill Aerodrome, another cross-boundary location this time with Reigate and Banstead Council. Development at Redhill Aerodrome would lead to coalescence of the Green Belt between South Nutfield and Salfords/Whitebushes, contrary to one of the purposes of the Green Belt.

The issues raised also apply to the other two proposed locations where, although the land is wholly within Tandridge District, residents also rely on services and infrastructure outside of the District. For example, for Blindley Heath and South Godstone (and many other residents of Tandridge), the nearest hospital is at Redhill as the Garden Villages Sustainability Appraisal explains:

South Godstone Paragraph 3.6.3:

The nearest hospital providing emergency services is the Surrey and Sussex Healthcare NHS Trust at East Surrey Hospital, over 8km west of the potential

Garden Village location at its nearest point. This hospital is currently operating at 91.5% bed occupancy, slightly above the national average of 87.5%

This is an example of where nearby essential services are recognised to be at capacity, and where the implications of this on the Preferred Strategy and the garden village have not been taken into account.

Other facilities, too, are outside of Tandridge:

Blindley Heath Paragraph 3.2.2:

“...access to leisure centres and sports facilities are also limited with the closest facilities, Oakwood Sports Centre in Horley, over 6km away for the majority of prospective residents.”

Development around the Tier 1 and Tier 2 settlements would also have an impact on services and infrastructure outside of the District and this, too, has not been taken into account in the Duty to Cooperate discussions.

The lack of services and infrastructure is consistent with Tandridge being a rural district that is reliant on other Districts which is explained in a number of the 2015 evidence documents, yet this has not been taken into account in the Duty to Cooperate discussions for the Preferred Strategy or the garden village sites.

7.0 Green Belt Assessments and exceptional circumstances

The Green Belt assessments unjustifiably weaken protection for the Tandridge Green Belt by understating its importance because the five purposes have not been assessed properly.

First, the assessments appear to have been undertaken as if the land was not already designated Green Belt, and so they do not consistently consider whether there has been a material change “on the ground” that might falsify the reasons that the land was originally designated as Green Belt. The Council adopted this approach contrary to expert opinion which was provided to Tandridge District Council by OLRG during the Green Belt Assessment methodology consultation.

Second, the conclusions in the Green Belt Assessments that purposes are not fulfilled are flawed because, for example, they are based on artefacts of how the parcel boundaries were drawn in the assessment process rather than holistically considering how the land fulfils the purposes. The Collective Regulation 18 Representation and OLRG’s Sites Consultation Representation set out in more detail the flaws in the Council’s Green Belt assessments.

The Green Belt Assessments also do not assess purpose five at all (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) even though the historic pattern of development in Tandridge shows a strong pattern of recycling of derelict and other urban land because most of the former redundant public sector employment sites have been developed into housing. Paragraph 3.8 of the Preferred

Strategy now recognises a new Green Belt objective which includes ensuring that previously developed land is fully utilised. There is an inconsistency between the inclusion of this in the Preferred Strategy and the failure to assess purpose five in the Green Belt assessment.

The consequence of the flaws in the Green Belt assessment work is that the assessments conclude that much of the Green Belt land meets fewer of the purposes than it actually does and so undermine the value of the Tandridge Green Belt.

This is relevant because Paragraph 5.16 of the Preferred Strategy explains how performance against the purposes will be taken into account when considering the question of whether exceptional circumstances exist:

This test would include an assessment of how well an area performs against the purposes of the Green Belt and whether there are sufficient reasons to outweigh the designation.....

This is also relevant in the context of five-year housing land supply. Should the Council not have a five-year housing land supply at any time during the plan period, performance against the Green Belt purposes would also be considered in any balancing exercise undertaken under NPPF paragraphs 14 and 47. The Preferred Strategy only partially recognises this risk in paragraph 6.6 (ed: emphasis added):

Further, depending on the extent to which exceptional circumstances can be demonstrated, it may prove more challenging to maintain a five-year land supply. Although the inclusion of a Garden Village type concept will contribute significantly to providing homes and meeting needs, the effect of this would not be seen until much later into the plan period. As the plan is prepared this matter will need to be considered further to establish the best way to ensure that Council's housing supply is robust and that it can withstand scrutiny at examination.

However, the risk of a lack of a five year housing land supply persists for the duration of the plan period (as long as the NPPF remains in place) and is not just relevant at the Examination. It is somewhat surprising that this ongoing risk and the consequences of it have not been recognised in the Preferred Strategy.

The Preferred Strategy also proposes insetting a number of villages that are currently in the Green Belt. This is despite the fact that in 2014, the Tandridge Local Plan Part 2 – Detailed Policies Document concluded that these same villages did contribute to the openness of the Green Belt, therefore satisfying Paragraph 86 of the NPPF. This document was deemed sound by the Planning Inspectorate and adopted by the Council in 2014. Insetting these villages is another example of overturning existing planning policies which should be included as a constraint in the HELAA.

Among the villages the Council now proposes to inset is Old Oxted where a Green Belt site for 120 dwellings on the edge of the village was submitted too late for the 2016 Sites Consultation and has therefore never been consulted on. Should Old Oxted be inset, this additional site would then be adjacent to a settlement (which is one of the HELAA/spatial criteria) and so it would be caught by Approach 3. This may open up other Green Belt

sites - both around Old Oxted and other villages that are inset - depending on where the new Green Belt boundary would be drawn after inseting.

7.1 Implications for the garden village consultation

These extracts from the 2017 Sustainability Appraisal make clear that the potential locations do not meet the proposed new Green Belt objective to ensure that previously developed land is fully utilised.

4.8 Mitigating Impact of Garden Village Objectives on Previously Developed Land

4.8.1 A number of potential Garden Village locations received a double negative score for SA Objective 5 'Previously Developed Land'. This is because they represent the development of several hundred hectares of Green Belt land that has not been previously developed and at which there is very limited scope for the re-use of existing buildings.

4.8.2 There is considered to be very limited scope for Garden Village Objectives to mitigate this impact."

Exceptional circumstances

The Council has not identified what the exceptional circumstances are that justify the Green Belt release proposed in its Preferred Strategy and the garden village. The 2017 Garden Villages consultation document and the Preferred Strategy both presume that there are exceptional circumstances. Paragraph 2.9 of the Preferred Strategy says that the Council has set out in its Spatial Approaches Topic Paper: Sites Consultation (2016) what the exceptional circumstances are that it will use to justify Green Belt release and change the Green Belt boundary.

However, this paper is generic in that it merely repeats statements in the NPPF on exceptional circumstances together with quoting from some case law and does not identify what the actual exceptional circumstances the Council will use to justify the release of Green Belt assumed in the Preferred Strategy.

Similarly, Section 4 of the Spatial Approaches Topic Paper: Garden Village Consultation August 2017 provides no further detail on exceptional circumstances.

8.0 OAN

The Local Plan evidence base and evidence submitted by Tandridge District Council and by the joint Rule 6(6) parties to the Whyteleafe Road, Caterham, Public Inquiry explain that Tandridge has a very unusual combination of circumstances: an unusually low amount and rate of natural change despite the average age of the Tandridge population being similar to Surrey and England, exceptionally high past rates of house-building and significant housing underprovision in other districts, and very low self-containment. This

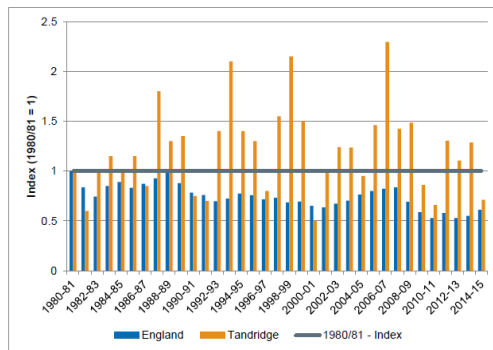
combination makes the standard projections - and any other figures that rely on those projections - unreliable and unrealistic indicators of future population trends in Tandridge.

Past house-building and the impact on historic migration flows

The exceptionally high historic rate of building in Tandridge District can be seen from the chart below which is taken from the Strategic Housing Market Assessment (SHMA): Analysis of Market Signals paper. This paper shows that the indexed rate of housing development in Tandridge has been considerably higher compared to the average for England for most years since 1980. As the SHMA: Analysis of Market Signals, paragraph 3.51, explains:

*While – at a national level – the rate of development has not been exceeded since this point, Tandridge has regularly exceeded this level of development in subsequent years. **Indeed, in three monitoring years, the rate of development has doubled.** This suggests that the rate of development has been sustained to a greater degree than seen nationally.”*

Figure 3.13: Indexed Rate of Development 1980 – 2015



Source: DCLG. 2015: Tandridge District Council. 2015

The Council has never separately published the components of population change - natural change and net migration. This is essential to understanding the drivers of projected future population changes and whether the projected results are realistic scenarios that are likely to occur as required by the PPG. Natural change and inward migration are driven by different factors and also have very different attributes.

In the 2012 and 2014 standard Subnational Population Projections (SNPP), more than 90% of the projected population increase for Tandridge is comprised of net inward migration which is not attributable to Tandridge. It is common ground that there have been exceptionally high historic rates of building in Tandridge (as the previous chart shows) and that there are numerous examples of underprovision in other districts. This combination artificially stimulated inward migration into Tandridge and the District inadvertently soaked up unmet housing need from many other areas. Outward flows from Tandridge were also suppressed due to underprovision in desired destination districts. This is explained in the SHMA evidence accompanying the 2015 Regulation 18 consultation. It was also established at the Whyteleafe Road, Caterham, Public

Inquiry that average household sizes had increased in other adjacent and nearby districts between 2001 and 2011, but not in Tandridge District.

Tandridge is not part of the Housing Market Area for any other district and so any historic unmet need that has arisen due to underprovision in these districts (higher inflows and suppressed outflows) and overprovision in Tandridge is not part of housing need that can be attributed to Tandridge. As explained previously, Tandridge is a predominantly rural district with no recognised economic centres and it is also reliant on other areas for services and infrastructure, and so there are no genuine drivers for either past or future high levels of inward migration.

The only justification given by the Council for the amount of projected net inward migration included in the proposed OAN is “lifestyle choice”, which is clearly outside the scope of housing “need.” Appendix 2 of the Collective Regulation 18 Response explains this in more detail using the evidence base documents.

These historic inflated levels of net inward migration have been captured by the standard SNPP projections with the past peak levels being mechanically projected forward to recur for 19 of the next 20 years. In other words, the amount of inward migration included in the population projections for Tandridge is circular and little more than a self-fulfilling prophecy which has no relationship to housing need in Tandridge. This means that their use as indicators of future population growth in Tandridge is very limited.

8.1 Implications for the Preferred Strategy and the garden village consultation

Services and infrastructure requirements

The separation of the components of population change is also essential to identifying the scale and associated needs of those components because natural change and migration flows have different characteristics, for example, housing, age profile and demands on infrastructure.

For example, a family of four moving to Tandridge will have different housing, service and infrastructure needs than four new healthy babies born to existing Tandridge residents. The family of four will make an immediate, greater and more widespread demand on all types of services and infrastructure and the impact of this on Tandridge and other districts has not been reflected in any of the documents.

The evidence explains that local wages are significantly lower than wages outside the District. The SHMA: Analysis of Market Signals paper explains that wages outside of Tandridge are anywhere from 20% to 60% higher than wages in Tandridge depending on the job location. The vast numbers of inward migrants relied on in the Preferred Strategy mean that the commonly used affordability ratios (e.g. average house prices divided by local wages) may actually worsen over the Plan Period.

Sustainability Appraisal

The 2017 Sustainability Appraisal (SA) incorrectly assumes that the proposed garden village will meet “local” need, when the components of change within the OAN show that the majority of the proposed population increase is due to projected high levels of net inward migration. This means that all of the garden village sites’ Sustainability Appraisal assessments incorrectly attribute benefits to the proposed garden village when that is not the case. The SA also fails to recognise the adverse impacts of the overwhelming amount of projected inward migration on existing communities, services and infrastructure – both within and outside of the District.

8.2 Garden Village key principles

The Government has set out the key principles for new garden villages in its 2016 prospectus “Locally-Led Garden Villages, Towns and Cities.”

Paragraphs 5 and 21 state that new garden villages should be built as a response to meeting local housing need. Another key principle explained in the prospectus is the need for a new village to be self-sustaining.

As explained above, neither of these principles is achieved by the Council’s proposal. The proposed garden village also does not have local support.

9.0 The 2017 Local Plan Garden Villages Consultation document

The 2017 Local Plan Regulation 18 Garden Villages Consultation document contains factual inaccuracies, inadequate information, and statements that conflict with the contents of the Preferred Strategy and other documents in the Local Plan evidence base.

Sites

Chapter 4 of the Garden Villages Consultation document states that it “*sets out the four locations that evidence gathered so far indicate could be considered as locations in the district where a new garden village could be located.*”

However, as explained in previous sections, the work required to assess infrastructure and other constraints has not been done, including flood risk assessments despite the fact that a substantial proportion of the land identified for a garden village is in high and medium flood risk zones.

The absence of detail about the proposals for the individual sites and their constraints (as listed in the PPG), and the absence of detailed assessment of transport, infrastructure, landscape and the environment, and the impact on surrounding areas indicates that even basic feasibility has yet to be completed. The lack of such essential information hinders the consultation process because respondents cannot be certain what they are commenting on.

As referenced in Section 3.1, the 2017 consultation document says that one site, Redhill Aerodrome, would not deliver any housing until after the Local Plan period (2013 – 2033). Paragraph 1.2 states the Plan “*will set out a development strategy for the district up to 2033*”. However, Redhill Aerodrome can make no contribution to the development strategy and we therefore question why this site has been included in the consultation.

Paragraph 1.2 states that (ed: emphasis added):

“The emerging Local Plan is being prepared for the wider benefit of all residents by making significant improvements to infrastructure, including those that already live here and those that may move to the area in future.”

Paragraph 1.13 states that the Preferred Strategy will prevent:

“a large amount of development being scattered across the district and reduces pressure on existing built up areas.”

All of these statements are contradicted by the later contents of the consultation document itself and by the contents of the Preferred Strategy document.

The 2017 consultation document explains that none of the proposed sites for a “Garden Village” would be likely to deliver housing until the end of the Plan period. The Preferred Strategy also says that any “Garden Village” would be a “long term” project. In the meantime, the Council will be required to have a five year housing land supply based on a proposed OAN of at least 470 dwellings per year. In order to fulfil this number, the other pillar of the Preferred Strategy, Approach 3, will be required.

Approach 3 will scattergun development in the Green Belt around Tier 1 and Tier 2 settlements around the District. It will also increase pressure on existing built up areas, for example by building on open spaces and increasing density – the opposite of what is claimed in the 2017 consultation document. This can only add to the existing services and infrastructure deficit and add to the reliance on other districts to meet these requirements.

Paragraph 1.2 also downplays the role that inward migration plays in underpinning the OAN and the Preferred Strategy by using the phrase “may move to the area”. The proposed OAN relies on net inward migration because the vast majority of the projected population increase that underpins the proposed OAN is due to net inward migration.

Infrastructure and other constraints

The 2017 consultation document claims “significant improvements to infrastructure” and Paragraph 1.21 states that

“The Preferred Strategy is an infrastructure led approach that ensures new development is capable of delivering not just homes but also infrastructure improvements, including transport improvements, new open spaces and play spaces.”

However, Paragraph 4.21 of the Preferred Strategy explains that delivering the necessary infrastructure is a “significant challenge” (ed: emphasis added):

So whilst a preferred strategy may be capable of meeting the development needs, the ability to accommodate the infrastructure required will be a significant challenge, and the right strategy to get the most return in terms of infrastructure will be adopted

No details about what “the right strategy” might be have been included in any of the documents.

The Council recognises the existing infrastructure deficit in Paragraph 4.20 of the Infrastructure section of the Preferred Strategy while also stating that there will be no “quick-fixes” for these existing infrastructure deficits.

In effect, the Council’s Preferred Strategy states that even with the quantum increase in house-building being proposed in the Preferred Strategy, any infrastructure improvements will remain a “significant challenge”.

However, the Council has stated in its Public Relations material that a new garden village will deliver new primary and secondary schools and healthcare facilities. However, the Local Plan evidence documents do not support this and there are no infrastructure requirements or delivery plans in any of the documents. This is just one example of the disconnect between what the Council has said in public statements and what is actually included in its Local Plan evidence (see section 10 of this submission, Engagement with the Public).

Instead of a detailed study of constraints as required by the PPG, the Regulation 18 “Garden Villages” consultation document repeats what the sites’ promoters have said about infrastructure provision with an important disclaimer that (ed: emphasis added):

“it should be noted that these are not commitments, and are included for indicative purposes...”

This disclaimer also contradicts the Council’s 2016 Regulation 18 documents and its press statements about the garden village because it demonstrates that the Council has carried out no proper assessment work.

The Interim Focused Housing and Economic Land Availability Assessment – Broad Locations August 2017 indicates that the Council has relied solely on developers’ statements about the broad areas rather than carrying out the assessments required by the NPPF or any independent studies of its own.

This continues to be a wholly inadequate way to conduct the Local Plan process especially in light of Council press releases that promise new infrastructure as part of this “infrastructure-led” Local Plan.

Previous Regulation 18 Consultation Responses

Paragraph 1.20 of the 2017 consultation document states that community views in response to the previous two consultations have been taken into account when agreeing the Preferred Strategy.

However, the previous Regulation 18 consultation responses that the Council has published thus far demonstrate that there is no public support for the Approaches that make up the Preferred Strategy. To date, the Council has published its response to the 2015 Regulation 18 Consultation, "Issues and Approaches" and has given some information about the response to the 2016 Regulation 18 Sites Consultation in the Planning Policy Committee papers dated 27 June 2017.

In the responses to the 2015 Regulation 18 Issues and Approaches Consultation, Approach 3 was wholeheartedly rejected by communities throughout Tandridge District. The Preferred Strategy itself states at Paragraph 5.13:

"These approaches (ed: which include Approach 3) were unpopular when consulted on because they would require the amendment to the Green Belt boundary and it was felt they would place unacceptable strain on infrastructure, particularly roads, doctors and schools and would impact on flooding.."

In the Issues and Approaches Consultation documents, the "urban extension or new settlement" -- called Approach 6 -- was a vague and unspecified concept as shown by the following paragraphs:

11.7.1 Description of Approach: A large urban extension or new settlement (11)

11.7.2 There is no map or housing numbers associated with this approach. A new settlement or large urban extension could be located anywhere within the district and we want to gain your views on the concept of providing a new settlement or a large urban extension.

This lack of detail was in contrast to Approaches 2A - 5 which included specific areas and amounts of development.

The Council's footnote (11) for Approach 6 said "This approach is known as a 'broad location' in the NPPF." This is incorrect because the NPPF/PPG explains that a "broad location" means identifying actual sites with a realistic potential for development rather than stating, as Tandridge District Council did, that the large urban extension or new settlement could be located "anywhere."

The Council's 2016 Regulation 18 Sites Consultation included very sparse information about the Blindley Heath and South Godstone locations and no information at all about the other two proposed locations. The content of the few pages that form Part 2 "New and Extended Settlement Options" is very basic, imprecise, and uninformative.

The 2015 Consultation responses show little support for Approach 6 and, importantly, also show that the vagueness of the wording and lack of content meant many respondents were unable to comment properly or chose not to comment, and so little weight should be given to any responses or Council interpretation of the responses.

The Preferred Strategy accepts this, stating in Paragraph 5.28:

Although a new or extended settlement was not universally considered to be an appropriate approach during consultation, many wished to see more detail so they could make more informed judgements.

Paragraph 5.32 goes on to say that:

The analysis of the responses to the 2016 Sites Consultation is still being carried out but a number of concerns surrounding this approach have been raised including: the inability of such a scheme to cater for short-term development needs; concerns about the ability to accommodate such a concept within the district without a significant impact on infrastructure and the inability to mitigate the harmful impacts to the Green Belt and the environment.

One year later, the 2017 consultation document contains no further details and these concerns remain unaddressed.

Despite the clear messages given by residents in the 2015 and 2016 consultations, the Council has ignored the responses and is persisting with a Strategy that is not representative of what the community wants, is not supported by its own Local Plan evidence base, and is not compliant with the NPPF.

Paragraph 1.23. The Preferred Strategy does not serve to protect the distinctive nature of the District nor to limit Green Belt release. Clearly, it cannot do so because it proposes releasing large amounts of Green Belt, the majority of which is for inflated levels of inward migration into the District.

Paragraph 1.24. The statement that the Council has been transparent in its plan-making is incorrect. It has not been transparent with the public and there has been a repeated pattern of misdirection of the public. (see Section 10 of this submission for details).

The Preferred Strategy has never been put out for public consultation, and the Council's published documents show that there is, in fact, almost no public support for Approaches 3 and 6 which comprise it. Therefore, it cannot be demonstrated that the Preferred Strategy has any public support as required by Paragraph 69 of the NPPF.

10.0 Engagement with the Public

The Council has an obligation to correctly inform the public and to be factual and consistent in all public communications. We have included this section because of the level of repeated misdirection of the public by Council published documents and press releases throughout the Local Plan process which is such as to materially affect the integrity of the public consultation exercises.

The first two Regulation 18 documents consistently misrepresented the position over objectively assessed need. For this third Regulation 18 consultation, there has been, and remains, a significant difference between what the Council has told the public in its

press statements and publicity and what is actually contained in its evidence documents, the Preferred Strategy, and the NPPF.

We include the following examples:

2015 Regulation 18 Consultation

The first Regulation 18 Consultation “Issues and Approaches” main consultation document which, in paragraph 11.0.1 (Item 1, Appendix 2), omitted the part of the definition of sustainable development set out in Paragraph 14 of the NPPF which states that local authorities should meet their full objectively assessed needs **unless specific policies in the Framework, including the Green Belt, indicate development should be restricted.**

This led members of the public (who are not planning experts) to believe that the Council had no choice but to meet the OAN in full, irrespective of the Green Belt, or any other constraints, when that is not the case.

2016 Regulation 18 Sites Consultation

This omission was repeated in Paragraph 1.7 of the 2016 Regulation Sites Consultation where the definition of sustainable development was once again misrepresented. This was repeated despite assurances from the Council, including in its Statement of Consultation Response, that the omission would be corrected. (Item 2, Appendix 2).

Once again, members of the public were led to believe that the Council had no choice but to meet the OAN in full when that is not the case.

Both OLRG’s representation to the Issues and Approaches Regulation 18 Consultation and its representation to the Sites Consultation highlighted the fundamental misdirection of the public about the OAN and the NPPF that had taken place.

Summer 2017 edition of the Tandridge Quarterly magazine

The Council publishes a quarterly magazine “Tandridge” which is delivered to all households in the District. An article in its Summer 2017 edition (Item 3, Appendix 2), entitled “Garden Village consultation” and delivered prior to the start of this consultation states (ed: emphasis added):

Earlier this year, the Council agreed the preferred strategy for its delivery of homes we are required by the government to provide.”

This misdirects the public by implying that the Council has been told by the Government to meet the full OAN figure when that is not the case.

In addition, the Council fails to mention Approach 3 in its description of the Preferred Strategy. The statements that the Preferred Strategy will prevent “a scattergun approach to development” and will also prevent the risk of over development are misleading as Approach 3 will result in both as explained in Section 9.

Local Plan Garden Villages Consultation – Get the Facts leaflet, August 2017

On 9 August 2017, the Council published a “Local Plan Garden Villages Consultation – Get the Facts” leaflet (Item 4, Appendix 2). This contained the statement:

The largest part of the population increase, around 70%, is because people are living longer.”

This is incorrect because net inward migration is the main driver of the projected population increase. It is also incorrect because the age profile is an attribute or characteristic of a population and not a component of population change. The drivers of population change are natural change and migration.

This incorrect assertion was previously published by the Council and then corrected as explained in para 2.2 “Age structure of the population” of Appendix 1 of OLRG’s Sites Consultation response. As explained in this document, we believed that the Council had understood the error and as a consequence had corrected it on the website, but this mistake has been repeated in this leaflet and so has misled the public regarding what the actual drivers are of the projected population change.

The leaflet also states the Council’s proposals will

“... help us to preserve the open and green character of our district which is one of our priorities and will prevent a scattergun approach to development.”

The leaflet also fails to mention Approach 3 which will focus development in the first 10 years of the Plan in and around existing Tier 1 and Tier 2 settlements which are scattered around the District. This will lead to the very scattergun development it claims to be preventing.

Press Release, 17 March 2017

On 17 March 2017, the Council issued a press release (Item 5, Appendix 2) about its Preferred Strategy. Yet again, this makes no mention of Approach 3 and is misleading to the public, in particular its title “*Local Plan Strategy which aims to protect the Green Belt*” and also this statement (ed: emphasis added):

We now have a clear strategy which will be reflected in the development of a Local Plan that is infrastructure led and which relieves the pressure on existing facilities. Releasing a small amount of the Green Belt will enable us to deliver the infrastructure we so badly need, while protecting the rest from incremental development.

As explained earlier, the Preferred Strategy makes no such commitments to the delivery of infrastructure to address existing deficits. In fact, it states the opposite - that there are no “quick fixes” for existing deficits and that any future infrastructure delivery remains a “significant challenge.” The press statement is a commitment to delivery while the contents of the Preferred Strategy are not.

Wraparound advertisement, 22 March 2017

On 22 March 2017, the Council spent £1400 on a wraparound advertisement in the local newspaper which once more failed to mention Approach 3 and once more was misleading with regard to future infrastructure provision and protection of the Green Belt (Item 6, Appendix 2).

These are just some of the differences between what the Council has told the public in its press releases and associated publicity and what is actually contained in the NPPF, the Preferred Strategy and the evidence documents. The Council has an obligation to correctly inform the public and to be factual and consistent in all public communications. The level of repeated and substantive misdirection of the public by the Council, throughout the process, is such as to materially affect the integrity of the public consultation exercise.

11.0 Conclusion

The emerging Local Plan Preferred Strategy and the garden villages consultation are fundamentally misconceived and contrary to the NPPF.

Travel to work patterns and the existing dominance of the car for access to employment, services and infrastructure have been ignored from the very start despite evidence being available in 2015 showing the adverse traffic impacts from Approach 3, which is now a pillar of the Preferred Strategy.

The very limited services and infrastructure in this predominantly rural District and the consequent reliance on other districts has not been reflected in the foundation documents. The Settlement Hierarchy overstates the employment, services and infrastructure available in the individual settlements. As a result, the sustainability of the settlements has been overstated and the reliance on other areas has been understated. The Duty to Cooperate discussions have not taken this reliance into account and so have been incorrect from the very start.

This flawed baseline means that the direction of the Local Plan was not compliant with the sustainable development objectives of the NPPF from the very start. What has followed since then continues to be fundamentally flawed, not justified, not supported by evidence and so not a sound basis for preparing a Local Plan.

More than 90% of the projected population increase is due to artificially high projected future levels of net inward migration.

The Garden Village proposal fails to follow the Government's key principles set out in the 2016 Prospectus "Locally-Led Garden Villages, Towns and Cities." It is not being built to meet local housing need and it will not be self-sustaining.

The Preferred Strategy exacerbates unsustainable travel patterns and so the Preferred Strategy will have a profoundly negative impact on the local environment, local communities, and other protected areas.

There is no community benefit from the Preferred Strategy and the garden village. Instead, the 2017 support documents and this consultation response highlight significant adverse impacts on local communities and the environment - both within and beyond Tandridge - arising from the Preferred Strategy and the garden village.

The Preferred Strategy does not reflect the distinctive characteristics of Tandridge nor does it reflect the needs and priorities of local residents. The Strategy does not take into account the responses to the Council's previous consultations, is not supported by the evidence base, is not compliant with national planning policy and is not representative of what the community wants.

For all these reasons, we conclude that the Preferred Strategy is not justified, not supported by evidence and contrary to the NPPF.

9 October 2017

Appendix 1



Edenbridge Town Council

Town Clerk: Christine Lane CertHE Local Policy



Piers Mason
Head of Planning
Tandridge District Council
8 Station Road East
Oxted
Surrey RH8 0BT

26 September 2017

File: Planning/Tandridge Local Plan

Dear Piers

Edenbridge Town Council Response to Tandridge Local Plan – Garden Village Consultation

It is disappointing that Edenbridge Town Council has still not received a response to its letter dated 1 June, offering you the opportunity to come and make a short presentation on the Tandridge Local Plan to council members, and requesting that the residents of Edenbridge be treated in the same manner as residents of Tandridge during any future consultation process. Since that date, the Tandridge Garden Village Consultation has been launched which contains details of a cross border Garden Village attached to the built area of Edenbridge. None of the five drop-in sessions have taken place in Edenbridge nor have they been widely publicised here.

The Council can only assume that the lack of response on Tandridge's part is due to the shortcomings of the proposal which make it extremely unlikely to meet the required criteria for it to progress. Edenbridge Town Council requests that it be removed immediately from the options documents on the following grounds.

NPPF 7 states there are three dimensions to sustainable development: an economic role, a social role and an environmental role.

Economic role NPPF 7 requires contribution to strong, responsive and competitive economy, together with identification and coordination of development requirements, including the provision of infrastructure. **The TDC proposal was silent on all of these features.** To support the increase in size of Edenbridge envisaged there would need to be:

- Increased employment opportunities;
- Significantly improved road infrastructure;
- Significantly improved rail service with disabled access to all platforms at both stations and adequate parking at stations;
- Increased sewerage treatment capacity.

Sevenoaks District Council has stated that the proposal is not in line with its emerging issues and options consultation draft and, as such, it would be highly unlikely to be a site that was included in the SDC draft Local Plan, making it unviable. It is also contrary to the emerging Edenbridge Neighbourhood Plan.

Council offices: Doggetts Barn, 72A High Street, Edenbridge, Kent TN8 5AR
Office hours: Monday – Friday 9.00am – 5.00pm **Tel:** (01732) 865368 **Fax:** (01732) 866749
Email: townclerk@edenbridgetowncouncil.gov.uk **Web:** www.edenbridgetc.kentparishes.gov.uk

Social role NPPF 7 requires a high quality built environment with accessible local services that reflect the community's needs and support its health, social and cultural well-being. **The TDC proposal assumed**

there were adequate facilities within the existing town of Edenbridge and only suggested additional primary and secondary schools. No mention was made of:

- Social impact on existing community and how a relatively very large influx of incomers could be integrated into it;
- Provision of social services;
- Provision of health and related services;
- Loss of community amenity (golf course);
- Access from new development to services in town centre.

The burden of providing services would largely fall on Sevenoaks District which could result in a challenge to move the boundary, resulting in no benefit to Tandridge District. The proposal would require significant investment and improvement.

Environmental role NPPF 7 requires contribution to protecting and enhancing our natural, built and historic environment. **The TDC proposal was silent on these features.** The proposal will lead to:

- Loss of green belt land to build the homes;
- Loss of more green belt land if better roads, sewerage treatment, etc, facilities are provided;
- Increased flood risk arising from storm water run-off.

No mention was made of improving biodiversity, protecting and enhancing valued landscapes or moving to a low carbon economy, all of which are key parts of NPPF.

The proposal is totally against all the definitions of the Green Belt, which include the intention to prevent the merging of communities.

There would be a significant and permanent negative impact on the landscape character and views from High Weald AONB, and a significant and permanent negative impact on the landscape character of the Low Weald AONB, in addition to the visual impacts on the landscape to the West of Edenbridge.

The proposal appears to have underestimated the severity of the historic flood events from surface water flooding and overestimated its ability to mitigate it.

The Tandridge DC proposal is not a garden village/town, but an urban extension of Edenbridge. Without significant investment in a wide range of infrastructure and public services, the proposed development would, without doubt, worsen all aspects of social, economic and community life for the existing population of Edenbridge. It is ill conceived and undeliverable, and would not contribute to the wider sustainability and betterment of the residents of Tandridge District. On all the above grounds Edenbridge Town Council repeats its request that it be immediately removed from the options documents.

Yours sincerely



Christine Lane
Town Clerk

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Appendix 2: Engagement with the Public

1. 2015 Regulation 18 Issues and Approaches Consultation document.

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11 The people

11.0.1 Chapter 6 of the National Planning Policy Framework (NPPF) requires local planning authorities to meet their full objectively assessed needs and to identify and cater for those housing and economic needs. Chapter 1 of the NPPF also stipulates the need for local planning authorities to build a strong and competitive economy. In order to do this, there is a legal requirement for local planning authorities to consider all reasonable alternatives on how to deliver this need. Consequently, the Council has identified 7⁽¹⁾ approaches to the delivery strategy, all of which provide a different number of homes and jobs, but not all approaches meet the objectively assessed housing need of 9,400 dwellings across the 20 year plan period (2013-2033) as set out in the Objectively Assessed Need Paper and the employment net demand of up to 14,522 sqm of B1 (office space) and -7.9ha of B2/B8 (industrial/warehousing) determined in the Economic Needs Assessment⁽²⁾

11.0.2 In order to determine the 7 approaches and identify where development should be distributed, the following settlement hierarchy has been used.

Settlement Hierarchy

Tier	Name	Settlements
1	Urban Settlements	Caterham on the Hill, Caterham Valley, Hurst Green, Limpsfield, Oxted, Warlingham and Whyteleafe.
2	Semi-Rural Service Settlements	Godstone, Lingfield and Smallfield.
3	Rural Settlements	Bletchingley, Blindley Heath, Dormansland, Felbridge, Old Oxted, South Godstone, South Nutfield, Tatsfield and Woldingham.
4	Limited and Unserviced Settlements	All other settlements.

¹ Approach 1 is the current, baseline situation and therefore not a realistic approach to future delivery.
² It should be noted that in respect of commercial land, whilst there is a decrease of B2/B8 and increase of B1, the Economic Needs Assessment makes it clear this can be met through the intensification of use on existing employment sites throughout the whole district and not through new allocations.

2. 2016 Statement of Consultation assurance and repeated incorrect paraphrasing of Paragraph 14 of the NPPF.

COUNCIL'S STATEMENT OF CONSULTATION - REC 18 ISSUES AND APPROACHES

		demographic considerations, but doesn't necessarily represent the number of homes that the Council will actually provide.		
3432	The Council's OAN has no credibility unless it can put forward an integrated strategy for solving this.	The OAN is a number that has to be identified. The Council then do need a strategy to seek to address it. If a lesser amount is all that can be addressed the reasons for this need to be robustly evidenced	None	619
1368, 1527, 1900, 2041, 2051, 2232, 2557, 2603, 2605, 2607, 2609, 2994, 3003, 3014, 3132, 3168, 3258, 3280, 3335, 3915, 4336, 4483, 4500, 4629, 4614, 4622, 4701, 4759, 4792, 4801, 4814, 5040	Paragraph 11.0.1 on page 31 of the I&A document omits reference to the clause in NPPF paragraphs 14 and 47 which specifies that housing need should be met "unless specific policies in this Framework indicate development should be restricted". Those specific policies include the Green Belt. Residents have been fundamentally misled by this omission.	It is agreed that the full sentence from the National Planning Policy Framework states: "To significantly boost the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period." It is agreed that whilst the text on page 30 makes it clear that there are other factors that need to	The Council will ensure that where appropriate, the Local Plan will clearly acknowledge that whilst the Government expects the full OAN to be met this can only be achieved provided the method for doing so is consistent with the other policies in the Framework.	620

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1 The context

Our Local Plan

1.1 Tandridge District Council is preparing a Local Plan which will set out a new development strategy for the district up to 2033.

1.2 A Local Plan provides the opportunity for the district to build on its existing strengths while also addressing identified challenges by guiding the delivery of homes, providing for employment and setting policies which enhance the natural and historic environment. To achieve this, the Local Plan will allocate sites for housing, employment and open spaces and set out policies to be used in the assessment of planning applications.

1.3 The Council's current planning policies are set out in the Tandridge District Core Strategy (2008) and the Detailed Policies (2014). Once adopted, the Local Plan will replace the Core Strategy (2008).

1.4 A crucial stage in the creation of the Local Plan is the opportunity for residents and other people with an interest in the district to have their say on the Plan through consultation. This enables the Council to consider the views of the community, stakeholders and all interested parties, in the preparation of a Local Plan while balancing it with local evidence.

1.5 The Council undertook the first stage of formal consultation between December 2015 and February 2016. This Local Plan Sites Consultation document, is the second opportunity to comment on the Plan and what it should include. This consultation is being carried out in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 between 4 November 2016 and 30 December 2016.

Why is the Local Plan being prepared?

1.6 The starting point for the preparation of the Local Plan is government policy and legislation and a plan must conform with these first and foremost. The main thrust of national policy is to ensure that sustainable development is achieved across the country and that each Local Authority plays its part in increasing the supply of housing¹.

1.7 The key message which runs through the heart of the NPPF is the presumption in favour of sustainable development and Local Plans are the key to delivering this. The NPPF explains that Local Plans should meet objectively assessed needs (including housing and employment) unless there are any adverse impacts that significantly and demonstrably outweigh the benefits.

1.8 Sustainable development balances economic, social and environmental considerations, as much as is practicably possible, while determining how best to provide the homes, jobs and infrastructure which are needed. This Sites Consultation sets out how the Council is considering each of these elements and impacts, as we seek to identify if, how and where, we can meet the objectively assessed needs highlighted through the undertaking of a [Strategic Housing Market Assessment](#) and [Economic Needs Assessment](#).

1.9 The government, through the National Planning Policy Framework (NPPF), recommends each local planning authority should produce a Local Plan for its area. The Council recognises the benefits of preparing an up to date Local Plan as the opportunity to retain control over planning in the district, ensuring the right development is provided in the right locations and supported by the right infrastructure.

1.10 Tandridge district is predominantly rural, with high quality landscapes and rich heritage and is justifiably valued for these qualities, making it a desirable place to live. It is also a district with a growing population, shrinking household sizes and an ageing demographic - all of which impact on the supply and availability of homes. This in turn is driving house and land prices to extreme levels.

¹ [National Planning Policy Framework](#) (2012) Paragraph 47

3. Summer 2017 edition of the Tandridge Quarterly magazine.

Garden Village consultation

In August, we will launch a six week consultation on the five potential locations being considered for a garden village development, as part of the Local Plan making process.

The five locations being considered are:

- Blindley Heath
- Chaldon Land at Alderstead and Tollsworth Farm
- Edenbridge, Land west of Edenbridge
- Redhill Aerodrome
- South Godstone

Earlier this year, the Council agreed a preferred strategy for the delivery of homes we are required by the government to provide. We are pursuing the development of a new settlement, created around garden village principals.

This approach has a number of advantages. Not only will it enable the delivery of proper infrastructure to support homes in the district, including schools, a doctor's surgery, supermarket and investment in roads, it also means we can prevent a scattergun

approach to development.

The district is currently 94% Green Belt and development has been concentrated within the remaining 6%. These areas are now at risk of over development. We are committed to protecting the Green Belt and only amending the Green Belt boundary in locations where its purposes are not served, where community benefit is evident and where exceptional circumstances are demonstrated.

Three of the five locations being considered for a garden village have not yet been formally consulted upon. Detailed analysis of the 4,700 comments submitted during the Local Plan: Sites Consultation is ongoing.

More information on the Local Plan: Garden Village Consultation will be available soon.

Tandridge Magazine Summer 2017

4. Local Plan Garden Villages Consultation – Get the Facts” leaflet, 9 August 2017.

Local Plan

Garden Villages Consultation



14 August to 9 October

Get the facts

What is a garden village?

A garden village is a holistically planned new settlement which offers high quality affordable housing and locally accessible work in healthy and sociable communities. It will enable us to build well designed homes which our young people and average earners can afford to live in.

What is the Garden Villages Consultation?

The Council's agreed preferred strategy for the Local Plan includes the identification and delivery of a garden village. In this consultation we have set out a draft vision and the principles and objectives a garden village should meet. In addition, this consultation has looked at the four potential locations for a garden village.

- Blindley Heath
- Edenbridge, Land west of Edenbridge
- Redhill Aerodrome
- South Godstone

Two of the four locations straddle the boundaries of neighbouring authorities. How will this work?

Redhill Aerodrome and Land west of Edenbridge each straddle the boundaries of neighbouring authorities. These locations have also been submitted to the Local Plan processes of the relevant neighbouring authorities for their respective consideration and we will be working with our neighbours to consider these.

What infrastructure will be put in place to support the new homes?

The consultation document has set out a number of infrastructure requirements the four potential locations would have to provide based on information available at this time. As a minimum this has to include improvements to the road network, public transport and school and health facilities, which will support not just the garden village itself but existing residents. Without guarantees we will not allow development to go ahead.

A garden village is a once in a generation opportunity to deliver:

- Affordable homes
- New primary and secondary schools
- Health care facilities
- Road and highways improvements
- Local facilities
- New open space and recreation
- Green infrastructure

Why has the Council looked at the Green Belt?

The district is 94% Green Belt and we will only need to release around 1% to develop a garden village. We have the highest proportion of Green Belt of any district or borough in the country and by releasing this small amount, we still will. This will help us to preserve the open and green character of our district which is one of our priorities and will prevent a scattergun approach to development.

How will the Council decide on the best location for a garden village?

Importantly, your comments are part of the evidence gathering and at each stage of the consultation are carefully analysed and used in the creation of our Local Plan.

The Council is also producing robust evidence about the Green Belt, the landscape, the ecology, flooding, infrastructure and sustainability. By considering all this information together in the final plan the Council will be setting a realistic, achievable and robust housing delivery target.

Who will benefit from the new homes?

The largest part of the population increase, around 70%, is because people are living longer. This reduces the availability of housing in the market. This is one of the reasons why housing in this area is so expensive and therefore unaffordable for many people. In order to buy an average house with a mortgage in the district, you currently need to earn more than £105,000 per annum.

What if we do nothing?

Unless we submit a Local Plan which stands up to the scrutiny of the government inspectors, where houses are built and how many will be driven by developers and decided at appeal. Creating a robust Local Plan together will give us the greatest control over development.

How can I keep up to date and have my say?

Please visit one of our five exhibition events:

Venue	Date	Time
Nutfield Village Hall, Mid Street, South Nutfield RH1 4JJ	Tuesday 22 August	3.30pm to 8pm
Douglas Brunton Centre, 25 Chaldon Road, Caterham CR3 5PG	Wednesday 30 August	3.30pm to 8pm
South Godstone Sports and Community Association Hall, The Pavilion, Lagham Road, South Godstone RH9 8HN	Tuesday 5 September	3.30pm to 8pm
Lingfield Primary School, Vicarage Road, Lingfield RH7 6HA	Friday 8 September	3.30pm to 8pm
St John's Church Hall, Eastbourne Road, Blindley Heath RH7 6JR	Thursday 14 September	3.30pm to 7.30pm

Additionally, anyone can make comments by:

- Visiting our consultation portal at <http://consult.tandridge.gov.uk/portal>.
- E-mailing us at localplan@tandridge.gov.uk.
- Writing to us at Tandridge District Council, 8 Station Road East, Oxted, Surrey RH8 0BT.

What happens next?

Results from this consultation will be analysed and used to prepare the draft Local Plan which we will consult on again, prior to it being submitted for examination.



We want to create a community led development where people are proud to live, work and visit.

www.tandridge.gov.uk/localplan



5. Press Release, 17 March 2017



17 March 2017 (GV.0703)

(1/1)

Local Plan Strategy which aims to protect Green Belt agreed

Last night's Planning Policy Committee agreed the strategy, which sets out the Council's strategic approach to development for the district up to 2033.

This supports the proposal for a garden village, as part of the creation of the Local Plan, which would require the release of around 1% of Green Belt land. The strategy proposes a new settlement of around 4000 houses, developed around garden village principals, will be pursued as part of the Local Plan. This aim is to provide a mix of affordable and starter homes and would include new schools, a doctor's surgery, supermarket and investment in roads.

At this stage, the strategy does not set out in detail exactly where new development will take place, but sets out the principles on which decisions will be based.

Five sites will be further considered as the plan moves forward. These sites have been submitted to the Council by landowners and developers. These are on land in Blindley Heath, Chaldon - Alderstead and Tolsworth Farm, land west of Edenbridge. Redhill Aerodrome and South Godstone. Once locations which can be developed have been identified, further consultation will take place to ensure the final Local Plan caters for present and future needs.

Without looking at the Green Belt, the Council will only be able to deliver just over a third of the housing needed. This approach would not boost the supply of housing as required by the government and would not pass the independent examination of the Local Plan, which could mean the Council losing the ability to control and plan for development in the district, putting more Green Belt at risk.

Councillor Peter Bond, Chairman of the Planning Policy Committee, said: "We now have a clear strategy which will be reflected in the development of a Local Plan that is infrastructure led and which relieves the pressure on existing facilities. Releasing a small amount of the Green Belt will enable us to deliver the infrastructure we so badly need, while protecting the rest from incremental development."

"Ends"

6. Council's wraparound advertisement in the County Border News, 22 March 2017

Creating a Local Plan to meet future needs

We have just agreed the strategy which will guide the Council's approach to development for the district up to 2033. The Local Plan is the opportunity to set out how this can realistically be achieved and set down the standards developers will need to follow.

The strategy, which proposes a new settlement of around 4000 houses, developed around garden village principals, will be pursued as part of the Local Plan. This aim is to provide a mix of affordable and starter homes and would include new schools, a doctor's surgery, supermarket and investment in roads. We need to have a Local Plan that is infrastructure led and which relieves the pressure on existing facilities.

This approach would require the release of around 1% of Green Belt land. Releasing a small amount of the Green Belt will enable us to protect the rest and allow development to meet future needs. Otherwise we are in danger of an increasingly elderly population living alone in large houses, which means there are no houses for young families and future generations, or for those who want to downsize. This also has an adverse impact on the local economy.

Balancing these competing needs is not easy. We have worked hard to set out a strategy which will ensure the district is a viable and vibrant place to live, work and visit.

Without looking at the Green Belt, the Council will only be able to deliver just over a third of the housing needed. This approach would not boost the supply of housing as required by the government and would not pass the independent examination of the Local Plan, which could mean the Council losing the ability to control and plan for development in the district, putting more Green Belt at risk.

At the moment five sites will need to be further considered as possible sites for a garden village as the plan moves forward. These sites have been submitted to the Council by landowners and developers. These are on land in Blindley Heath, Chaldon - Alderstead and Tolsworth Farm, land west of Edenbridge, Redhill Aerodrome and South Godstone.

At this stage, the strategy does not set out in detail exactly where new development will take place, but sets out the principles on which decisions will be based. Once locations which can be developed have been identified, further consultation will take place to ensure the final Local Plan caters for present and future needs.

