Oxted & Limpsfield Residents Group

Representation to the Tandridge District Council Local Plan Issues and Approaches Regulation 18 Consultation.

1.0 Introduction

This representation is made by the Oxted & Limpsfield Residents Group (OLRG) and is in addition to the Collective Regulation 18 representation. It is in two parts: Part One deals with the technical evidence in relation to Oxted and its surrounds, Part Two deals with procedural deficiencies in the Local Plan consultation.

1.1 OLRG is a formally constituted residents’ association which has more than 2,400 members and proactively engages in planning matters affecting the local community. Although the bulk of its members are from Oxted, Limpsfield and Hurst Green it also has members from across Tandridge. It is a member of the National Organisation of Residents’ Association.

1.2. OLRG is an active participant in the local planning process, including:

- Preparing evidence for and participating in the hearings for the Tandridge District Council Core Strategy in 2008.
- Membership of the Tandridge District Council SHLAA panel in 2011.
- Being represented by Paul Brown, QC as joint Rule 6(6) parties with the Caterham on the Hill and Woldingham Parish Councils at the Whyteleafe Road, Caterham Public Inquiry where the questions of whether the Core Strategy was “up to date” and objectively assessed needs in Tandridge were debated. Under cross-examination, the appellant’s expert witness agreed with many of the flaws in their OAN evidence identified by both the Tandridge Council barrister and the Rule 6(6) QC. The Core Strategy was also not declared out of date. Similar flaws are present in the OAN now put forward in the Local Plan documents.
- Submitting detailed and in many cases professionally prepared responses to all of the consultations that have so far taken place with regard to Tandridge District Council’s new Local Plan.

Part One

This addresses:

- the inaccurate portrayal of Oxted in a number of the Local Plan documents and the inconsistencies between these documents and others in the evidence base.

- the unjustified and unexplained change in the Council’s approach to the OAN.
• the deficiencies in the infrastructure documents.

• the inappropriate inclusion of sites in the HELAA as “deliverable and developable.”

• the importance of maintaining the local Green Belt designation to assist redevelopment of key brownfield sites such as the redundant Oxted gasholder.

2.0 The inaccurate portrayal of Oxted in a number of the Local Plan documents and the inconsistencies between these documents and others in the evidence base.

2.1 In the Settlement Hierarchy, Oxted is ranked at number one. This ranking is based on a flawed methodology. One example of the flaws in the methodology is that chemists, GP surgeries and hospitals are classed together as “health provision”. This leads Oxted to have an unjustified score of 5.

A chemist cannot be considered equivalent “health provision” to either a GP surgery or a hospital. The Infrastructure baseline study Part 1, Chapter 6: Health Map shows Oxted having a single GP surgery compared to other areas which are shown to have several GP surgeries together with a community hospital. There is no hospital in Oxted. The consequence of grouping chemists together with GPs in the scoring system is that Oxted appears to be better served with health provision than it actually is.

2.2 The descriptions of Oxted in the Settlement Hierarchy consistently and incorrectly portray Oxted as a large town equivalent to much larger out-of-district centres which conflicts with the evidence base. The consequence of this is that Oxted is portrayed as having more shops, services, employment and infrastructure than it actually has and this leads to incorrect and unjustified conclusions regarding its suitability as a location for sustainable development – both absolutely and relative to other areas.

2.3 A further indication of the misrepresentation of Oxted is shown by the population figures. Table 4 of the Settlement Hierarchy shows the population of Oxted is only 5,200 and so ranked 5th among the settlements of Tandridge.

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Population (Highest – Lowest)</th>
<th>Initial Ranking (Stage 3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caterham on the Hill</td>
<td>12,750</td>
<td>2</td>
</tr>
<tr>
<td>Warlingham</td>
<td>8,650</td>
<td>2</td>
</tr>
<tr>
<td>Caterham Valley</td>
<td>8,350</td>
<td>2</td>
</tr>
<tr>
<td>Hurst Green</td>
<td>6,150</td>
<td>6</td>
</tr>
<tr>
<td>Oxted</td>
<td>5,200</td>
<td>1</td>
</tr>
</tbody>
</table>

2.4 Table 2.1 in the Retail and Leisure Study 2015 shows the Venuescores which include only two settlements in Tandridge, with Caterham Valley at position 548 with a Venuescore of 49
and Oxted at position 1,322 with a Venuescore of only 20. Table 2.2 of the Retail and Leisure Study shows that Caterham Valley has more Class A shops, Convenience Goods and Comparison Goods floorspace than Oxted. Therefore, Oxted having the top ranking further conflicts with the evidence base.

2.5 Descriptions of Oxted included in the Settlement Hierarchy and in other documents conflict with the evidence base because they equate Oxted (population 5,200) with Crawley (population 106,597), Redhill (population 30,289), East Grinstead (population 26,523) and Sevenoaks (population 24,987).

Some examples:

- Para 6.10 “Oxted and Caterham both score highly, reflecting the large scale services and facilities located there....”

This conflicts with the Retail and Leisure Study as explained above.

- Para 7.13 “Although other settlements in the district are also located on the SRN, each of the three settlements in question also benefit from the nearness of other larger urban areas including Redhill, Oxted and East Grinstead which further buoys the provision of local services and helps to keep them viable for the longer term.”
Redhill and East Grinstead are both far larger towns than Oxted. East Grinstead has a population of 26,523 and Table 2.1 of the Retail and Leisure Study shows it has a rank of 265 and a Venuescore of 89.

- Para 7.65 “In fact, only Oxted and the Caterham areas come close to competing with the level provision of places like Crawley and Redhill...”

There is no comparison with Crawley and Redhill which have significantly larger populations with long-standing economic centres that include far more extensive facilities than either Oxted or Caterham. Paragraph 7.65 also conflicts with the Retail and Leisure Study where Table 2.1 (Venuescore) shows Crawley ranked 70 with a Venuescore of 200 and Redhill ranked 241 with a Venuescore of 97. The difference is captured visually in Figure 2.1 of the Retail and Leisure Study which shows how small the dot for Oxted is compared to Redhill, East Grinstead, Crawley and Sevenoaks.
2.6 This disparity between Oxted and such other centres is made clear in paragraph 3.90 of the Retail and Leisure Study which states: “All centres in Tandridge District are much smaller than larger centres surrounding the District, in particular Redhill, East Grinstead, Crawley, Sevenoaks and Croydon, which are accessible to residents within the District and have a more extensive range of multiple retailers.”

2.7 Paragraph 5.39 of the Retail and Leisure Study states: “Within Oxted town centre, development options appear to be limited, particularly in the short term. The development potential of the town centre is constrained by its historic environment, street layout and neighbouring residential areas.”

It is clear from the evidence base that many people regularly shop outside Tandridge, at much larger centres such as Croydon, Crawley and Bluewater, and this is likely to remain the case in future especially as some, such as Croydon and Redhill, are engaged in a major multi-million pound expansion of their shopping and business facilities. Competing provision in nearby centres will further constrain provision in Tandridge.

2.8 The use of the word “urban” is imprecise and misleading. This can be seen in paragraph 7.31 under the title “Urban Settlements.” In this paragraph we are told both that Oxted is not considered urban but then is considered “urban in the local context.” This seems a nonsensical statement. Para 7.31 should be deleted.

- Para 7.31 Although none of the settlements in the district can be considered urban when compared against those such as Croydon or Redhill, Tandridge does have settlements which are large enough and sufficiently developed to be considered urban in the local context. The built character and development pattern of these settlements contributes to their urban nature which distinguishes them from other settlements in the district.

2.9 The Spatial Approaches Topic Paper 2015 describes Oxted as a “conurbation” in numerous places - some examples below - which is completely at odds with the rest of the evidence base which makes clear the limited size and scale of services that are available in Oxted:

- Para 3.2.1 “Eighteen land areas have been identified. These have been established by placing a simple grid over the District and making adjustments to ensure that the conurbations are contained within a single area as far as is possible.”

- Page 30, table 4: The main urban conurbation of Oxted (including Limpsfield and Hurst Green).

- Page 72: “To the eastern side of the conurbation Limpsfield Common and Grubstreet Copse sit between Limpsfield and Limpsfield Chart…” and “……are identified in the southern areas of the main built conurbation with Bushey Croft located in Old Oxted.

- Page 83: “The majority of the area is considered grade 3, however, the conurbation of Oxted is classified as Urban.”
The definition of the word “conurbation” is “an extended urban area, typically consisting of several towns merging with the suburbs of a central city.”

Copied below is the Oxted town centre map included in Appendix 1 of the retail study. It shows the small size and scale of Oxted town centre and how it is unreasonable and a misnomer to describe Oxted as a “conurbation.”

2.10 The ranking of Oxted at the top of the settlement hierarchy is misconceived and conflicts with the evidence base. When the evidence base is used and the flaws in the settlement ranking methodology are corrected, it becomes clear that Oxted has far more limited service provision than that implied in the Settlement Hierarchy and Spatial Approaches Topics Paper.

3. The unjustified and unexplained change in the Council’s approach to the OAN.

3.1 Paragraph 63 of the Collective Regulation 18 representation makes reference to the 2014 Whyteleafe Road, Caterham, Public Inquiry (Appeals Ref: APP/M3645/A/13/2209654 & APP/M3645/A/13/2209687) at which the appellant attempted to overturn the current Core Strategy. OLRG, Caterham on the Hill Parish Council and Woldingham Parish Council (with the support of other groups) combined as joint Rule 6(6) parties to successfully
challenge the appellant’s evidence on objectively assessed needs in Tandridge District. The Rule 6(6) parties were represented by Paul Brown, QC.

3.2 At that Public Inquiry, Tandridge Council was represented by a barrister to put forward its case regarding the OAN figure which was similar to the case put forward by the Rule 6(6) parties. The Planning Inspector did not find that the Core Strategy was out of date.

3.3 We quote here some key points from the closing submission of the Council’s barrister which he made on behalf of Tandridge District Council to the Public Inquiry Inspector. They are:

53 “First, the demographic projections are not robust when applied to the particular circumstances of Tandridge:

a. They are predicated upon a massive increase in population which bears no relationship to past trends of population growth – nearly double historic trends...”

54 “...It is agreed that the demographic projections are overwhelmingly driven by levels of net in-migration [Taylor xx]. If those figures cannot be shown to be reliable, the projections are not either [Taylor xx]. Thus if circumstances pertaining to previous levels of in-migration are not likely to persist, the projections are of limited value [Taylor xx].

55 c. “the Council has explained that in the past a number of large military and health sites (and employment sites) have been developed in Tandridge, unexpectedly;

d. the Council has also explained that there is a close correlation between the high number of completions recently achieved against the Core Strategy requirement and the high levels of in-migration at a similar time.”

57 “However that means that there is no assessment at all of what the appropriate housing market area is or therefore how migration figures ought to be fed into a wider analysis which allows whatever FOAN there might be for Tandridge to be decided.”

From this it can be seen that the Council’s case highlighted a number of the flaws which are also contained in the NMSS Objectively Assessed Needs Assessment which the Council has now included in its Local Plan documents.

3.4 The Council has given no explanation as to why it has so fundamentally changed its position and why it has now accepted an OAN containing similar flaws to those it previously highlighted and argued against to the Planning Inspectorate.
4. The deficiencies in the infrastructure documents.

4.1 As mentioned in the Collective Regulation 18 representation, these documents do not address the existing infrastructure deficit or the need to avoid future deficits by ensuring that infrastructure is delivered ahead of development.

4.2 In “Infrastructure Baseline Study: Part 1”, it is stated that, “In June 2015 letters were sent to all 10 of the surgeries in the District.....There were no responses from the 10 surgeries in the District so there is no indication of any specific requirements at this present time.”

We consider that a lack of response is not a valid basis for concluding there are no specific requirements, particularly as Oxted Health Centre has subsequently made clear that it received no letter from the Council. This example casts significant doubt over the robustness and reliability of the evidence base upon which the Council are making important decisions about future planning policies.

4.3 The conclusion that there are no specific requirements at present would indicate that the settlement survey consultation forms completed both by OLRG on behalf of its membership and also completed by many individual members, were not taken into account when preparing the infrastructure documents. The survey completed by OLRG is included at Appendix 1 and makes clear reference to the existing infrastructure deficit in Oxted. This deficit should be addressed before any more new building is permitted.

4.4 In particular, we would draw attention to the comments about Oxted Health Centre which serves a wide area and is very overstretched; about the shortage of school places; about road congestion and parking problems; about the overcrowded rail services.

4.5 With regard to rail infrastructure, the services from Oxted are already considerably overstretched and we understand there is no prospect of any significant increase in capacity without a new tunnel being built to bypass East Croydon. For cost reasons, operators have ruled this out for the foreseeable future. This is in contrast to other areas in the South East where rail capacity is being substantially increased, such as on the Thameslink, Crossrail and Javelin lines where development includes new stations and purpose built facilities for commuters.

4.6 The infrastructure documents give no idea what or how new infrastructure will be provided to meet the increase in population that is proposed. The Council has made no evaluation of the infrastructure’s ability to cope with housing on the sites it has identified as deliverable and developable. It has not considered provision of health services, schools, roads, parking, rail services or any other services. It has not factored in the existing infrastructure deficit. The full impact of the delivery strategies has not been identified.

We cannot see how sites can be deemed "deliverable and developable" when the new infrastructure that would be needed to support the housing built on them, has not been assessed nor has it been shown how it can be provided. Government guidance requires that infrastructure be assessed during the HELAA process.
4.7 All of the infrastructure providers state that increased housing provision will require additional capacity. However, the documents do not consistently refer to, nor apply, the correspondence from the infrastructure providers, and so Part 2 provides an inaccurate assessment of the amount of new infrastructure that is needed for each of the proposed delivery strategies.

5. The inappropriate inclusion of sites in the HELAA as “deliverable and developable.”

5.1 The failure to assess or address existing or future infrastructure requirements is one of the reasons the list for deliverable and developable sites is not consistent with national planning practice guidance.

5.2 As evidenced on pages 13 and 14 of the Collective Regulation 18 representation, there are other factors that have not, but should have been, taken into account. None of the sites in Oxted, Limpsfield and Hurst Green, or indeed anywhere else in Tandridge, has been properly assessed. The HELAA is wholly inadequate in terms of complying with government guidance and forms an unsound basis for assessing development options. We quote paragraph 64 of the Collective Regulation 18 representation:

64. In particular, in relation to national planning policy, the assessment does not take into account:
- the presence or setting of heritage assets (listed buildings; conservation areas, archaeological remains etc) or the impact of development on such assets (NPPF Para 129)
- the impacts on biodiversity including designated habitats, areas likely to provide habitats for protected species; areas acting as stepping stones for the migration of species (NPPF Paras 114; 117 – 119)
- the wider impacts on the landscape and green infrastructure context of the site (rather than just site features) using the Landscape Character Assessment (NPPF Para 109)
- the impacts on public open space (NPPF Para 73 – 74)
- the availability of sustainable transport links (NPPF Para 35)
- the proximity of sites to services and facilities (NPPF Para 34)
- the suitability of vehicular access for the scale of development envisaged (rather than the presence of existing access points) (NPPF Para 32)
- the impact on the environment and amenity experienced by would be occupiers and neighbouring areas
- the impact on the designated Green Belt (whilst this is assessed in a separate document, the presumption against inappropriate development should be noted as a major constraint at this stage)

5.3 The sites numbered OXT 006 and OXT 007 provide examples of where the Council’s assessment has failed to give proper consideration to, and take account of, relevant factors and so the conclusion that these sites are deliverable and developable is not justified.

5.4 Notwithstanding the fact that the site OXT 006 fulfils all the five purposes of the Green Belt, there are additional well documented problems with access and congestion which clearly make it unsuitable for development.
In addition, this is a much valued Green Belt field which, in the past, has been extensively used by walkers until it was recently fenced off. It is currently the subject of an application for several rights of way – application numbers CP563, CP564 to Surrey County Council.

5.5 Notwithstanding the fact that the site OXT 007 fulfils all the five purposes of the Green Belt, there are additional well documented problems with access and congestion which clearly make it unsuitable for development.

It is a very well-used public open space and abuts a potential Site of Nature Conservation Importance that was assessed by Surrey Wildlife Trust in May 2007 and recommended to the Council for early formal identification as an SNCI as an important area of wet woodland, rare in Surrey.

5.6 We emphasise the importance of the local Green Belt designation in protecting the unique character of Oxted, Limpsfield and Hurst Green and also in assisting redevelopment of key brownfield sites including the redundant Oxted gasholder site.

5.7 We note the Retail and Leisure Study says: “We understand the Gas Holder site has no immediate prospects of development....”

It is important this site remains a priority. Although it is a small site, it is a large eyesore in the small centre of Oxted and residents would like to see it re-developed. The existence of the Green Belt ensures it remains a priority consistent with Green Belt purpose 5 in the NPPF.

**Part Two**

6. Procedural deficiencies in the Local Plan consultation process and the failure to meet the consultation requirements of the NPPF.

**OAN and housing requirement**

6.1 In the Issues and Approaches document to which the Council has directed the public to read information about the Local Plan, it has incorrectly paraphrased the requirement of the National Planning Policy Framework with regard to meeting housing need.

6.2 Paragraph 11.0.1 on page 31 states: “Chapter 6 of the National Planning Policy Framework requires local planning authorities to meet their full objectively assessed needs and to identify and cater for those housing and economic needs.”
The Council has omitted any reference to the rest of NPPF paragraph 14 which states:

“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.”

Those specific policies include the Green Belt but this is not mentioned in these Local Plan documents.

6.3 The statement that the OAN figure of 9,400 homes has to be met in full has fundamentally misled members of the public who wished to make comments and who have contacted us for clarification. The wording gives a clear impression that the OAN is in fact the final housing target which the Council must meet. Furthermore, the implication is also given that those proposed approaches which do not deliver the OAN figure are less worthy of consideration by the consultees.

6.4 This incorrect paraphrasing has prevented some residents from taking part effectively in the consultation because they were under the false impression that the need figure had to be met. For others, it has caused confusion. At no point has the Council explained that this is a two stage process where the need figure is the first stage and the requirement figure is the second.

**Strategic Housing Market Assessment**

6.5 In November 2014, the Council arranged workshops for community groups and Parish Councils with SHMA consultants arc4 and Edge Analytics Ltd. At these workshops, community groups and Parish Councils were able to give their input into the SHMA work. In May 2015, arc4’s contract was terminated by the Council and it employed instead new consultants Turley Associates and Neil McDonald of NMSS. The Council did not notify community groups or Parish Councils of this change nor was any consultation or workshops arranged for them with the new consultants despite the Council being fully aware that community groups and Parish Councils wished to have input.

6.6 OLRG is now working with Robin Miller of Understanding Data Ltd who has 25 years of public sector demographic research, analysis and strategy experience and application. He works closely with Edge Analytics Ltd and represents them at Local Plan examinations, most recently at Bradford, Warwick, Cornwall, East Devon and Basingstoke and Deane.
Green Belt Assessment

6.7 In June 2015, the Council held a workshop for community groups and Parish Councils on the methodology it was proposing to use to review all of the District’s Green Belt. There was very short notice for this workshop and no papers or agenda were provided. The methodology itself was not shown to consultees before or during the meeting.

6.8 An opinion from Paul Brown QC was provided to the Council by OLRG on 23 June 2015 which highlighted flaws in the proposed Green Belt Assessment methodology. Important parts of this opinion were not acted upon as referenced in the Collective Regulation 18 representation. The opinion also included the following comments on the consultation:

26. Further, I am aware of the fact that there is concern in Tandridge over the speed with which the draft Methodology has been produced, and with the adequacy of the consultation exercise which has been carried out to date. This is clearly reflected in the “Late Responses” addendum, where officers have commented that

“Unfortunately due to committee cycles and the date of annual council, the Council were unable to publish any information on the Green Belt Assessment methodology any sooner.”

27. I find this a disquieting response. It is a well-established principle of public law, which applies even in cases where there is no statutory requirement to consult, that if an authority volunteers consultation, that consultation must be carried out meaningfully, in way which enables the public to participate. If, as the officers’ response appears to accept, committee cycles and the date of the annual council have prevented the earlier publication of the draft methodology and so made it difficult for the public to take part, the obvious solution would be for the Council to postpone its consideration of the draft until all comments have been received and taken on board.

6.9 The Council did not postpone its consideration and, two days later, approved the methodology.

Incomplete evidence base

6.10 Surrey County Council’s Infrastructure Study 2015 is not part of the consultation. It is stated that it is being finalised and will be published “in due course.” As Surrey County Council is responsible for providing most of the infrastructure needed to support new development in Tandridge, it is unreasonable that consultees are being given no opportunity to make comments on future provision because details are unavailable.

It is particularly unreasonable given there is substantial evidence of an existing infrastructure deficit and given that Surrey County Council’s current planning for future infrastructure provision in Tandridge District is based on the Core Strategy figure of 125 dwellings per year – that compares with 470 dwellings per year proposed in these Local Plan documents.

6.11 Another area where the documents demonstrate a lack of transparency is in regard to the areas for further investigation identified by the Council in its Green Belt review. It is
unclear what this means or why these areas are being investigated. What is certain, is that consultees are being given no opportunity to comment on the findings of the further investigation. Given the poor quality of, and flaws in, the Council’s Green Belt assessments, this is again unreasonable behaviour and does not meet the requirements for community consultation.

Consultation publicity

6.12 OLRG has recently attended a number of local groups and public meetings, some of them attended by several hundred residents extremely concerned about the Council’s behaviour over the consultation on the Local Plan documents and its perceived lack of openness. Many residents only became aware of the existence of the Local Plan consultation because OLRG, and other community groups, arranged for flyers to be delivered to hundreds of homes around the District giving details of the consultation.

6.13 There is widespread concern throughout Tandridge District that the consultation has been inadequately publicised and that the publicity there has been has failed to make clear the contents of the Plan. For example, no summary booklet has been prepared by the Council and no letter has been sent to households advising them of the consultation. It has been left to community groups to make residents aware. The documents themselves are opaque and confusing, at times misleading as explained above, and with important facts buried in footnotes.

6.14 The Local Plan is a very important document that will affect the future of all Tandridge residents. Therefore, much more effort should have been made to make details widely available and accessible. The lack of clear and easily accessible information that fully explains the implications and impact of each of the options has severely hindered the ability of residents to make informed decisions or indeed to take part at all.

6.15 The National Planning Policy Framework makes clear that local authorities should work with their communities in drawing up a Local Plan that reflects the distinctive characteristics of the area and the needs and priorities of local residents – in particular, in paragraphs 1, 155 and 69.

As explained in the Collective Regulation 18 representation, the Local Plan documents do not reflect the distinctive characteristics of the area and the needs and priorities of local residents.

Where communities have attempted to have input, that input has not been encouraged or properly considered. There has been little attempt at genuine dialogue or engagement with communities. The consultation on the Local Plan documents has been inadequate and has demonstrated a lack of openness and transparency.

Conclusion

The Settlement Hierarchy is misconceived and conflicts with the evidence base. The infrastructure documents, the HELAA and the Green Belt assessments are not fit for purpose.
with regard to delivering a sound Local Plan. The OAN calculation is flawed and inflated and the Council’s contradictory approach on this matter is unreasonable and unjustified.

The Council has not met the requirements for community consultation set down in the NPPF nor the commitments in its Statement of Community Involvement.
General Information

<table>
<thead>
<tr>
<th>Parish</th>
<th>Oxted, Hurst Green and Limpsfield</th>
</tr>
</thead>
<tbody>
<tr>
<td>Settlement</td>
<td>Oxted, Hurst Green and Limpsfield</td>
</tr>
<tr>
<td>How was information collated? (indicate with a Yes in all relevant boxes)</td>
<td>Individual</td>
</tr>
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<td>Responding Organisation</td>
<td>Oxted &amp; Limpsfield Residents Group (OLRG)</td>
</tr>
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<td>Contact Details (name)</td>
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<tr>
<td>Address</td>
<td>PO Box 233, Oxted Post Office, Station Road West, Oxted, RH8 9EH</td>
</tr>
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<td>Telephone</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:oxted.residents@btinternet.com">oxted.residents@btinternet.com</a></td>
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</tbody>
</table>

PART 1 - Services & Facilities

Part 1 is to consider what services and facilities exist within the settlement.

Retailing (Mark your answers with an x or write in text where required)

<table>
<thead>
<tr>
<th>Convenience*</th>
<th>None</th>
<th>One</th>
<th>Two</th>
<th>Three</th>
<th>Four+</th>
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<tbody>
<tr>
<td>Comparison**</td>
<td>None</td>
<td>One</td>
<td>Two</td>
<td>Three</td>
<td>Four+</td>
</tr>
</tbody>
</table>

*Convenience shops supply everyday essential items, including food, drinks, newspapers, confectionery
**Comparison shops supply items not obtained frequently, including clothing, footwear, household and recreational goods

How well are these facilities utilised?
(Rate each one 1-5, 0 = Not well used, 5 = Central to the community and very well utilised)

<table>
<thead>
<tr>
<th>Shop name/location</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>We are responding to this survey on behalf of our 1700+ members most of whom live in Oxted, Hurst Green and Limpsfield although there are a number from other areas in Tandridge District.</td>
<td></td>
</tr>
<tr>
<td>As we cover a comparatively large and diverse area, we do not think it would be sensible to attempt to fill in details for all the individual shops, restaurants, pubs etc.</td>
<td></td>
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<tr>
<td>Therefore we have concentrated on general and specific points that have been</td>
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</table>
Lack of services and facilities has been flagged up by very many of our members and is causing widespread public concern. It is considered that the existing infrastructure is in many instances below the acceptable standard and close to breaking point. Despite Tandridge building more than double its housing requirement for nearly twenty years, there has been very little corresponding increase in infrastructure and services and no evidence of strategic planning to accommodate the large numbers of new residents.

There has been a very large amount of in-migration into the District from other areas. Tandridge District has consistently built far in excess of its local need and, in so doing, has met a large amount of the housing need in areas such as Croydon that have failed to provide enough housing to meet their own need.

To give some context, we have compared housing completion rates from Tandridge District Council (TDC) with those from Guildford Borough Council (GBC):

- TDC population: 83,000; GBC population: 137,200
- TDC households: 33,300; GBC households: 54,000
- Net completions for years 06/07 – 13/14: TDC 2084; GBC 2003

Both the rate and the absolute numbers of houses being built in Tandridge are higher than Guildford despite Tandridge being a great deal smaller. As a consequence of this high rate of building without supporting services, schools, health services, roads and parking are under severe strain. There is a great deal of catching up to do with regard to infrastructure and we would welcome this as a key message in the SHMA and Local Plan Review. The current infrastructure provision is already inadequate and this must be a major limitation on any increase in the current housing requirement.
Additional comments on retail services (proposed closures, opening hours, parking, access are the services/facilities regularly utilised by those not living in the immediate settlement etc):

Parking problems, particularly as a result of commuter parking in Oxted, have been highlighted by many members. Comments:

“Parking is the real problem, especially during the week when the council office car park is unavailable to the general public.”

“The town has a shortage of parking spaces outside of weekends.”

“Parking is an issue with narrow side roads used by commuters & others blocking access to houses for essential services.”

“Why does TDC not compulsory purchase the redundant Oxted Gas Holder site to provide more commuter parking (via Morrison underground car park) by providing an entrance/exist under the railway line to reduce the congestion on local roads?”

Comments on mix of shops:

“There are a lot of charity shops … we do not need any more. We do need more comparison shops as we have to travel to East Grinstead, Sevenoaks or East Croydon to access shops such as M&S, M&Co, Robert Dyas etc.”

“Too many charity shops in Oxted, although these are of a high standard.”

Other facilities

<table>
<thead>
<tr>
<th></th>
<th>None</th>
<th>One</th>
<th>Two</th>
<th>Three</th>
<th>Four+</th>
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<td>Public House(s)</td>
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<td>Places of Worship</td>
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<td>Post Office (either within another shop or standalone)</td>
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<td>Petrol filling station</td>
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<td>GP Surgery</td>
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<td>Bank or cash machine</td>
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<td>Chemist</td>
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<td>Dentist</td>
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<td>Hot food takeaway</td>
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<tr>
<td>Hairdresser/beauticians</td>
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<th></th>
<th>Yes</th>
<th>No</th>
<th>Frequency</th>
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<tbody>
<tr>
<td>Does the mobile library visit?</td>
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</table>

Additional comments on other facilities (proposed closures, opening hours, parking, access etc):
Oxted Health Centre is a source of major community concern. A large number of members are worried that it cannot cope safely with the demands of the existing population and no further increase in numbers should be allowed until capacity improvements are delivered. Very serious worries were expressed about this facility.

We copy below a number of comments to underline the strength of the response from members about this facility:

“We need another (or larger) medical centre. Waiting more than 2 weeks to see your doctor is a disgrace.”

“The time taken to see one’s doctor is so long (last occasion was over a fortnight) that one is, in the meantime, cured naturally, gone to A&E, or dead!”

“We will all have experienced how difficult it is to get a prompt appointment at the health centre in Oxted. The number of patients assigned to each of the GPs is extremely high (over 2,000) and it is often not possible to see your own GP anyway because of the number of appointments being made. We know there used to be an overflow GP surgery in Hurst Green many years ago but it was closed (when the land was sold off?). The Developers building in Holland Lane (Ashill?) were compelled to pay £50,000 towards new health facilities in Hurst Green, but this was obviously not enough and there is no sign of it happening.”

“The GP surgery is struggling to cope. To get an appointment at the moment you have to wait 2-3 weeks. With extra people brought in for new housing, how will the GPs manage? Will we have to wait a month for an appointment. They cannot take on extra GPs because they couldn’t physically take on more staff due to shortage of space.”

“Today (26th May), my daughter-in-law, tried to make an appointment to see her GP for migraine and the first available appointment she can obtain is Thursday 4th June. Without major building works on some other site, to allow more housing locally, would make these health centre problems totally unworkable.”

“why is there no Health Centre in Hurst Green to relieve the pressure on Oxted Health Centre which is clearly struggling and at times unable to cope with current demand?”

“GP Surgery cannot cope at present and with more houses in the area it will be swamped.”

“Even with the considerable improvements made to East Surrey Hospital by the present CEO, the task of coping with the rising population is an impossible one. Having personally experienced recent admission to the CCU I can vouch for the monumental task they face in cardiology alone. Similarly, Oxted and Hurst Green need a second surgery, indeed a second practice would be more than justified.”

“Oxted Health Centre is completely overloaded and additional facilities should be provided in the Hurst Green/Holland area.”

“We are happy living in Oxted, and being retired don’t need many facilities. But we do sometimes now need the local doctor, and are dismayed by the waiting time of nearly three weeks for a non-urgent appointment.”

“If more retirement accommodation were to be built in the Oxted/Hurst Green area this would be the last straw that broke the camel’s back of the Health Centre.”

Community Facilities

| Yes | No |
School hall (for rent) |  
Village Hall |  
Church Hall |  
Meeting room |  
Community Centre |  

| Other facilities (please specify) |  

Facilities

| Do you feel that the range of services and facilities currently in place are consistent with the needs of the settlements population? |  
| Are there any services and facilities that you feel would be beneficial to the community that aren't currently in place? |  
| Are there informal and formal recreation and play areas? |  

Sport and recreation*

<table>
<thead>
<tr>
<th>Recreation ground</th>
<th>Yes</th>
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<tbody>
<tr>
<td>Cricket pitch(es)</td>
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<td>Bowling Green(s)</td>
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<td>Football pitch(es)</td>
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<tr>
<td>Rugby pitch(es)</td>
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<tr>
<td>Tennis Court(s)</td>
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<tr>
<td>Children's equipped play area(s)</td>
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<tr>
<td>Skate Park(s)</td>
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<tr>
<td>Multi game play area(s) (i.e. netball/basketball etc)</td>
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<tr>
<td>Allotments</td>
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<tr>
<td>Public access to school recreation areas</td>
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<td>Community Gardens</td>
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<tr>
<td>Public access to open green spaces (woodland, commons etc)</td>
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<td>Cycle routes</td>
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<td>Village green</td>
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<td>Market/town square</td>
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<td>Other (please specify)</td>
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The Council will shortly be carrying out a Wellbeing and Space Strategy which also looks at the provision and quality of open spaces and recreation grounds. The information gained from this survey will be passed over to those preparing the Strategy so that it may be used, where appropriate.

**Schools/Education**

Due to the fact that educational catchments extend across parish and districts, please also include those institutions which you know are regularly utilised by the community within your area.

<table>
<thead>
<tr>
<th></th>
<th>Independent (mark with x)</th>
<th>State (mark with x)</th>
<th>Are you aware of any capacity issues, i.e. over/under capacity?</th>
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<tbody>
<tr>
<td>Primary Schools (name/location)</td>
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<tr>
<td>Secondary Schools (up to 16yrs)</td>
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<tr>
<td>Higher education (16yrs+)*</td>
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*Please also include those which you may have listed under Secondary schools where overlap occurs

**Do you have any other comments to make in terms of the educational institutions within your area/catchment?**

There is general concern that the state schools are increasingly unable to accommodate the large number of pupils. The leader of Surrey County Council, David Hodge, has recently stated that Surrey as a whole is 13,000 school places short – that is excluding any new housing being built. Comments:

“The population of pupils at Oxted Secondary School is far too large; the catchment area too wide; in reality two schools are needed.”

“Oxted School is now one of the largest secondary schools in the country with well over 2,000 pupils. It has about 500 pupils in the Sixth Form. It is a well-known fact that Tandridge needs another secondary school and this has been promised to us, certainly for over 20 years, by various politicians. There is insufficient space in the current school buildings for all the pupils, particularly sixth formers who need their own space for study periods. Recent issues about the status of the school are a reflection of the fact that it is too big for one headteacher to manage. Oxted School has to take pupils from a wide catchment area, which puts additional pressure on public transport. And local roads become extremely congested at the end of the school day.”

“In the 2015/6 school year there is an inadequate number of available places for a 5 year old to attend Hurst Green First School even when your child has attended their pre-school nursery class for the preceding 18 months (five days a week).”

“Primary schools overloaded.”

“I am particularly concerned about the effect that the new housing will have on the schools. Already
this year we have seen numerous local families not get the school if their choice for their children. What will happen to families already living in Oxted and Hurst Green when more children move into the area? Will the local schools have to expand? Will local children be sent to schools further afield?"

“Primary schools in this area do not have capacity this year. Many families finding they have children in schools separated by 8+ miles.”

“Oxted Schools are overloaded and additional facilities should be provided elsewhere.”

**Employment**

<table>
<thead>
<tr>
<th>Excluding the shops and facilities you have already referred to above, are there any businesses, operating within the settlement/area i.e. offices, industrial etc.? If so are businesses growing or declining?</th>
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<tbody>
<tr>
<td>Does the local labour market contain the skills needed by local businesses?</td>
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<tr>
<td>Are businesses owned and operated by local* people?</td>
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</table>

*Those who live within the settlement, District and/or 5 miles of the place of business.

**Do you have any other comments relating to business and employment in the local area which you feel is relevant?**

There is relatively little employment available in the local area and the recent local trend has been a loss of local employers and employment land. Levels of full-time employment in Tandridge itself are in decline. This decline is consistent with the conversion into housing of a number of large local employment sites and also the predominantly rural and distributed nature of the District. The decline in full-time employment is in sharp contrast to other nearby areas which have experienced increases in both full-time jobs and wages even since the 2008 credit crisis. The absolute level of full-time wages in Tandridge is lower than nearby areas. Wage growth is also much lower and the differential is increasing. As employers have become more fragmented with less call for larger offices in locations such as Oxted and Hurst Green we have seen an increase in the number of people based from home for their work – this highlights the need to ensure a robust and efficient fibre optic network across the district.

**Potential changes**

Are you aware of any proposed changes to facility and service provision that may be happening either currently or in the near future? These may be permitted, under construction or proposed through neighbourhood plans or other policy-based documents.
Outside of the District

Does the community regularly make use of services and facilities outside of the district which are closer, more accessible and better equipped to serve the needs of the settlement? If so, what are these and where are they i.e. Reigate, Croydon, East Grinstead etc?*

Members say they use shopping facilities at Reigate, Croydon, East Grinstead and Bluewater.

*Only include those services/facilities where there is a well-established pattern of travel i.e. to utilise a large supermarket or for employment purposes etc.

PART 2 – Transport & Accessibility

Part 2 seeks to gain an understanding of how the settlement is served by sustainable methods of transport and how this impacts upon the ability to access services, including via the internet, from elsewhere.

Public Transport

<table>
<thead>
<tr>
<th>In the settlement, Is there:</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>An hourly bus service*?</td>
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<tr>
<td>A daily bus service (Monday – Saturday)*?</td>
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<td>No bus services*?</td>
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<tr>
<td>A railway station?</td>
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* (to either: Oxted, Caterham, Redhill, Reigate, Crawley, Horley, Croydon, Sevenoaks, East Grinstead, Bletchingley, Godstone, Biggin Hill, Bromley or Edenbridge)

Do you have any other comments to make relating to public transport within your area? Including any issues regarding effectiveness of transport services and how well public transport is utilised by the community.

As stated above, there is little local employment available and commuting out of the District is the norm despite the limited rail links and the overcrowding. It should be noted that there is virtually no new rail provision planned to accommodate any increase in commuters.

Any perceived attractiveness of Tandridge for a commuter is largely based on the provision of the existing rail infrastructure, however unlike other areas such as Bromley and Croydon which stand to benefit from additional investment in providing more travel capacity, Tandridge is already at its capacity. The recent platform lengthening programme is intended to mitigate existing overcrowding, and not to accommodate future growth.

Network Rail states in its latest future plan that, due to the fundamental bottleneck at East Croydon, there is no possibility of additional rail services for lines that serve Tandridge. Without additional rail services, new households will be locked into commuting by car, which is unsustainable.

Rail services comments:

“The number of commuters using the train lines from Oxted to London is more than ever. It is usually impossible to get a seat during the rush hour (unless you purchase a first class ticket) despite the
trains now having 12 carriages. Not only does this create an extremely stressful experience, on a daily basis, for commuters – it is also a dangerous situation, that cannot cope with any further increase in numbers, especially when there are problems with the service.”

“Rail services from Oxted are already overloaded with standing room only on most trains into London.”

“Trains are over-crowded (especially so during the peak rush hours) due to the number of additional houses being built between East Grinstead and Oxted. As the train line is nearing capacity in terms of the number of trains it can operate, and the finite ‘length’ of trains, together with the problems of a lack of car parking and the general capacity of transport on the roads, future housing development needs to be scaled back.”

Bus services comments:
“Route 594 runs from Oxted to Westerham but only sometimes via the Chart. The excuse given is that it would increase journey times to include the Chart on every journey. (If that’s the case, why include the Chart at all?!) In fact, the modest increase in journey times would be outweighed by the advantages to travellers currently disadvantaged. It is also the case that there are very few properties on the A25 from the Kent Hatch Lane turn-off to Westerham when there is a whole settlement on the Chart.

Also, the bus times to and from Oxted Station rarely coincide with outgoing or incoming train services. As Oxted is the only station on the route there is no problem of putting out of joint connections at other stations.”

“Buses4U offers a good service but it is difficult to see it advertised prominently anywhere. An obvious place would be on bus stops but too obvious for those who run the service. Also, while this is a public service, mass bookings are allowed (eg, a group of friends always go to this or that place at a certain time each week and so can book the whole bus.) This means that at times rather then being a public service, it is a private group taxi service.”

Accessibility

How well connected to the road system is the village? Please highlight the names of the key roads and identify where you feel capacity/safety issues currently exist.

Commuter parking, Hurst Green
“Can something be done to stop commuter parking. The green at Hurst Green becomes a ‘have a go’ race to get across, and Knights hill is really dangerous as one cannot see round the bend.”

Oxted:
“The problem with all roads in Oxted north of the A25 is that they are filled with parked cars from commuters, shop and office workers and shoppers, so that in many cases the roads are already down to a single track throughout the day.”

“We suffer in Woodland Court with commuter & other parking blocking the road so sometimes dustmen cant access houses & if ambulance or fire service were called, they would also have difficulty.”

“Safety issue is speed along A25. There should be a 30mph limit from the Limpfield traffic lights to West Hill.”

“The Highways have been completely unaware of the potential road safety problems where parking is permitted on East Hill Road adjacent to the A25. It is difficult and dangerous to exit or enter East Hill Road with several cars waiting to access the A25
and entering East Hill Road with the parking of cars almost up to the A 25. The Highways should be made aware of this.”

How well connected electronically is the settlement? (For example is broadband connection possible?)

“Broadband in Limpsfield is very slow.”

How easy is it to move around the village on foot or by cycle?

“Walking along parts of Bluehouse Lane is not easy. There are also some safety issues on the eastern end of Bluehouse Lane now that the central markings have been taken away following the road resurfacing. Cars travel too fast and the hashed/pedestrian walkway area has been removed in some parts.”

Any other comments

Do you wish to make any other comments in addition to those you have made above?

General comments on infrastructure:

“In short too little money has been invested over the last 10-20 years in infrastructure. Everywhere is now over-crowded due to the lack of investment and any further development of housing should only be considered if first there is infrastructure investment.”

“We live in an area which has a broken infrastructure: the NHS cannot cope; our schools are full; the roads and pavements are death traps; parking is impossible. And yet all we do is carrying on building more houses and lurching from one ill conceived plan to another.”

“There has been a steady rise in the number of vehicles coming into the town.(Oxted) The roads, other than the A 25, are essentially rural and don’t lend themselves to expansion, therefore traffic congestion would only increase if further housing development were allowed. The problem is aggravated by all day parking by commuters using the railway services to London making for congestion in the week.”

“A railway station with insufficient parking, schools with insufficient spaces, Doctors surgeries with lousy waiting times a high street with no parking most of the day, roads which disintegrate even during the summer months and so on.”

“Tandridge is already struggling to absorb the consequence of infill development which is now permitted without regard to a heavily pressurised infrastructure: hospital medical services; general practitioner services; schools; gas; sewage and car parking already stretched to the limit by an influx of passengers using the railway services to London.”

“The roads in the area around Oxted are incapable of absorbing more traffic; they belong to the age of the horse and cart and are not amenable to improvement.”

“It appears that a number of green-field sites have been bought by developers with plans to build many residential homes on them. The local infrastructure would not be able to cope with this expansion in housing.”
Many thanks for partaking in the Settlement Survey.

Please ensure that your responses are returned to the Council by **26th June 2015**.