Listed below are some key points that may be useful for writing in to the consultation. Please do send your views to Tandridge Council whether they are put in a short email/letter or in a more detailed response. The more residents who write in, the more chance there is of protecting the area from being swamped by overdevelopment and of preventing Tandridge becoming a dormitory district.

We have now received legal and planning advice which says none of the Council’s Delivery Strategies are compliant with national planning policy. See “Comments on the Council’s Options (Delivery Strategies)”

All the documents mentioned below can be read on these two links: http://bit.ly/1YtPs7R and http://bit.ly/1Ysp0vg. To see the sites near you that the Council has identified as “deliverable and developable” for new housing, go to the document called “HELAA Appendix 3” on the first link.

Please do write in before Friday’s closing date. If you have already sent in comments, you can always send more.

To submit comments either:

1. Email them to: localplan@tandridge.gov.uk OR

2. Send a letter marked “Local Plan consultation” to: Planning Policy, Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey, RH8 0BT

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COMMENTS ON THE HOUSING NEED FIGURE See “The Strategic Housing Market Assessment 2015: Tandridge’s Objectively Assessed Housing Need Technical paper” – known as the “SHMA on this link http://bit.ly/1YtPs7R

● The documents assert there is a "need" for the huge number of 9,400 new houses in Tandridge District – that means 470 new houses every year which is almost 4 times the current housing requirement. This figure is inflated, unreliable and contrary to the National Planning Policy Framework and National Planning Practice Guidance.

● The Council’s own barrister submitted a large amount of evidence to the Planning Inspectorate in 2014 to demonstrate that, with regard to Tandridge District, such high need figures are inflated, unreliable and contrary to the National Planning Policy Framework and National Planning Practice Guidance. We believe it is wrong for the Council to contradict itself in these Local Plan documents.

● The vast majority of these new houses would be built on Green Belt land for a massive and sustained increase in inward migration from Croydon and other London boroughs and not for genuine local need. Government policy does not require Tandridge Council to meet the housing needs of other areas, particularly when doing so involves release of Green Belt. Neighbouring Croydon is not releasing any Green Belt and has not carried out any assessment of its Green Belt.
The need figure would mean a likely rise of a third in the District’s population with approximately one new house built for every four existing. This is unrealistic and unsustainable in a predominantly rural District such as Tandridge.

The evidence documents contradict each other because one set shows that while Tandridge has seen loss of local employment since the mid-1990s, the local economy is now stable, albeit with limited growth prospects. However, the documents related to housing need unrealistically assume that local jobs will rise by more than a third. This increase is clearly unrealistic and inconsistent with the rest of the evidence documents that describe Tandridge.

National planning policy makes clear that Councils should act to protect Green Belt land in their Local Plans yet most of the options rely on releasing significant amounts of Green Belt for new housing. Most of the sites that have been classed as “deliverable and developable” are located in the Green Belt.

Building on the scale proposed would destroy the rural character of the District forever.

The documents show that the rate of house building in Tandridge since 1980 has been consistently higher than the rate in the rest of England – in some years more than twice as high.

All this new building has not resulted in either more affordable housing for local people or economic growth – instead it has resulted in large inward migration from London. The Delivery Strategies in this Plan would bring more of the same but on a much larger scale.

The Council’s shortage of money should not be a factor in deciding how many new houses to build and how much inward migration to take. In recent years, the Council has become heavily financially dependent on the money it gets from the New Homes Bonus. The more it builds, the more it gets.

COMMENTS ON INFRASTRUCTURE There are 4 documents on this link http://bit.ly/1YtPs7R. In particular, see the conclusions in the documents “Infrastructure Baseline Study: Part 1” and “Infrastructure Delivery Plan Baseline Part 2.”

This scale of building would put intolerable and unsustainable pressure on infrastructure such as schools, health services, roads, rail services and parking which are already struggling to cope with the existing demand placed upon them. Other services, such as water, landfill and cemeteries are also at full capacity. More large scale development would be even more untenable for the District’s infrastructure.

There is a wait of two weeks or more for an appointment at Oxted Health Centre, the schools are full, there are major problems with parking, roads, rail services and other infrastructure.

The infrastructure documents give no idea what or how new infrastructure will be provided to meet the increase in population that is proposed. In some instances, the documents appear misleading. For example, regarding GPs services, the Council states it has written to all 10 surgeries in the District but received no replies and has therefore concluded that: “there is no indication of any specific requirements at present.” It is unjustified to come to such a conclusion based on no response, especially when there is clear evidence that there are problems meeting existing demand, let alone the demand from the proposed huge increase in population.
NB: OLRG has now learned that Oxted Health Centre have said they never received any letter from the Council’s Planning Department asking for their views on the impact of the new development proposed in the Local Plan documents.

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

- The documents show virtually no new school places are planned. Any school place planning that has been done is based on the projected population growth in the current Local Plan – almost four times lower than that which is now being proposed.

- The documents say that just over 60% of employed residents commute out of Tandridge to work, most of them by car. The rail services are already overcrowded. Again, the documents appear misleading because they do not make clear that there is no provision to increase services in the train operators’ 20 year plan. Local bus services are being reduced. This means travelling to work by car will be the only option. This is unsustainable and so contrary to the National Planning Policy Framework.

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

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

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

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

On this link [http://bit.ly/1_YtPs7R](http://bit.ly/1_YtPs7R) click on “GREEN BELT ASSESSMENT APPENDIX D” to see how the Council has assessed the importance of the Green Belt near you. The Council has only assessed it against 4 of the 5 purposes of the Green Belt contained in paragraph 80 of The National Planning Policy Framework which are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
● The Council should have assessed against all 5 purposes, especially where it is clear Green Belt land has fulfilled purpose 5, for example in Oxted where the existence of the Green Belt keeps pressure on for the re-development of the redundant Gasholder site.

● The assessments have not been carried out properly. The methodology used for them is flawed.

● In June 2015, an opinion from a leading planning QC highlighting a number of flaws in the methodology was submitted to the Council. The Council did not correct the methodology. The resulting assessments are not reliable or robust.

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

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

● See also “Green Belt Assessment Appendix F” which has a map of Green Belt areas the Council has identified for “further investigation.” It is unclear what this means or why these areas are being investigated. The conclusions regarding these areas should have been included in this current consultation because residents will get no opportunity to comment on them later and so this is not proper consultation.

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

**COMMENTS ON THE COUNCIL’S OPTIONS (DELIVERY STRATEGIES)** See the Council’s “Issues and Approaches” document on this link [http://bit.ly/1Ysp0vg](http://bit.ly/1Ysp0vg). NB: Option 1 proposes no new building and has already been ruled out by the Council. We do not understand why it has been included as an option.

● None of the Delivery Strategies are sound, justifiable or compliant with national planning policy.

● Delivery Strategies 3-6 propose large amounts of building on the Green Belt, as well as open spaces/recreation grounds, and require the Green Belt boundaries to be changed. These options are based on an unreliable needs figure which includes unrealistic economic assumptions that are being used to justify extensive release of Green Belt for inherently unsustainable development.

● Option 2a requires building on open spaces/recreation grounds and 2b does this too, as well as relying on a blanket density of 70 dwellings per hectare with no regard for local character which in many areas is much lower than that.

● The Green Belt is crucial to the character of Tandridge District. Building on the scale proposed in options 3-6 would destroy the character of the area.
COMMENTS ON THE COUNCIL’S ISSUES AND OBJECTIVES  On this link http://bit.ly/1Ysp0vg

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

● The Issues provide the context for the objectives, vision and policies of the new Local Plan. The Issues do not accurately reflect Tandridge and are not relevant to Tandridge and so a Local Plan based upon them will not be sound or appropriate.

● The most important issues are to protect the local environment and the Green Belt and to protect local infrastructure from being swamped by over-development. These issues have not been addressed in the Local Plan documents.

● The objectives make no mention of protecting the local environment from massive over-development or of protecting the Green Belt.

● The objectives appear to be a wish list of what would happen in an ideal world and not reasonable and proportionate. Local plans are supposed to be reasonable and proportionate, not wish lists. The Plan gives no idea of how any of the objectives are to be achieved.

COMMENTS ON THE SETTLEMENT HIERARCHY DOCUMENT  On this link http://bit.ly/1YtPs7R

● The document titled “Settlement Hierarchy 2015” persistently portrays Tandridge’s settlements as larger and better resourced than they actually are. Oxted is ranked at number one and throughout this document and others, is erroneously portrayed as a large town with attempts made to equate it to Crawley, Redhill and East Grinstead – for example, see paragraphs 7.13 and 7.65.

NB: The larger and more sustainable the settlements are made out to be, the more development will be directed towards them. Table 3 in the document gives the settlement ranking - the higher the ranking, the more new development will be directed to that location.

● An example of the misrepresentation of Oxted occurs with health provision. In Table 3, Oxted is given a score of 5 for health provision. This has been managed by including chemists which is a major flaw in the methodology. A chemist cannot be considered equivalent “health provision” to either a GP surgery or a hospital. As everyone knows, Oxted has a single overstretched GP surgery serving a very wide area. The consequence of grouping chemists together with GPs in the scoring system is that Oxted appears to be much better served with health provision than it actually is.

● In the Spatial Approaches Topic Paper 2015, Oxted, Limpsfield and Hurst Green are frequently described as an “urban conurbation.” The definition of the word conurbation is “an extended urban area, typically consisting of several towns merging with the suburbs of a central city.” Oxted, Limpsfield and Hurst Green are not a conurbation.

● There are many other instances where the portrayal of the size and sustainability of settlements in Tandridge District does not fit the reality of the Tandridge we know.
COMMENTS ON CONSULTATION

● Many residents have been fundamentally misled by the Council’s incorrect paraphrasing of the requirement of the National Planning Policy Framework (NPPF) with regard to meeting housing need. Paragraph 11.0.1 on page 31 of the Issues and Approaches document on this link http://bit.ly/1Ysp0vg 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.”

This is wrong because it 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. This incorrect paraphrasing has prevented residents from taking part effectively in the consultation because they were under the false impression that the need figure had to be met.

● The consultation has been inadequately publicised and the publicity there has been has failed to make clear the contents of the Plan. No summary booklet has been prepared by the Council and no letter has been sent to households advising them of the consultation.

● The documents are opaque and highly confusing with important facts left out or buried in footnotes.

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

● The National Planning Policy Framework makes clear that local authorities should work with their communities in drawing up a Local Plan that reflects the distinctive characteristics of the area and the needs and priorities of local residents – in particular, in paragraphs 1, 155 and 69. The Council has not met the requirements for community consultation. Where communities have attempted to have input, that input has not been properly considered.

● The Council has not allowed any contact or consultation with residents groups or Parish Councils by the new consultants who have drawn up the housing need figure. Previous consultants, contracted to do the same work and who held workshops with residents groups/Parish Councils, were sacked by the Council in May 2015 and new consultants were employed at considerable cost to the taxpayer.

● A leading planning QC’s opinion provided to the Council highlighting flaws in the Green Belt Assessment methodology was not incorporated into that methodology. The Council proceeded with a flawed methodology and has now produced flawed Green Belt Assessments.

● There are many Tandridge residents without the internet access needed to read the documents in the way they have been presented. These residents may only access the documents by visiting a public library or the Council Offices in Oxted. It is unreasonable to expect them to read such a mass of documents in this way and they have been badly disadvantaged.