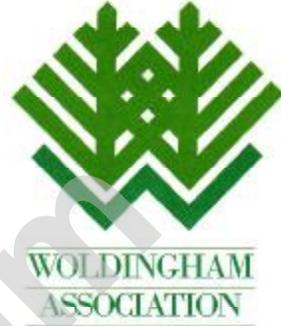


8 October 2017

Please reply to:
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Woldingham, nr Caterham
CR3 7DJ

Planning Policy Team
Tandridge District Council
Council Offices
8 Station Road East
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THE WOLDINGHAM ASSOCIATION LTD
LIMITED BY GUARANTEE
REGISTERED IN ENGLAND No 65035



Dear Planning Policy Team,

This representation is to the 2017 Regulation 18 Local Plan Garden Villages Consultation from the Woldingham Association. We are not answering the questions in the consultation because the questions imply acceptance of the Preferred Strategy and the proposed garden village, and we wish to register our strong objection to both.

The Woldingham Association was founded more than 100 years ago to conserve and protect Gilford's original vision of Woldingham. We were the de facto Parish Council until we helped establish the Woldingham Parish Council in 2000. We have been active in planning policy and planning applications for many years. We comment on individual planning applications and participate in planning appeals, hearings, Public Inquiries and Planning Policy Examinations. We also obtain professional advice in preparing some of our submissions.

This 2017 Regulation representation should be read in conjunction with our two previous submissions for the 2016 and 2015 Regulation 18 consultations. We also co-signed the Collective Regulation 18 representation along with numerous Parish Councils and

community groups in the 2015 Regulation 18 consultation. We have studied the garden village consultation documents, the Preferred Strategy and a number of the supporting evidence documents available on the Tandridge web-site to prepare this response.

The Garden Villages Consultation and the Preferred Strategy

We would like to register our objection to the Preferred Strategy and the proposed garden village because we believe that the proposed approach is tilted firmly away from optimising and enhancing the distinctive and unique characteristics of Tandridge towards an approach that is actively detrimental to them. We believe that the Preferred Strategy and the proposed garden village are contrary to the sustainable development objectives embodied in the NPPF.

The Collective Regulation 18 document (which we co-signed) explains that the vast majority of the objectively assessed housing needs figure of 470 dwellings per annum (dpa) is for net inward migration. This figure is inflated because historically other districts did not build enough houses and Tandridge built far more than enough and so the resulting net migration figure is not related to housing need that is connected to Tandridge. We believe that it is incorrect and not compliant with the NPPF for the Preferred Strategy to be based on delivering a housing needs figure that does not reflect housing need connected to Tandridge.

Furthermore, it is also not factually correct for both the first page of the Tandridge garden village consultation web-site and the letter sent to residents to state that the garden village will “provide much needed homes for local people”. Contrary to the situation in other districts and media stereotypes, the rate of natural change in Tandridge is unusually low and the 2015 SHMA evidence documents show no evidence of acute housing shortage in Tandridge.

In light of the above, the proposed release of Green Belt that accompanies the Preferred Strategy is both unwarranted and disturbing given that the Metropolitan Green Belt was

originally created to contain the sprawl from London, yet the Preferred Strategy is proposing to release large amounts of Green Belt for outward migration from London – in effect “sprawl” – and which has nothing to do with housing need in Tandridge.

The proposed release of Green Belt is even more worrying in light of the explicit protection given to the Green Belt in the NPPF and the adverse impacts on environment, landscape, biodiversity and services/infrastructure from just the proposed garden village sites identified in the documents accompanying this consultation available on the Tandridge web-site. These adverse impacts include, but are not limited to:

- increased traffic, congestion and pollution on roads and motorways – both within and beyond the borders of Tandridge. In effect, the Preferred Strategy pollutes the “green lung” of London.
- negative impacts on the environment and biodiversity – both within and outside of Tandridge, and the consequent negative impact on species and habitats.
- loss of valuable high quality farmland, soil and agriculture, and the consequent negative impact on the rural character and economy of the countryside.
- detrimental impact to predominately rural and unspoilt character and vast swathes of open Green Belt countryside and other high quality landscapes, and
- increased pressures on infrastructure and services both within and outside of Tandridge due to the lack of local services and infrastructure and the consequent reliance on other districts to provide them.

The 2017 supporting documents identify these significant adverse impacts from the proposed garden village sites even though the proposals are at a very, very high level and so the full extent and scope of the proposed garden village is unknown. The cumulative adverse impacts can only be much worse and more wide-ranging when all elements of the Preferred Strategy (e.g. Tier 1 and Tier 2 development) are taken into account. Some of these adverse impacts occur because the car is the only practical choice for access to employment, services and infrastructure and the Preferred Strategy has not taken this important sustainability attribute into account.

We believe that the introduction of a single, generic Green Belt objective into the Preferred Strategy does not reflect the importance of the Green Belt to the distinctive character of Tandridge. A single objective also ignores the other high quality landscapes, Areas of Outstanding Natural Beauty, and important areas of biodiversity that are also distinctive to Tandridge and valued by local residents and visitors. The protection of these important landscapes, natural assets and the Green Belt are all embodied in the NPPF.

We consider that one of the important distinctive attributes of Tandridge to be the very large expanses of high quality landscapes, biodiversity areas, and open countryside. Support for this distinctive attribute is shown by numerous policies in the existing 2008 Core Strategy, including policies that seek to protect this countryside “for its own sake.” Tandridge includes many nationally advertised footpaths and walks (Vanguard Way, Greensand Way, Tandridge Border Path, etc) and these are used by thousands of people every year.

Tandridge has also experienced significant growth in cycling in recent years. Cyclists are attracted to this particular area because of the hills – which are excellent for improving rider fitness – and the opportunity to pedal for many miles through the countryside on relatively quiet rural roads and lanes.

These large expanses of uninterrupted countryside are particularly valuable as they are adjacent to London and are accessible by train from London. This means that it is not just local residents that enjoy and value these areas. This is why we strongly believe that it is vital that their geographic contiguity be retained for current and future generations – both within and outside of Tandridge -- to enjoy. This is consistent with the NPPF.

However, the proposed garden village locations and the proposed developments in the Green Belt around Tier 1 and Tier 2 settlements will lead to significant encroachment into and fragmentation of these large expanses of countryside. As explained above, the

Preferred Strategy and the proposed garden villages will see significant increases in traffic and air pollution, which will be severely detrimental to the wide variety of recreational opportunities currently enjoyed by visitors and local residents. This is contrary to the NPPF.

We are also very concerned that the Preferred Strategy and Housing and Economic Land Availability (HELAA) are intending to over-turn existing recently adopted, NPPF compatible plan policies, such as those in Tandridge District Local Plan Part 2, and, by implication, Neighbourhood Plans, which may also include the Woldingham Neighbourhood Plan.

The HELAA lacks the detailed constraint information required by the Planning Practice Guidance (PPG) and so the HELAA cannot be relied to produce a realistic, deliverable land allocations trajectory for the plan period. The detailed master planning for the proposed garden village is postponed until after the emerging Local Plan is written, which adds to the uncertainty. All of this increases the risk that Tandridge will not be able to demonstrate a five-year housing land supply, which puts all of the Tandridge Green Belt at risk from speculative development.

Infrastructure

While the consultation documents claim the Preferred Strategy is “infrastructure-led” and that the proposed garden village will have shops, services, etc, the Preferred Strategy makes no commitments regarding either new services or infrastructure. On the contrary, the Preferred Strategy states that delivery will be a “significant challenge”.

We could find no specifics regarding how and to what extent the capacity of retail and other private services will be increased to support the amount of development envisioned by the Preferred Strategy or the proposed garden village. Similarly for public and social services.

The 2015 infrastructure studies are no more than a partial audit of what exists, with numerous omissions and little assessment of existing capacity utilisation or indicative costs or timelines for increasing capacity. The 2015 Retail studies confirm gaps in what is currently available in Tandridge and the consequent dependence on other districts to fill these gaps. The 2017 Sustainability Appraisal for the garden village sites highlights further examples, including relying on hospitals in adjoining Reigate and Banstead that are already operating at full capacity, even before new developments have been completed in Reigate and Banstead.

We are very concerned that the poor quality analysis and continued delay in identifying specifics means that no new services or infrastructure capacity will actually be delivered for any part of the Preferred Strategy. This will leave current and future residents competing with each other for access to ever scarcer services and infrastructure, including, but not limited to, GPs, hospitals, social services and schools, some of which are located in other districts. This is detrimental to both local communities and the communities in other districts.

Settlement Hierarchy

As we have explained in our previous representations, the Settlement Hierarchy Methodology ignores the travel to work patterns, reliance on the car, over-states the amount of local employment and the type and availability of local shops, services and infrastructure, and does not take into the accessibility, location or capacity of public transport, such as railway stations and railway services.

The result of this incorrect Settlement Hierarchy Methodology is that Woldingham is rated as “sustainable” when, in fact, it is not, because residents have no practical choice but to travel by car to other areas in order to access employment, essential services and other services necessary for day to day living – both within and outside of Tandridge.

Contrary to the results in the Settlement Hierarchy, Woldingham has no chemists, GP surgeries, or other health or medical provision, and no comparison shops such as clothing, furniture, household goods, or hardware shops. Woldingham has very limited mains drainage, which was recognised in previous Tandridge local plans as a constraint on development. However, neither this fact nor any of the other constraints are mentioned in either the Settlement Hierarchy or in the 2015 infrastructure studies. There is very limited local employment, and so many residents commute out of Woldingham, often by car.

These are just some of the reasons why Woldingham has never been considered an appropriate location for development in any previous Tandridge planning policy documents. Nothing in Woldingham or in the NPPF has changed to make Woldingham “sustainable”. We once again request that the incorrect Settlement Hierarchy Methodology and the results be amended so that Woldingham is no longer considered “sustainable.”

Green Belt Assessments

Protecting the Green Belt was the top priority of Woldingham residents surveyed as part of the Woldingham Neighbourhood Plan. We believe that the Preferred Strategy and the proposed garden village threaten the Green Belt throughout Tandridge.

The threat is increased because the Green Belt Assessments around Woldingham understate the number of purposes fulfilled by the Green Belt. Green Belt Assessments that fully reflect the strong performance of the Green Belt around Woldingham are essential to helping ensure that these areas can withstand speculative applications should Tandridge District Council not have a five year housing land supply. We request that the Green Belt Assessments for Woldingham be amended as explained in our previous representations.

Conclusion

The Preferred Strategy seeks to build new houses in the Green Belt, including on the proposed garden village sites, for artificially high levels of projected net inward migration that has no connection to Tandridge. There is no assessment of local housing need, despite claims that the garden village will “provide much needed homes for local people.” The new development would be achieved by releasing large amount of Green Belt land for inward migration including at the proposed garden village sites.

The objectives do not reflect the distinctive characteristics of Tandridge -- vast swathes of open countryside, high quality landscapes, biodiversity areas and other natural assets – which are enjoyed by local residents and visitors. Despite protection for these unique characteristics being integral to the NPPF, the balance in the objectives and in the Preferred Strategy is tilted firmly away from optimising and enhancing these important, distinctive characteristics. Instead, as the supporting documents explain, the Preferred Strategy and the garden village is actively detrimental to them -- both within and outside of Tandridge. We believe that this approach is contrary to the NPPF.

We can see no “community benefit” that could possibly outweigh these adverse impacts or the protection for these characteristics in the NPPF, and so we would like to register our strong objection to the Preferred Strategy.

Lastly, we once again request that the Settlement Hierarchy Methodology and the Green Belt Assessments be amended as described in our previous representations.

Thank you for the opportunity to participate in this consultation.

Yours Sincerely,

Geoffrey King
Chairman, on behalf of the Woldingham Association Standing Committee