

Oxted & Limpsfield Residents Group Representation on the Regulation 18 Tandridge District Local Plan – Sites Consultation

1.0 Introduction and Summary

This representation to the Regulation 18 Tandridge District Local Plan – Sites Consultation is submitted to Tandridge District Council by Oxted & Limpsfield Residents Group (a residents' association with more than 2,600 members, from Oxted and Limpsfield and across Tandridge). It also has two Tandridge District Councillors.

This representation is in addition to, and should be read in conjunction with Collective Regulation 18 Representation and the OLRG Representation submitted to the Council's Local Plan Issues and Approaches Regulation 18 Consultation which took place earlier this year.

The submission and Appendices 2 – 5 has been compiled on behalf of the Oxted & Limpsfield Residents Group by Tony Fullwood MRTPI (Tony Fullwood Associates). Appendix 1 draws upon work on behalf of Oxted & Limpsfield Residents Group undertaken by Robin Miller (Understanding Data). The submission has been reviewed for consistency with the legal framework by Paul Brown QC.

The representation first examines the context for sites consultation (Section 2). Section 3 examines the supporting evidence and detailed comments on this important suite of supporting documents are included in the Appendices. The Sustainability Appraisal is reviewed in Section 4. Comments on the Regulation 18 Sites Consultation Local Plan are set out in Section 5 and a conclusion is included at Section 6.

In Summary

- The Sites Consultation is being conducted in the absence of any strategic context. Effectively, the document is no more than a partially complete Strategic Housing and Economic Land Assessment. For this reason, comments on specific sites should not be used to represent local views on the acceptability of their release from the Green Belt or on the alteration of the Green Belt boundaries.
- It appears to continue to be predicated on an inflated and unreliable objectively assessed housing need figure.
- The Sites Consultation document consistently misses out the part of the definition of sustainable development set out in Paragraph 14 of the NPPF which states that local authorities should meet objectively assessed needs unless specific policies in the Framework (including the Green Belt) indicate development should be restricted. This part of the definition was also omitted from the Council's earlier Issues and Approaches Regulation 18 consultation and despite assuring respondents to that consultation that it would not be omitted again, the omission has been repeated in

the Sites Consultation. This is of major concern to the Oxted & Limpsfield Residents Group and other similar groups in the future planning of Tandridge District.

- The Green Belt Assessment Part 2 is flawed and has not been carried out in line with Government policy. The definition of Green Belt Areas for Further Investigation has not been sufficiently justified and this has led to an imprecise and inaccurate analysis of the green belt purposes performed by specific areas of the Green Belt promoted for development.
- In assessing suitability, the HELAA 2016, as with the HELAA 2015, does not meet the requirements of Government guidance and omits key evidence. The assessment should assess site suitability for development and in doing so should take into account all factors identified by Government which are clearly not included in the Tandridge District HELAA even though evidence is available. There is no point stating that the HELAA is only one part of the evidence base that the Local Plan will take into account as the HELAA should contain the synthesis of this information as required by Government.
- The Sustainability Framework incorrectly interpreted some impacts on sites in Oxted based on evidence and requires amendment in order to form a robust basis for assessing sustainability.
- The findings of the Surrey Landscape Character Assessment have not been properly taken into account .

The Collective's representations to the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation were designed to assist the District Council in producing a sound Local Plan but the position has not been corrected since the Issues and Approaches Consultation. Until that happens, the emerging documents should NOT form the basis for assessing site options or the long term planning strategy for the District as stated previously in the Collective Representation and reaffirmed with this representation to the Sites Consultation.

2.0 Context for Sites Consultation

The consultation taking place is currently predicated on an inflated and unreliable objectively assessed housing need (OAN) figure. The Council itself submitted extensive evidence to this effect at the Whyteleafe Road Inquiry in 2014. An up to date and robust evidence base for the objectively assessed housing need of Tandridge District to 2033 is fundamental to the planning strategy for the district. Such is its importance, the Oxted & Limpsfield Residents Group have prepared a response to the District Council's response to the Collective Representation on the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation (see Appendix 1). This reiterates the flaws in both the assumptions and the calculations that underpin the proposed OAN which make it an unreliable basis for preparing a sound Local Plan.

The consultation is also taking place in the absence of any transparent or clearly expressed planning strategy for Tandridge District. There are glimpses of a pre-determined strategy such as at Paragraph 3.3¹ but these are never explicit and are tantalisingly few and far between. This is not the appropriate context for a consultation such as this.

The Sites Consultation and related documents do not identify any exceptional circumstances relating to any of the sites meeting Green Belt purposes that would justify their removal from the Green Belt. Such exceptional circumstances as might exist will apparently come to light in subsequent 'tests for exceptional circumstances following the Sites Consultation.

The consultation on sites is being conducted in a vacuum of strategic planning. Effectively, this document is no more than a Strategic Housing and Economic Land Assessment. Thus comments on sites are provided in the absence of any strategic context and so should not be used to represent local views on: the future use of any of the sites for housing development, the release of any of the sites from the Green Belt or, the alteration of the Green Belt boundaries.

3.0 Supporting Evidence Base

The evidence base contains documents which are not considered to be robust. It should not be the role of a public consultation to highlight all of the flaws in all of the documents, and so in addition to the Objectively Assessed Needs Study (see Appendix 1), comments are made on the Housing and Economic Land Availability Assessment (HELAA), 2016 (see Appendix 2); Green Belt Assessment Part 2: Areas for Further Investigation, 2016 (see Appendix 3); Landscape Capacity and Sensitivity Study, 2016 (see Appendix 4) and Site Based Ecology Assessments, 2016 (see Appendix 5). The consequence of all of the above is that the emerging Local Plan documents are not justified.

4.0 Sustainability Appraisal

4.1 Methodology

The sustainability appraisal is a key piece of evidence in determining the strategy for the final Plan and considering site allocation options within the Plan.

It is noted that the Sustainability Appraisal does not assess the effects of sites on the Green Belt at this stage but that it is anticipated that this will be presented in the Environmental Assessment accompanying the Regulation 19 Local Plan. However, it would not be

1

3.3 ...Individual sites are the conventional way of delivering development and will be the main source of providing for homes and employment in any Local Plan process and can usually be more easily accommodated in an area without having a sudden and significant impact upon the aesthetic qualities of a settlement.

appropriate to consider such impacts within the Landscape objective as Green Belt designation is not for landscape reasons.

Paragraph 3.10.2 of the Sustainability Appraisal states that *Oxted contains 24 sites allocated for housing*. However, other documents make it clear that no decisions have been made in terms of site allocations.

4.2 SA Framework

The Oxted and Limpsfield Residents Group has assessed in detail the framework in the light of current evidence. There are a number of inconsistencies between similar sites and anomalies with the evidence available. OLRG disagrees with both the framework and the conclusions as follows:

SA Objective 2 - To facilitate the improved health and wellbeing of the whole population

Sites resulting in the loss of public open space and which have poor access to GP and or hospital services (such as OXT 052) should score a Likely strong adverse effect on this Objective. As all sites in Oxted are served by only one GP surgery, it is difficult to understand how the allocation of houses in the settlement will improve access to health provision; reduce crime; help reduce social exclusion etc. At best this can be scored as uncertain impact at this stage.

SA Objective 4 - To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities

The Statement of Consultation confirms that the Council is relying on jobs located outside the District to underpin the proposed objectively assessed need for housing. The evidence shows that the vast majority of commuting is undertaken by the car. In addition, higher order retail, leisure and hospital services are all found outside the town. There can therefore be no justification for recording a Likely strong positive effect for this Objective. Even a Likely positive effect is questionable in relation to this objective for sites in Oxted particularly in terms of the cumulative effect of sites. Given the lack of local jobs and the absence of higher order services to meet the proposed OAN, the appraisal should be amended.

Objective 6 - To support economic growth which is inclusive, innovative and sustainable

As above, the Council is relying on jobs outside the town and district to sustain the proposed OAN. There can therefore be no justification for recording a Likely strong positive effect for this Objective. Even a Likely positive effect is questionable in relation to this objective for sites in Oxted particularly in terms the cumulative effect of sites. Given the lack of local jobs, the appraisal should be amended.

Objective 7 -To provide for employment opportunities to meet the needs of the local economy

The SA describes all these sites as being assessed for housing rather than economic development. None of the sites can therefore provide for employment opportunities and at best this would result in a neutral effect in relation to this objective.

Objective 9 -To use natural resources prudently

It is unclear how any of the Decision aiding questions can be answered with any certain positive effects at this stage and should be scored as uncertain effects. In fact, the loss of Grade 3² agricultural land in relation to greenfield sites OXT 007; OXT 020; OXT 021; OXT 022; OXT 025; OXT 034; OXT 035; OXT 040; OXT 046; OXT 048; OXT 053; OXT 059; OXT 061 and OXT 063 would represent a Likely negative impact.

Objective 11 - To reduce flood risk

As Oxted Sites (OXT 006; OXT 007; OXT 021; OXT 034; OXT 035; OXT 052; OXT 059; OXT 065) contain areas at high risk of surface water flooding they should be scored as Likely negative impact for this reason.

Objective 14 -To ensure air quality continues to improve and noise and light pollution are reduced.

Sites OXT 006 and OXT 007 are close to the motorway where air quality and noise are issues. In addition OXT 007 is located close to the railway line. The sites should be scored as having a Likely negative impact on this objective (similar to OXT 035).

Consistent with OXT 059, the proximity of sites OXT 040; OXT 053; OXT 061 and OXT 063 to the railway is likely to result in a Likely negative impact on this objective.

Objective 15 - To protect and enhance landscape character

Site OXT 006 is located within the setting of the AONB and is visible from it. Site OXT 007 is visible from the AONB. Para 3.10.23 of the SA states that rural sites to the north and east of Oxted are in the Greensand Valley LCA. The Surrey Landscape Character Assessment states in its guidelines for built development that development in this area should seek to avoid urban coalescence. It also sets a guideline to improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement. Site OXT 006 is particularly important in avoiding the coalescence of the distinctive urban areas of Oxted and Limpsfield. Development of either site OXT 006 or OXT 007 would not protect and enhance the landscape character areas; protect the AONB; protect significant views; protect and enhance landscape character; protect the urban fringe or protect the open countryside. For these reasons, there will be a Likely negative impact on this objective consistent with other edge of town sites assessed.

Objective 16 - To conserve and enhance biodiversity

The Site Based Ecology Assessments, 2016 shows that there would be Likely strong adverse effects on the habitats of sites OXT 034; OXT 046; OXT 059 and OXT 063.

Amendments are required to the Sustainability Appraisal Framework by the consultants at the next iteration associated with the Regulation 19 Local Plan.

² Para 2.5.17 of the SA confirms that all Grade 3 land is assumed to be Grade 3a i.e. best and most versatile

5.0 Comments on the Regulation 18 Sites Consultation Local Plan

5.1 The Importance of the Green Belt

The Sites Consultation Local Plan appears to consistently miss part of the definition of sustainable development (**highlighted below**) as set out in Paragraph 14 of the NPPF.

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.**

Thus Paragraph 1.7 of the Regulation 18 Sites Consultation Local Plan states:

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.

In the Issues and Approaches Regulation 18 Consultation, this part of the definition was also missing and this omission was raised by a number of respondents. On page 960 of its Statement of Consultation response, the omission is accepted and the Council states that in future it 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. Despite this assurance, the same omission appears again in the Sites Consultation document.

The absence of reference in the emerging Local Plan to the specific policies in the Framework (including the Green Belt) which indicate development should be restricted is of great concern. Put simply, if clear policies in the Framework (including the guidance on Green Belt) indicate that development should be restricted, that development is not “sustainable” within the meaning of Paragraph 14. This clear Government advice appears not to be given weight in the future planning of Tandridge District.

Paragraph 1.8 of the Regulation 18 Sites Consultation Local Plan states:

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.

Leaving aside the fact that there is no inevitable conflict between protection of the Green Belt and sustainable development, it is difficult to understand what ‘practicably possible’ means in this context. It is practicably possible to release large amounts of Green Belt, but only at a very significant cost. More importantly, although providing homes, jobs and infrastructure is undoubtedly very important, the one thing it does not do is overcome the need for the circumstances which justify the release of Green Belt land to be exceptional. In other words, in determining the most appropriate planning strategy for the District (a test of soundness) the planning balance is firmly in favour of the retention of the Green Belt.

It is noted that the Sustainability Appraisal does not assess the effects of sites on the Green Belt at this stage and the absence of this test in the Council’s consideration of impacts of development tends to reinforce the perception that the purposes and permanence of the Green Belt are unimportant.

The NPPF states that Green Belt boundaries can only be altered where exceptional circumstances exist. On its own, the suitability of a site for housing is unlikely to amount to an exceptional circumstance. Similarly, unmet housing need does not on its own constitute an exceptional circumstance justifying development in the Green Belt. The District Council has not identified any exceptional circumstances to support the deletion of the Green Belt.

5.2 Site Categorisation

All of the individual sites considered in this document have been arranged into three categories using the Green Belt Assessment (Part 2): Areas for Further Investigation (2016). The purpose of site categorisation is confusing.

It is clear that Category 1 comprises Sites not in the Green Belt. Category 2 represents Green Belt sites within an Area for Further Investigation which demonstrate at least one of the Green Belt purposes as set out in the NPPF. Category 3 represents Green Belt sites which meet any of the Green Belt purposes and are located outside of Areas for Further Investigation. Such sites with Green Belt value should be retained within the Green Belt as permitted by Paragraph 14 of the NPPF.

Within each of the three categories sites have had a colour attributed to them based on how they have performed against other evidence, namely landscape and ecology. This is a very limited and inappropriate basis for the categorisation of sites. The HELAA should provide a more holistic approach in accordance with Government Guidance (but does not – see comments on HELAA).

5.4 Individual Sites

Category 1: Sites not in the Green Belt

<p>OXT 016 - Oxted Gas Holder, Station Road East OXT 065 - Ellice Road Car Park, Amy Road OXT 067 (ENA 7) -Warren Lane Depot</p>

Oxted and Limpsfield Residents Group accept that OXT 016 is suitable for residential development.

OXT 065 is Oxted's main car park both for the shops and for people using the GP surgery. There is already inadequate parking in Oxted and much concern among residents and businesses about this car park being sold by the Council for housing development and that this could happen before the new Local Plan is adopted. If the Council intends to proceed, then parking facilities should be made available elsewhere which fully compensate for the loss of Ellice Road, and ideally improve on it, and those facilities should be made available before usage of the site is altered. The loss of parking is likely to damage the viability of local shops and have an adverse consequence on the sustainability of Oxted.

Oxted and Limpsfield Residents Group recognise that OXT 067 may be appropriate for residential development but point out that this would mean the loss of another employment site in Hurst Green which has already seen substantial loss of employment land with the redevelopment for housing of the former Fairview industrial estate which has considerably added to the existing infrastructure deficit.

OXT 052 - Boulthurst Way Open Space, Hurst Green

Oxted and Limpsfield Residents Group do not accept that these important public open spaces are suitable for residential development (see Open Space Study).

Landscape Evidence

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Public Open Space

The impacts on public open space should be appraised both strategically and locally (in accordance with the NPPF, Paras. 73 – 74). Para 74 states that existing open space, including playing fields, should not be built on unless a number of criteria are met including an assessment having been undertaken which clearly showed the open space to be surplus to requirements. In fact, the findings of the Local Plan evidence base (Open Space Assessment, 2015) indicate that the quality and value of playing fields/ recreation grounds was generally very high. The Study concludes:

No open space was found to be 'surplus to requirement'. All designated open spaces should be protected with a presumption against development, unless the spaces are not required by the identified open space standards (quantity, accessibility and quality) to meet the needs of the population (Para. 7.2.1).

This Approach is contrary to the Sport England’s planning objectives to seek to protect sports facilities from loss as a result of redevelopment.

The Approach also appears to contradict the emerging Local Plan Vision which states: *Our District will be a place with green and open spaces to support the health and wellbeing of the community.*

Conclusion

The site should not be assessed as suitable for further housing development for the reasons set out above.

OXT 068 - Chestnut Copse Open Space

Public Open Space

The impacts on public open space should be appraised both strategically and locally (in accordance with the NPPF, Paras. 73 – 74). Para 74 states that existing open space, including playing fields, should not be built on unless a number of criteria are met including an assessment having been undertaken which clearly showed the open space to be surplus to requirements. In fact, the findings of the Local Plan evidence base (Open Space Assessment, 2015) indicate that the quality and value of playing fields/ recreation grounds was generally very high. The Study concludes:

No open space was found to be ‘surplus to requirement’. All designated open spaces should be protected with a presumption against development, unless the spaces are not required by the identified open space standards (quantity, accessibility and quality) to meet the needs of the population (Para. 7.2.1).

This Approach is contrary to the Sport England’s planning objectives to seek to protect sports facilities from loss as a result of redevelopment.

The Approach also appears to contradict the emerging Local Plan Vision which states: *Our District will be a place with green and open spaces to support the health and wellbeing of the community.*

Conclusion

The site should not be assessed as suitable for further housing development for the reasons set out above.

Category 3: Green Belt Sites outside Areas for Further Investigation

OXT 006 - Land adjacent to Oxted and Laverock School

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The site immediately abuts the Area of Outstanding Natural Beauty and forms part of its setting. Development of this site would have a significant adverse effect on that setting and views in and out of the AONB, including views from the North Downs Way. There is intervisibility with the important Greensand Way Trail which passes to the east of the site and development would urbanise this area of open countryside. The Landscape Capacity and Sensitivity Study, 2016, identifies the visual sensitivity of the site as Substantial.

Part of the guidance for built development in the Surrey Landscape Character Assessment - Tandridge District, 2015 is to '*improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.*' Development of this narrow green wedge which separates the distinctive built up areas of Oxted and Limpsfield would fail to recognise this and result in the neighbouring urban areas merging and would not be sympathetic to the wider pattern of settlement.

There was long standing usage of the site by walkers, dog walkers and pupils of St Mary's junior school until blocked by the landowner. In November 2013, 74 residents gave statements of long standing usage for two right of way applications across the field which have been submitted to Surrey County Council and should be decided next year.

This is a key green space for the community. It is at the edge of a large housing estate, next to two junior schools, St Mary's and Downs Way, and to Oxted School which is the largest secondary school in Surrey.

The Sites Consultation correctly identifies the ancient woodland and TPOs. The woodland at the north edge protects Oxted from M25 noise and air pollution.

Ecology Evidence

The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the Sites Consultation.

Setting of Heritage Asset

The site forms part of the setting of two Grade II listed churches.

Flood Risk Evidence

In relation to flood risk, the site suffers from frequent surface water flooding and contains an area at high risk of surface water flooding.

Access

Access would be via roads that are already very heavily congested, especially at peak times with school traffic. St Mary's and Down's Way Schools are to merge and increase their intake. Traffic volume and congestion in this location are therefore set to increase substantially. A new side road and junction would create even more severe congestion and unacceptable safety hazards.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for housing development for the reasons set out above. The site should be considered as public open space to serve the surrounding housing development and adjoining schools. This would retain the openness of the site and allow the purposes of the Green Belt to continue to be met. In addition, such a designation would show the local planning authority planning positively to enhance the beneficial use of the Green Belt, by looking for opportunities to provide access; opportunities for outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity (in accordance with NPPF Para 81).

OXT 007 - Land adjacent to The Graveyard and St Mary's Church, Oxted

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

There is intervisibility with the North Downs AONB and development of this large site would have an adverse effect on its setting.

The site is overlooked by several areas of National Trust land.

Part of the guidance for built development in the Surrey Landscape Character Assessment - Tandridge District, 2015 is to '*improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.*' Development of this green wedge which separates distinctive residential areas of Oxted would fail to recognise this and result in the neighbouring urban areas merging and would not be sympathetic to the wider pattern of settlement.

The site has significant community value and provides access to the open countryside for local residents, particularly young families, from the surrounding housing area and is itself very widely used for recreational purposes. A right of way/bridleway crosses the site and is used for walking, horse riding, running, dog walking and cycling. The busy bridle path is used regularly by the local riding stables.

The site borders one of the main housing estates in Oxted. The houses on this estate are mainly owned by young families with school age children and the site provides an important amenity for these families.

The Sites Consultation correctly identifies the TPO's and ancient woodland on and adjoining the site.

OLRG consider that the Landscape Sensitivity of this site is Substantial.

Setting of Heritage Asset

The site contributes to the setting of the Grade I listed St Mary's Church which is mentioned in the Domesday Book and was built nearly one thousand years ago. The church tower dates back to the 12th Century. The chancel is 13th Century, the South and North aisles 14th and the entrance is 15th. Together with its historic graveyards, the church provides a unique home for the key moments and memories of Oxted. The churchyard is circular, containing what are thought to be 2 Crusaders' graves. They have a cross on top and are next to the West wall. As well as forming the setting of a Grade 1 listed building, the site offers some tranquillity to the St. Mary's church burial ground.

Flood Risk Evidence

In relation to flood risk, the site suffers from frequent surface water flooding and contains areas at high risk of surface water flooding.

Area of High Archaeological Potential

The Sites consultation correctly identifies part of the site as an Area of High Archaeological Potential. Local children enjoy collecting the large amounts of fossils that scatter the area after harvesting of crops, some have been dated back millions of years and local schools have exhibited their fossils in the past..

Ecology Evidence

The site immediately abuts a draft Site of Nature Conservation Interest to the south (see comments on Ecology Study, 2016). A survey of The Bogs by Surrey Wildlife Trust carried out in 2007 recommended it be made an SNCI as it is an important piece of wet woodland, rare in Surrey. Water flowing down off the North Downs is an important source for The Bogs wet woodland which may be harmed by development of this site.

The woodland fringe and wetland area of the site are home to some important trees/shrubs and wildlife.

Access

Barrow Green Road is narrow (a large part of it without pavements) and already heavily congested. It has well documented issues with quarry lorries accessing Chalkpit Quarry and, although the quarry is currently closed, it may reopen at any time. Access from Wheeler Avenue is equally problematic and would mean large amounts of traffic attempting to feed into the congested Church Lane which already has problems with access on to the A25.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for housing development for the reasons set out above.

020 - Land at Pollards Wood Road, Hurst Green

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Flood Risk Evidence

In relation to flood risk, the site suffers from frequent surface water flooding.

Ecology Evidence

The broadleaf woodland and woodland stream have ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the Regulation 18 Sites Consultation.

Conclusion

The site at the edge of Limpsfield fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 021 - Land west of Red Lane, Hurst Green, Oxted
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Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald

Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology Evidence

The site has a linear woodland margin which has ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the Regulation 18 Sites Consultation.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 22, 24, 54, 55, 56

Of the five adjacent Limpsfield sites, four are currently well spaced buildings in large plots along the south side of the A25 Westerham Road to the junction with Wolfs Row and one is accessed via Wolfs Row, the latter being in the Limpsfield Conservation Area.

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The sites are located within the Green Belt and continue to fulfil several Green Belt purposes.

Landscape Evidence

Large detached houses are set in large plots situated back from the road and well screened by trees and hedges. Wooded hillside. St Michael's and Thornhill are set within extensive landscaped grounds.

There are limited glimpses of the AONB. The heavily landscaped sites provide a gap between Oxted and Limpsfield.

Ecology Evidence

The area contains significant areas of mature woodland and meadow grassland which provides supporting habitat to the adjoining Limpsfield Common SNCI. The ecological sensitivity of the sites results in a low housing capacity for the sites although the Regulation 18 Sites Consultation does not reflect the net developable area or capacity of the Ecology Study.

Setting of Heritage Assets

The sites provide part of the setting of the Limpsfield Conservation Area and the listed buildings in Wolfs Row and the Grade II listed St. Michael's apartments

Conclusion

Alongside fulfilling Green Belt purposes, the sites should not be assessed as suitable for further housing development.

025 - Land at Holland Road, Hurst Green

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The Landscape Capacity and Sensitivity Study, 2016 concludes that the Visual Sensitivity of this site is Substantial.

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

The site has significant community value and provides access to the open countryside for local residents from the surrounding housing area. A right of way runs through the centre of the site and is used for walking, dog walking and running.

Ecology Evidence

The site has boundary trees and hedgerows which have ecological value as part as the local network of woodland habitats including adjoining Ancient Woodland and should be retained.

The site is close to a Biodiversity Opportunity Area. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the Regulation 18 Sites Consultation.

Access

The presence of two footpaths should be noted as a constraint.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for further housing development for the reasons set out above.

OXT 034 - Land adjoining St Mary's Church, Oxted

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 035 - Land at Chalkpit Lane Oxted adjacent to the railway line

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 040

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 046 - Land at Jincox Farm Cottage, Hurst Green

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 048 - Land adjacent to Brickfield Cottages, Red Lane, Oxted

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology Evidence

The site has boundary woodland and adjacent pond which have ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the Regulation 18 Sites Consultation.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 053 - Land at Holland Road, Hurst Green

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 059 - Land off Holland Road and Merle Common Road

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 061 - Land at Diamond Farm, Holland Road, Hurst Green

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The site is located within the Green Belt and continues to fulfil several Green Belt purposes.

Landscape Evidence

The site is located adjacent to an Area of Great landscape Value.

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology Evidence

The site is not suited for development if access has to be taken from Hollow Road given the loss of mature trees. Woodland and hedgerows should be protected. The site is close to ancient woodland.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 063 - The former brickworks, Red Lane, Limpsfield

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

Additional sites: Land south of Springfield, east of Beadles Lane, Old Oxted and Land at Holland Road, Hurst Green

These two sites have been included in the HELAA Appendix 8 – Additional Sites for HELAA 2017.

Oxted & Limpsfield Residents Group understands that neither of these has been assessed or mapped and there is no landscape or ecology evidence available from the Council.

Land south of Springfield, east of Beadles Lane, Old Oxted is located between the Old Oxted Conservation Area and the Broadham Green and Spring Lane Conservation Area and serves a very important purpose as a setting for both of these areas.

Both sites continue to fulfil several Green Belt purposes and should not be assessed as suitable for housing development.

6.0 Conclusion

The Sites Consultation document is not soundly based because it is not sufficiently justified in line with national policy.

- The Sites Consultation is being conducted in the absence of any strategic context. Effectively, the document is no more than a partially complete Strategic Housing and Economic Land Assessment. For this reason, comments on specific sites should not be used to represent local views on the acceptability of their release from the Green Belt or on the alteration of the Green Belt boundaries.
- It appears to continue to be predicated on an inflated and unreliable objectively assessed housing need figure.
- The Sites Consultation document, as did the earlier Consultation, wrongly paraphrases the definition of sustainable development set out in Paragraph 14 of the NPPF which states that local authorities should meet objectively assessed needs unless specific policies in the Framework (including the Green Belt) indicate development should be restricted.
- The Green Belt Assessment Part 2 is flawed and has not been carried out in line with Government policy. The definition of Green Belt Areas for Further Investigation have not been sufficiently justified and this has led to an imprecise and inaccurate analysis of the green belt purposes performed by specific areas of the Green Belt promoted for development.
- In assessing suitability, the HELAA 2016, as with the HELAA 2015, does not meet the requirements of Government guidance and omits key evidence. The assessment should assess site suitability for development and in doing so should take into account all factors identified by Government which are clearly not included in the Tandridge District HELAA even though evidence is available. There is no point stating that the HELAA is only one part of the evidence base that the Local Plan will take into account as the HELAA should contain the synthesis of this information as required by Government.
- The Sustainability Framework incorrectly interpreted some impacts on sites in Oxted based on evidence and requires amendment in order to form a robust basis for assessing sustainability.
- The findings of the Surrey Landscape Character Assessment have not been properly taken into account .

All of this means the Regulation 18 Tandridge District Local Plan – Sites Consultation and supporting evidence is not fit for purpose for developing a sound Local Plan.

1.0 Summary of Response to the Council's Statement of Consultation

The standard SNPP projections and the Council's evidence presented at the Whyteleafe Road Caterham Public Inquiry in 2014 show that net inward migration comprises the vast majority of the projected population change in Tandridge. The Council's response and evidence included in the 2015 Regulation 18 consultation and also put forward at the Whyteleafe Road, Caterham, Public Inquiry indicate that there are no economic drivers for high levels of inward migration. This is also explained in Appendix 2 of the Collective Representation.

The Council's response explains that the proposed OAN figure includes a significant element of inward migration that comprises "life style choice". Such life style choices fall into the category of "need as aspiration" which the PAS OAN Technical note explains represent an amount in excess of need. Lifestyle choices are also not specific to Tandridge because there are any number of districts that can offer similar lifestyle choices.

There does not appear to be a Council's response to the assertion in the Collective Representation Appendix 2 - supported by the SHMA papers published in the previous Regulation 18 consultation - that unmet need arising in other districts due to under-provision in those districts is also included in the past migration data for Tandridge District. The OAN paper published in the previous Regulation 18 consultation confirms that migration and house-building are linked, and so past high levels of house-building in Tandridge have inflated past inward migration trends into Tandridge. The Council's other SHMA documents also explain that the under-provision in other districts also appears to have suppressed outward migration from Tandridge.

The combination of all of these factors has resulted in artificially high levels of net inward migration which have been used in the calculation of the ten-year average, and this has resulted in artificially high levels of net inward migration being included in the proposed OAN figure. The Council's assertion that Tandridge is a component of the HMA of other districts is primarily based on migration data which itself is inflated due to the above factors, and is also not supported by the HMA evidence of those districts who describe the relationship with Tandridge as "*very minor*" or "*very minimal*." Nor is it supported by preparing a SHMA for Tandridge District alone.

The Council's response confirms a reliance on jobs located and created elsewhere, which confirms the assertion made in the Collective Representation that Tandridge will become a dormitory district. The Council's reliance on jobs being created and located elsewhere is contrary to the sustainable development objective of the NPPF because jobs are not located near homes and people will be locked into unsustainable commuting patterns as the evidence shows overwhelming reliance on commuting by car. The assumption that jobs will be created and located elsewhere is another indication that the OAN figure is inflated.

There remain unexplained material discrepancies in the calculations between the OAN paper and the standard SNPP projections, including labour force and changes in population age structure. In conclusion, the Council's response does not overcome the assertions

made in the Collective Representation that the proposed OAN is inflated and not robust and so does not fulfil the requirements of the NPPF or the PPG.

2.0 Detailed Response

This section discusses five areas in detail: Components of Population Change, Age Structure of a population, Net inward migration, Housing Market Area, Economic projections and Material discrepancies in calculations.

2.1 Components of Population Change

The Council's response does not address the point made in Collective Representation Appendix 2 which is that it is the discrepancy between the SNPP projection results and the characteristics of Tandridge district that provides one of the reasons for interrogating the SNPP standard projections in more detail. Page 1281/paragraph 24 of the Council's response states that

“The fact that the projected increase in the population of Tandridge is at a faster rate than Surrey or the South East region does not mean it is too high. The London population is projected to increase faster than Tandridge's – by 22.9% over the same period.”

The evidence base published in the Issues and Approaches Regulation 18 consultation describes Tandridge as a predominately rural district with no recognised economic or population centres and very limited economic growth. In contrast, London, Surrey and the South East have numerous, large population and economic centres and stronger and more diverse economic growth. However, the projected population growth rate is similar for all four areas and so this mismatch between projections results and area attributes should be investigated because cross-checking model results with reality is a routine part of helping ensure that model results are reliable.

The first step of the analysis is to separate the components of population change into the recognised constituents of natural change and migration. However, neither the OAN Paper itself nor the Council's response separates these two components of population change. The results for the 2014 SNPP projections have a pattern similar to previous projection results in that 91% of the projected population change is due to net inward migration.

The Council's response has not addressed the conclusion explained in Collective Representation Appendix 2 that the vast majority of the projected increase in the Tandridge population is due to projected future high levels of net inward migration. The next part of the interrogation is to assess whether the future levels of net migration are a consequence of the projection model or driven by genuine need attributable to Tandridge, such as economic growth in Tandridge.

The issues around past and future migration levels were explored in detail during the Whyteleafe Road, Caterham, Public Inquiry in 2014 where the Council put forward evidence explaining that the projected population growth is due to projected high levels of inward migration:

2.43... The population and household growth is very largely attributed to in-migration which is considered to be a consequence of the district delivering considerably more housing than has been required in the South East Plan (and the Core Strategy- see Table A above).

The past delivery was made possible because of a significant number of large military and health service sites that have come forward (which will not be repeated).....The assessment of future housing need incorporating migration issues with regard to past performance, driven by delivery significantly in excess of the established requirements, resulting from in-migration from outside the district, tends to perpetuate previous patterns in a manner which does not actually specifically consider the local housing needs of the district. Had the Council simply delivered the South East Plan minimum requirement then the statistical level of in-migration would be less, and this when applied to future projections would produce a lower requirement. Thus past performance cannot, in a highly constrained district, be a yard stick for future need.

This extract from the Council's Public Inquiry evidence and Collective Representation Appendix 2 explain that house-building is linked to inward migration. Tandridge experienced very high rates of house-building for more than the last ten years which effectively brought forward development and artificially increased inward migration into Tandridge.

New analysis published in the previous Regulation 18 Consultation referenced in paragraphs 55 and 56 of Collective Representation Appendix 2 indicates that outward migration may also have been suppressed due to under-provision in other districts.

The combination of artificially high inward migration and suppressed outward migration has led to artificially high net migration levels in the past which have been captured and projected into the future in the standard projection results. The ten-year average used in the OAN paper encompasses this past period of unusually high rates of house-building and net inward migration and so these artificially high rates of inward migration would also form a significant part – perhaps more than 90% -- of the OAN figure of 470 dpa.

2.2 Age structure of the population

Despite the above showing that projected high levels of net migration comprise the vast majority of the projected population change, the Council's response incorrectly attributes the majority of projected population change in Tandridge to the increase in the over 60 age groups as shown in paragraph 1281/Paragraph 25:

"It should be borne in mind that nearly 70% of the projected population increase is in the over 60 age groups. Most of these people will therefore already be living in the district."

This contradicts previous statements made by the Council included in the previous section of this appendix and also confuses the recognised drivers of population change (natural change and migration) with the age structure of a population, which is an attribute or characteristic of a population.

The Council may now be aware of this difference because the text of the Council's FAQ published on the Tandridge web-site was changed sometime between the 14 November and the 5 December to remove the assertion that the majority of the population increase is driven by people in the district living longer. This extract from the Council's FAQ published on the Council's web-site was copied by OLRG on the 14th November 2016 [ed: emphasis added]:

Why do we need more houses?

*The largest part of the population increase being planned for is because people are living longer. **A significant part of the population increase can be attributed to people already living in the district living longer.***

In 2014, of a population of about 85,000, 17,000 (20%) of Tandridge residents were aged over 65.

In 2034, that is projected to be 26,000 (26%) of a population of about 100,000.

This reduces the availability of housing in the housing market area and increases the need for people to support the ageing population, for example, doctors and carers.

However, a copy taken on the 4 December shows that the text was changed to remove the phrase asserting that the reason for the population increase in Tandridge is people living longer:

Why do we need more houses?

The population of the UK and especially the South East, is growing. People are also living longer. The population of Tandridge is projected by the government to grow by around 15,000 over the next 20 years.

In 2014, of a population of about 85,000, 17,000 (20%) of Tandridge residents were aged over 65.

In 2034 of a projected population of about 100,000, 26,000 (26%) of Tandridge residents will be aged over 65.

This reduces the availability of housing in the housing market area and increases the need for people to support the ageing population, for example, doctors and carers.

On that basis, it would seem that the Council may have already recognised the difference between components of population change and age structure since the consultation responses were published, and so we omit further explanation at this time.

Page 1296 (paragraph 3.13) of the Council's response states:

This means that an increasing number of homes will be occupied by older people – very largely in homes which they already occupy. Not taking this into account would result in insufficient homes being available for younger households – who would then lose out.

Neither the OAN paper nor the Council's response provide any evidence to support this assertion.

Aging is not a new trend in Tandridge and is also an attribute shared by the populations of many other local authorities and the nation as a whole. The increase in the number of people above retirement age is recognised in the Core Strategy paragraph 2.4 which states:

2.4.....Over the next twenty years there will be a decline in the number of children and a significant decline in the number of people in the 25-44 age group (-29%) and an increase in the number of people above retirement age (50%) as the current 45-64 age group gets older.

Appendix 1: Page 5 of Collective Representation explains that the SHMA: Addressing the Needs of All Households paper shows that younger households in Tandridge (44.7%) are far more likely to own their own property than either in Surrey (38.5%) or the national average (30.5%). In addition, paragraph 53 of Collective Representation Appendix 2 references the SHMA: Analysing Market Signals paper which explains that Tandridge ranks below almost all nearby local authorities for change in overcrowded households and change in concealed families between 2001-2011. All of this casts some doubt on the assertion in the Council's response.

In summary, the Council's consultation response incorrectly attributes the main driver of projected population increase to people living longer when previous evidence put forward by the Council and also the most recent SNPP projections show that the overwhelming majority of the projected population change is due to artificially high levels of inward migration being included in the proposed OAN figure.

3.3 Net inward migration

The Council's responses on pages 1280-1282 indicate that the proposed OAN figure is a composite of inward migration elements that are outside the scope of housing need attributable to Tandridge.

The Council's response confirms that the OAN figure of 470 dwellings per annum (dpa) includes future levels of net inward migration incorporating a significant element of those who make "life style choices" as explained in page 1282/paragraph 32:

It should also be recognised that moves to take up jobs in Tandridge are only part of the inward migration into the area and not necessarily the most significant part. Other reasons will include the life style choices of those employed in London who decide to move out for the environmental and other benefits it offers whilst retaining their jobs in London.

We believe that "life style choice" falls into the category of "need-as-aspiration" which is in excess of housing need attributable to Tandridge as explained in the PAS OAN Technical note referenced in Collective Representation Appendix 2.

The Councils' response also implies that the "life style choice" element of inward migration is both significant and larger than any economic reason for inward migration. In addition, life style choices cannot be attributed specifically to Tandridge because Tandridge is just one of a number of districts that have the capacity to exhibit "environmental and other benefits" provided as a justification for the life style choice.

The Council's response has not addressed the assertions in paragraph 47-58 Collective Representation that the OAN figure also includes:

- Unmet need arising in districts due to under-provision in these districts.
- Inward migration from a very wide range of districts with a considerable geographic spread that are outside of the Tandridge HMA, located far away from Tandridge and which have no relationship with Tandridge, economic or otherwise. Tandridge may have been just one of a number of possible options for those looking to migrate out of those districts, but

there were houses available in Tandridge and not elsewhere (perhaps even in their origin districts), and so this element of need cannot be attributable specifically to Tandridge.

- Suppression of outward migration due to historic under-provision in other districts which is highlighted in Collective Representation Appendix 2 paragraph 55.

In summary, future migration projections comprise the vast majority of the population change in Tandridge which underpins the proposed OAN figure. The Council's response explains that these projections include significant elements that are outside the scope of housing need attributable to Tandridge, such as those migrating due to "life style choice", and so the OAN figure of 470dpa is inflated and not a robust indicator of need in Tandridge.

3.4 Housing Market Area

The Council's response on page 1280/paragraph 20 confirms that Tandridge is the HMA and that even those districts that are geographically close to Tandridge regard the relationship with Tandridge as "*relatively minor*":

the other HMA areas listed regard Tandridge as being a relatively minor part of their HMSs [ed: sic].

The assertions made on page 1280/paragraph 20 that Tandridge is a component of the HMA of other districts is not robust because:

- Tandridge is not included in the now-mostly Examined HMA evidence used in the Local Plans for those districts.
- it is supported primarily by migration data, which is inherently unreliable due to being self-fulfilling and circular. The projections capture the past and project it into future, and so past housebuilding policies and housing delivery are inherently embedded in the future projections. This is explained in the extract from the Council's Public Inquiry evidence included above and also in the PAS OAN Technical note referenced in Collective Representation Appendix 2.

Even considering the inflated migration data, the adjoining districts describe any links with Tandridge as "very minor" or "very minimal" as shown in the Duty to Cooperate discussions referenced in Collective Representation Appendix 2 paragraphs 42 and 43. The reasons for not joint working may be partly due to timing, but in reality are because of a lack of justification as explained in Collective Representation Appendix 2.

3.5 Economic projections

The Council's response confirms that the Council is relying on jobs created elsewhere which confirms the assertion in paragraph 6 of Collective Representation that Tandridge will become a dormitory district. Page 1281/paragraph 31 of the Council's response states:

The size of the resident workforce needed in Tandridge depends not just on the new jobs that are likely to be established in the district but also on the jobs created in surrounding areas (including London) to which the people from the district commute.

and

The size of the resident workforce needed in Tandridge is affected both by the likely increase in employment within the district and in the wider area, which for these purposes has to include London.

The previous sections of this paper explain that the overwhelming driver of the projected population change in Tandridge is inward migration and the Council's response and evidence put forward at the Public Inquiry confirms the absence of economic drivers in Tandridge for these high levels of inward migration.

2.44 The GL Hearn report [ed: commissioned by the Council] makes it clear that growth in housing demand within Tandridge is not driven by new employment growth within the District. As such housing need is not driven by economic factors from within the District instead being driven predominantly by people who are coming into the district but employed in Croydon or London. Migration factors are therefore driven by Tandridge soaking up pressure from neighbouring authorities, and from London. Ultimately the extent to which this is appropriate is a matter to be determined through the review of the Core Strategy and further consideration of the duty to co-operate.

Relying on jobs located and created elsewhere is not sustainable because the evidence base shows that Tandridge commuters rely on the car, as explained in Collective Representation paragraph 36-42. Projected population and household growth that relies on jobs created and located elsewhere will further exacerbate unsustainable patterns of commuting which is unsustainable and so contrary to the NPPF.

The Council's reliance on jobs created and located elsewhere conflicts with the rest of the economic evidence base published in the 2015 Issues and Approaches Regulation 18 Consultation which concludes that Tandridge is a standalone Functional Economic Area and all of the economic studies examine Tandridge on a standalone basis. It also leads to potential double-counting of both current and future jobs as these other districts increase their housing provision to provide more homes near jobs which is expected under the NPPF.

The reliance on jobs created elsewhere to justify the OAN provides a further indication that the OAN figure is inflated because it includes artificially high levels of net inward migration that do not reflect genuine need attributable to Tandridge.

3.6 Material discrepancies in calculations

The Council's response does not address the material discrepancy described in paragraph 62 of Collective Representation Appendix 2 between the labour force projections shown in the OAN paper (8,490) and those in the standard SNPP (3,016).

There is another material discrepancy in the rate of change in the older age groups. The SNPP2014 figures show a population change in the 60+ age groups of 47%. However, page

1281/paragraph 25 extracted above uses a figure of 70%. The difference between 47% and 70% is material and so should also be explained.

The lack of transparency in the OAN paper and continued in the Council's response means that it is left to the reader to derive important information such as the relative size of the components of population change, natural change and migration.

3.0 Conclusion

In conclusion, the proposed OAN figure is overwhelmingly driven by projected high levels of inward migration which are inflated because of specific past housing factors as well as the inclusion of significant elements that are outside the scope of need attributable to Tandridge, such as "life style choice".

The Council's response confuses drivers of population change with age structure, but this position may have shifted as shown by revisions to the text of the Council's published FAQ which remove the incorrect statements. Aging is neither a new attribute nor unique to Tandridge. There remain unexplained material discrepancies between the SNPP standard projections and the OAN figures. The OAN figure is both inflated and unreliable and so does not fulfil the requirements of the NPPF/PPG. Further careful analysis and revision is required to support the Regulation 19 Local Plan.

Housing and Economic Land Availability Assessment (HELAA), 2016

1.0 Site suitability, availability and achievability

The HELAA sets out to assess the suitability, availability and achievability of land for development.

Whilst being aware that the HELAA does not allocate sites for development, it is an important assessment in progressing to allocations in an emerging Local Plan. For this reason, it is imperative that the HELAA represents an appropriate proportionate evidence base on which to build a sustainable planning strategy and site allocations.

Government guidance on Assessing the suitability of sites or broad locations for development (Paragraph: 019) states:

Assessing the suitability of sites or broad locations for development should be guided by ...the development plan, emerging plan policy and national policy...

Thus, in relation to sites in the Green Belt, the need to show exceptional circumstances is itself a constraint and is now, correctly, referenced in the assessment. Nevertheless, Paragraph 4.14 of the HELAA makes it clear that existing policy constraints, such as the Green Belt, were not considered to prevent the site from being assessed to be suitable for development. However, the Council's own legal advice (Clare Parry) advises that *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.* This advice is in accordance with Paragraph 14 of the NPPF and should be followed.

Government guidance on Assessing the suitability of sites or broad locations for development (Paragraph: 019) continues:

In addition to the above considerations, the following factors should be considered to assess a site's suitability

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas;*
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.*

In assessing suitability, the HELAA, 2016 does not meet this guidance and omits key evidence. The Collective Representation on the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation did not misunderstand the role of the HELAA and confuse it with either the Local Plan or the assessment of planning applications as the District Council accuses. The assessment should assess site suitability for development and in doing so should take into account all factors identified by Government which are clearly not included in the Tandridge District HELAA even though evidence is available. There is no point stating that the HELAA is only one part of the evidence base that the Local Plan will take into account as the HELAA should contain the synthesis of this information as required by Government.

The Sustainability Appraisal (SA) takes into account more of the factors necessary to assess site suitability but the reasoning behind these judgements is not explained for each site in the SA and this does not eliminate the need for a comprehensive assessment of each site in the HELAA in accordance with Government guidance.

Without the comprehensive assessment required by Government, it is not possible for the HELAA to conclude, as in the majority of cases at Oxted, that: *This site can be considered suitable...* Indeed, the consequence of the incomplete assessment in the HELAA is that it declares sites as suitable for development even though the Local Plan Sites Consultation concludes for the same sites that *Taking into account the available evidence gathered to date, the site is ruled out from further consideration through the Local Plan process and would not be subject to the exceptional circumstances test.*

This is confusing for consultees and it appears that the assessment of site suitability of the Regulation 18 Local Plan Sites Consultation has not been based on the HELAA as envisaged by Government.

2.0 Site Capacity

The District Council's response to the Collective Representation on the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation states that the 2015 HELAA took into account (and will continue to take account as they are refined) relevant limitations that are evidenced and has ruled out or reduced the developable areas of sites based on such issues as far as they were/are currently known.

This has clearly not occurred in the 2016 HELAA and the Regulation 18 Local Plan Sites Consultation where the net developable areas recommended for each site in the Site Based Ecology Assessments – September 2016 are generally ignored.

It would also appear that no adjustments have been made to reflect the landscape sensitivity and value recorded in the Tandridge Landscape Capacity and Sensitivity Study, October 2016. Assessing the effect on landscapes including landscape features, nature and heritage conservation as required by Government should be far more than identifying relevant landscape and heritage designations which the Council appear to assert to be their approach in response to the previous Collective Representation.

The consequence of this is a lack of read-across from the District Council's evidence to the HELAA, and consequently the Local Plan Sites Consultation contains sites with inflated net developable areas and estimated site yields which are too high.

Oxted & Limpsfield Residents Group is pleased to note at Para 4.42 that further consideration will be given to potential yields and determination of net developable areas in future versions of the HELAA but note with disappointment that this will be in liaison with site owners and/or their promoters rather than local residents.

3.0 Windfalls

Oxted & Limpsfield Residents Group support the principle of including a windfall allowance within the District's future housing provision. The Council's view is that the delivery of unidentified small sites in the district has been and will continue to be an integral source of housing supply, and therefore the HELAA should include an estimation of future housing delivery through windfall sites. The Council should therefore be making an allowance for windfall development in the emerging Local Plan.

The Regulation 18 Sites Consultation states that the District has been significantly affected by the government's permitted development rules which allow the conversion of office space to housing. This has only occurred in the past 3 years. The HELAA uses trends from 2006 to 2016 (10 years). This means that prior approvals are included in only 3 of the 10 years (2003 to 2016) used to estimate windfalls in the District. This may have been appropriate if such permitted development rights were limited to three years as the Government originally proposed. However, such rights were made permanent on 6 April 2016 with clear implications for potentially increasing the future delivery of homes in Tandridge District. Oxted & Limpsfield Residents Group consider it appropriate to include an element which more realistically reflects prior notification approvals in the future windfall supply. Oxted & Limpsfield Residents Group considers the proposed use of 28 dwellings per year on residential developments of less than 5 dwellings to be too low to reflect future provision up to 2033.

Oxted & Limpsfield Residents Group does not support the omission of sites capable of providing 5 units or more from a windfall allowance for the entire plan period to 2033. The National Planning Policy Framework (NPPF) does not restrict local planning authorities to making an allowance for only very small windfall sites. No evidence is presented in the HELAA of part rates of windfall development on sites of 5 units or more.

Oxted & Limpsfield Residents Group strongly believe that an allowance should be made for sites of 5 or more dwellings in the HELAA and consequently the emerging Local Plan. For larger sites, there are a number of factors that affect the setting of a realistic future rate for large windfall sites: sites have been allocated in the Local Plan, so fewer sites will be "unidentified" in the short to medium term. Whilst the Council states that all larger sites will have come forward through the HELAA process, this is not likely to be the case as circumstances change. Not all landowners' will understand their business plans beyond 5 or 10 years at this stage. Whilst the Council should therefore exercise caution and assumed no large site windfalls of 5 or more dwellings over the next five years, after that it is reasonable to assume that the 'call for sites' exercise would not have revealed all medium to long term

opportunities and so the Council should apply 50% of the average past windfall rate for the next 5 year period and 100% for the latter period.

The Council can be confident that a windfall allowance will continue to come forward. This is justified in part by the presence of strong Green Belt boundaries which lead to the housing market finding opportunities within non-designated areas as demonstrated by past rates.

4.0 Potential Housing Sites

The absence of a comprehensive assessment of the site as required by Government as part of the HELAA leads to the omission of a number of key determinants of the site's suitability for residential development (see also comments on Green Belt). The additional information known to OLRG is set out below for inclusion in the next iteration of the HELAA.

OLRG note the need for an assessment of local infrastructure capacity. There is already a considerable infrastructure deficit including school places, GP provision, public transport and parking. The proposed scale of development that has been assessed for these sites would have an immense and insupportable cumulative impact in an area already under provided with physical, social and green infrastructure.

OXT 006

Suitability

Landscape

The site immediately abuts the Area of Outstanding Natural Beauty and forms part of its setting. Development of this site would have a significant adverse effect on that setting and views in and out of the AONB, including views from the North Downs Way. There is intervisibility with the important Greensand Way Trail which passes to the east of the site and development would urbanise this area of open countryside. The Landscape Capacity and Sensitivity Study, 2016, identifies the visual sensitivity of the site as Substantial.

Part of the guidance for built development in the Surrey Landscape Character Assessment - Tandridge District, 2015 is to '*improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.*' Development of this narrow green wedge which separates the distinctive built up areas of Oxted and Limpsfield would fail to recognise this and result in the neighbouring urban areas merging and would not be sympathetic to the wider pattern of settlement.

There was long standing usage of the site by walkers, dog walkers and pupils of St Mary's junior school. In November 2013, 74 residents gave statements of long standing usage for two right of way applications across the field which have been submitted to Surrey County Council and should be decided next year.

This is a key green space for the community. It is at the edge of a large housing estate, next to two junior schools, St Mary's and Downs Way, and to Oxted School which is the largest secondary school in Surrey.

The HELAA correctly identifies the ancient woodland and TPOs. The woodland at the north edge protects Oxted from M25 noise and air pollution.

Ecology

The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the HELAA.

Setting of Heritage Asset

The site forms part of the setting of two Grade II listed churches.

Flood Risk

In relation to flood risk, the site suffers from frequent surface water flooding and contains an area at high risk of surface water flooding.

Access

Access would be via roads that are already very heavily congested, especially at peak times of school traffic. St Mary's and Down's Way Schools are to merge and increase their intake. Traffic volume and congestion in this location are therefore set to increase substantially. A new side road and junction would create even more severe congestion and unacceptable safety hazards.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for development for the reasons set out above. The site should be considered as public open space to serve the surrounding housing development and adjoining schools. This would retain the openness of the site and allow the purposes of the Green Belt to continue to be met. In addition, such a designation would show the local planning authority planning positively to enhance the beneficial use of the Green Belt, by looking for opportunities to provide access; opportunities for outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity (in accordance with NPPF Para 81).

OXT 007

Suitability

Landscape

There is intervisibility with the North Downs AONB and development of this large site would have an adverse effect on its setting.

The site is overlooked by several areas of National Trust land.

Part of the guidance for built development in the Surrey Landscape Character Assessment - Tandridge District, 2015 is to '*improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.*' Development of this green wedge which separates distinctive residential areas of Oxted would fail to recognise result in the neighbouring urban areas merging and would not be sympathetic to the wider pattern of settlement.

The site has significant community value and provides access to the open countryside for local residents, particularly young families, from the surrounding housing area and is itself very widely used for recreational purposes. A right of way/bridleway crosses the site and is used for walking, horse riding, running, dog walking and cycling. The busy bridle path is used regularly by the local riding stables.

The site borders one of the main housing estates in Oxted. The houses on this estate are mainly owned by young families with school age children and the site provides an important amenity for these families.

The HELAA correctly identifies the TPO's and ancient woodland on and adjoining the site.

OLRG consider that the Landscape Sensitivity of this site is Substantial.

Setting of Heritage Asset

The site contributes to the setting of the Grade I listed St Mary's Church which is mentioned in the Domesday Book and was built nearly one thousand years ago. The church tower dates back to the 12th Century. The chancel is 13th Century, the South and North aisles 14th and the entrance is 15th. Together with its historic graveyards, the church provides a unique home for the key moments and memories of Oxted. The churchyard is circular, containing what are thought to be 2 Crusaders' graves. They have a cross on top and are next to the West wall. As well as forming the setting of a Grade 1 listed building, the site offers some tranquillity to the St. Mary's church burial ground.

Flood Risk

In relation to flood risk, the site suffers from frequent surface water flooding and contains areas at high risk of surface water flooding.

Area of High Archaeological Potential

Part of the site is an Area of High Archaeological Potential. Local children enjoy collecting the large amounts of fossils that scatter the area after harvesting of crops, some have been dated back millions of years and local schools have exhibited their fossils in the past..

Ecology

The site immediately abuts a draft Site of Nature Conservation Area to the south (see comments on Ecology Study, 2016). A survey of The Bogs by Surrey Wildlife Trust carried out in 2007 recommended it be made an SCNI as it is an important piece of wet woodland, rare in Surrey. Water flowing down off the North Downs is an important source for The Bogs wet woodland which may be harmed by development of this site.

The woodland fringe and wetland area of the site are home to some important trees/shrubs and wildlife.

Access

Barrow Green Road is narrow (a large part of it without pavements) and already heavily congested. It has well documented issues with quarry lorries accessing Chalkpit Quarry and, although the quarry is currently closed, it may reopen at any time. Access from Wheeler Avenue is equally problematic and would mean large amounts of traffic attempting to feed into the congested Church Lane which already has problems with access on to the A25.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for housing development for the reasons set out above.

OXT 020

Suitability

Landscape

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees.

Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Flood Risk

In relation to flood risk, the site suffers from frequent surface water flooding.

Ecology

The broadleaf woodland and woodland stream have ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the HELAA.

Conclusion

The site at the edge of Limpsfield fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 021

Landscape

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology

The site has a linear woodland margin which has ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the HELAA.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 22, 24, 54, 55, 56

Of the five adjacent Limpsfield sites, four are currently well spaced buildings in large plots along the south side of the A25 Westerham Road to the junction with Wolfs Row and one is accessed via Wolfs Row, the latter being in the Limpsfield Conservation Area.

Oxted and Limpsfield Residents Group consider the evidence set out in the Regulation 18 Sites Consultation is incomplete and should be supplemented as follows. The Sustainability Appraisal will require consequential adjustments (see comments on Sustainability Appraisal)

Green Belt

The sites are located within the Green Belt and continue to fulfil several Green Belt purposes.

Landscape Evidence

Large detached houses are set in large plots situated back from the road and well screened by trees and hedges. Wooded hillside. St Michael's and Thornhill are set within extensive landscaped grounds.

There are limited glimpses of the AONB. The heavily landscaped sites provide a gap between Oxted and Limpsfield.

Ecology Evidence

The area contains significant areas of mature woodland and meadow grassland which provides supporting habitat to the adjoining Limpsfield Common SNCI. The ecological sensitivity of the sites results in a low housing capacity for the sites although the Regulation 18 Sites Consultation does not reflect the net developable area or capacity of the Ecology Study.

Setting of Heritage Assets

The sites provide part of the setting of the Limpsfield Conservation Area and the listed buildings in Wolfs Row and the Grade II listed St. Michael's apartments

Conclusion

Alongside fulfilling Green Belt purposes, the sites should not be assessed as suitable for further housing development.

OXT 025

Landscape

The Landscape Capacity and Sensitivity Study, 2016 concludes that the Visual Sensitivity of this site is Substantial.

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

The site has significant community value and provides access to the open countryside for local residents from the surrounding housing area. A right of way runs through the centre of the site and is used for walking, dog walking and running.

Ecology

The site has boundary trees and hedgerows which have ecological value as part as the local network of woodland habitats including adjoining Ancient Woodland and should be retained. The site is close to a Biodiversity Opportunity Area. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the HELAA.

Access

The presence of two footpaths should be noted as a constraint.

Conclusion

Alongside fulfilling Green Belt purposes, the site should not be assessed as suitable for further housing development for the reasons set out above.

OXT 034

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 035

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 040

Landscape

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 046

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 048

Landscape

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology

The site has boundary woodland and adjacent pond which have ecological value and should be retained. The ecological sensitivity of the site recorded in the Ecology Study (and consequential net developable area or capacity if the site were otherwise suitable) is not reflected in the HELAA.

Access

The presence of a footpath should be noted as a constraint.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 052

Landscape

The site is located within an Area of Great Landscape Value

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Public Open Space

The impacts on public open space should be appraised both strategically and locally (in accordance with the NPPF, Paras. 73 – 74). Para 74 states that existing open space, including playing fields, should not be built on unless a number of criteria are met including an assessment having been undertaken which clearly showed the open space to be surplus to requirements. In fact, the findings of the Local Plan evidence base (Open Space Assessment, 2015) indicate that the quality and value of playing fields/ recreation grounds was generally very high. The Study concludes:

No open space was found to be 'surplus to requirement'. All designated open spaces should be protected with a presumption against development, unless the spaces are not required by the identified open space standards (quantity, accessibility and quality) to meet the needs of the population (Para. 7.2.1).

This Approach is contrary to the Sport England's planning objectives to seek to protect sports facilities from loss as a result of redevelopment.

The Approach also appears to contradict the emerging Local Plan Vision which states: *Our District will be a place with green and open spaces to support the health and wellbeing of the community.*

Conclusion

The site should not be assessed as suitable for further housing development for the reasons set out above.

OXT 053

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 059

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 061

Landscape

The site is located adjacent to an Area of Great landscape Value.

The site is located within the Low Weald Farmland Character Area of the Surrey Landscape Character Assessment - Tandridge District, 2015. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees. Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Clearly, development of this site would not respect the guidelines from the Council's evidence base.

Ecology

The site is not suited for development if access has to be taken from Hollow Road given the loss of mature trees. Woodland and hedgerows should be protected. The site is close to ancient woodland.

Conclusion

The site at the edge of Oxted fulfils Green Belt purposes which, in addition to the reasons set out above, mean that it should not be assessed as suitable for housing development.

OXT 063

The Landscape Sensitivity and Capacity and Ecology studies should be reflected in the HELAA

Conclusion

Oxted & Limpsfield Residents Group support the site being considered unsuitable for development and ruled out of any further consideration through the Local Plan.

OXT 068

Public Open Space

The impacts on public open space should be appraised both strategically and locally (in accordance with the NPPF, Paras. 73 – 74). Para 74 states that existing open space, including playing fields, should not be built on unless a number of criteria are met including an assessment having been undertaken which clearly showed the open space to be surplus to requirements. In fact, the findings of the Local Plan evidence base (Open Space Assessment, 2015) indicate that the quality and value of playing fields/ recreation grounds was generally very high. The Study concludes:

No open space was found to be 'surplus to requirement'. All designated open spaces should be protected with a presumption against development, unless the spaces are not required by the identified open space standards (quantity, accessibility and quality) to meet the needs of the population (Para. 7.2.1).

This Approach is contrary to the Sport England's planning objectives to seek to protect sports facilities from loss as a result of redevelopment.

The Approach also appears to contradict the emerging Local Plan Vision which states: *Our District will be a place with green and open spaces to support the health and wellbeing of the community.*

Conclusion

The site should not be assessed as suitable for further housing development for the reasons set out above.

Additional sites: Land south of Springfield, east of Beadles Lane, Old Oxted and Land at Holland Road, Hurst Green

These two sites have been included in the HELAA Appendix 8 – Additional Sites for HELAA 2017.

Oxted & Limpsfield Residents Group understands that neither of these has been assessed or mapped and there is no landscape or ecology evidence available from the Council.

Land south of Springfield, east of Beadles Lane, Old Oxted is located between the Old Oxted Conservation Area and the Broadham Green and Spring Lane Conservation Areas and serves a very important purpose as a setting for both of these areas.

Both sites continue to fulfil several Green Belt purposes and should not be assessed as suitable for housing development..

Conclusion

Oxted & Limpsfield Residents Group are astonished that the Council believes that the 2015 HELAA conforms with Government guidance. The Collective submission to the Issues and Approaches Regulation 18 Consultation recognised that the HELAA is an iterative process, whereby sites will be reassessed based on comments provided during the consultation (hence the willingness to make comments), as well as the completion of evidence base documents and information from site promoters/landowners as the Local Plan develops.

The Collective's representations to the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation were designed to assist the District Council in producing a sound Local Plan based on relevant up to date evidence but the HELAA, 2016, is clearly similarly not fit for purpose in assessing sites for allocation.. This position has not been corrected since the Issues and Approaches Consultation. Unless and until the above assessments of suitability are completed comprehensively and in accordance with the up to date evidence available, the HELAA should NOT form the basis for assessing site options or the long term planning strategy for the area as stated previously in the Collective Representation and reaffirmed with this representation to the Sites Consultation.

Green Belt Assessment Part 2: Areas for Further Investigation (GBA) (2016)

1.0 Evidence

This study considers further those areas identified for further investigation by Tandridge District Council who consider that they serve Green Belt purposes less obviously/effectively.

Areas for Further Investigation as defined by Tandridge District Council comprise imprecise ovals often including developed areas which are not in the Green Belt as well as sites specifically promoted for development. The inclusion of development in these randomly shaped Areas for Further Investigation has the consequence of potentially obscuring the important Green Belt purposes which promoted sites perform.

The Green Belt Assessment Part 2 states that it builds on the initial findings of the Green Belt Assessment (Part 1), 2015 and takes forward its recommendations in providing further detailed analysis of those locations which were identified as Areas for Further Investigation. In this process, it appears that the over-arching recommendations of the 2015 study have been supplanted.

Para 2.4 of the Assessment states that the approach to assessing the Areas for Further Investigation takes on board relevant comments that were made through the consultation on the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation. However, the comments made by the Collective Representation in relation to Green Belt purposes and other related matters do not appear to have assisted the evolution of the assessment process in an iterative way as promised and have not been incorporated in the Part 2 Assessment.

Overall, the Oxted and Limpsfield Residents Group consider that

- the definition of the Areas for Further Investigation have not been sufficiently justified and this has led to an imprecise and inaccurate analysis of the green belt purposes performed by specific areas of the Green Belt promoted for development; and
- the Green Belt Assessment Part 2: Areas for Further Investigation has not built on the initial findings of the Green Belt Assessment (Part 1), 2015 or consultation feedback and the latter evidence base has been given insufficient weight.

Both these matters require further consideration and amendment in producing the final evidence base in support of the Regulation 19 Local Plan.

2.0 Specific Areas for Further Investigation

Specific comments are made on the following sites:

Green Belt Area for Further Investigation: 021

The area selected for assessment includes land outside the Green Belt.

Area A.1 includes Site OXT 020 which is currently within the Green Belt. The site is surrounded on three sides by open land and contributes to the openness of the Green Belt. The Assessment accepts that the area has checked the unrestricted sprawl of the built up area and assisted in safeguarding the countryside from encroachment. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Area A.3 includes the five Limpsfield sites along the A25 (Sites OXT 22, 24, 54, 55, 56) which are currently within the Green Belt. The sites comprise very low density residential development amongst large plots comprising woodland and meadow grassland. The Assessment accepts that the area has an overall sense of openness. The Assessment considers that the residential properties do not relate well to the purposes of the Green Belt (although they largely pre-date the designation of the Green Belt) but does not justify this statement. The area has clearly checked the unrestricted sprawl of the built up area and assisted in safeguarding this part of the defined countryside from encroachment. The Assessment accepts that the area preserves the setting of Limpsfield Conservation Area. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Green Belt Area for Further Investigation: 022

Area 022 includes no HELAA sites. The Assessment accepts that the area (apart from Old Oxted Conservation Area) contributes to the openness of the Green Belt. The Assessment accepts that the area has checked the unrestricted sprawl of the built up area and assisted in safeguarding the countryside from encroachment. The Assessment accepts that the area preserves the setting of Old Oxted and Broadham Green and Spring Lane Conservation Areas. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Green Belt Area for Further Investigation: 023

This area includes the built up area of Old Oxted and surrounds and considers whether the area fulfils the purposes of the Green Belt or should be inset and excluded from the Green Belt designation through the Local Plan.

The 'oval' depicting the Area for Further Investigation comprises a dense historic core designated as the Old Oxted Conservation Area and beyond a number of culs-de-sac

predominantly dating from the 1950s comprising lower density development with larger plots. The Area for Further Investigation excludes areas of the Defined Village boundary included in the adopted Local Plan including land to the north of the A25 and King George Playing Fields. However, the adopted Defined Village boundary and the Conservation Area form a more logical basis for assessing whether the area fulfils the purposes of the Green Belt. In this respect the low density properties set in large grounds fronting Neb Lane and King George Playing Fields are predominantly open and likely to fulfil the following purposes of the Green Belt and should be retained within it:

- checked the unrestricted sprawl of the built up area;
- assisted in safeguarding the countryside from encroachment
- preserved the setting of Old Oxted Conservation Area
- helped in the regeneration of Oxted

Old Oxted and Oxted have not merged together and the very small gap between the settlement boundaries between Oxted and Old Oxted should be retained as part of the Green Belt. This would help fulfil the final important Green Belt purpose in this location:

- prevent neighbouring towns from merging into one another

Green Belt Area for Further Investigation: 051

The area selected for assessment includes a large proportion of land outside the Green Belt.

The area includes Site OXT 035 which is currently within the Green Belt. The site comprises two large blocks of ancient woodland and makes a notable contribution to the openness of the Green Belt. The Assessment accepts that the area has checked the unrestricted sprawl of the built up area and assisted in safeguarding the countryside from encroachment. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Green Belt Area for Further Investigation: 052

The area selected for assessment includes a large proportion of land outside the Green Belt.

The area includes Site OXT 006 which is currently within the Green Belt. The Assessment describes the area as predominantly open and undeveloped (despite including part of the built up area outside the Green Belt). The promoted site is entirely undeveloped and with the wider area contributes to the openness of the Green Belt. The Assessment accepts that the area has checked the unrestricted sprawl of the built up area and assisted in safeguarding the countryside from encroachment. Importantly the area serves as a green wedge which separates the distinctive areas of Oxted and Limpsfield and prevents these residential areas from merging. The Assessment accepts this purpose for Area for Further Investigation 053

and for consistency this important open gap should be confirmed as fulfilling this Green Belt purpose. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Green Belt Area for Further Investigation: 053

The area selected for assessment includes land outside the Green Belt.

The area includes Site OXT 007 which is currently within the Green Belt. The Assessment describes the area as open, wooded and predominantly undeveloped (despite including part of the built up area outside the Green Belt). The promoted site is entirely undeveloped and with the wider area contributes to the openness of the Green Belt. The Assessment accepts that the area has checked the unrestricted sprawl of the built up area; assisted in safeguarding the countryside from encroachment and prevents distinctive residential areas from merging. In addition, it should be noted that the area also helps in the regeneration of Oxted by encouraging the recycling of derelict and other urban land as demonstrated by the Gas Holder site and the many other windfall sites which have, and will continue to, come forward in the urban area.

Landscape Capacity and Sensitivity Study, 2016

1.0 Methodology

The Landscape Capacity and Sensitivity Study considers the landscape sensitivity, value and capacity of a number of individual sites in order to assist in determining the most appropriate strategy for meeting needs in the District.

The 2016 study states that the Surrey Landscape Character Assessment - Tandridge District, 2015 was used as a starting point. Indeed, the Surrey Landscape Character Assessment states that it forms part of the evidence base from which development and management strategies can be derived, with particular reference to the conservation, enhancement or restoration of the landscape. This fulfils one of the core principles in national planning policy to recognise the intrinsic character and beauty of the countryside, and the requirement for Local Plans to include policies for the conservation and enhancement of the natural environment, including landscape.

However, it is clear that the 2016 Study brief was to examine the landscape sensitivity, value and capacity of a number of individual sites. In this process, it appears that the over-arching recommendations of the 2015 study have been supplanted.

The Surrey Landscape Character Assessment - Tandridge District, 2015 identifies three different character areas to the north, centre and south of Oxted.

Four housing sites are promoted within the northern character area (Greensand Valley): OXT 006; OXT 007; OXT 034 and OXT 035. The landscape strategy for the Greensand Valley is to conserve the rural character of the open pastoral valley sides, the historic village cores, the varied water bodies, the historic parks and gardens and the views to the wooded backdrop of the greensand hills and chalk downs. Elements in need of enhancement include the hedgerows and management of the woodlands.

Part of the land management guidelines states:

Conserve and, where appropriate, encourage repair of the historic designed landscape to maintain and restore key elements such as avenues, woodland blocks, designed views and boundary features.

Part of the Built Development guidelines states:

Improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.

The remaining sites other than the group of five sites along A25 (OXT 22, 24, 54, 55, 56) are located within the Low Weald Farmland Character Area. The landscape strategy for the Low Weald Farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees.

Part of the Built Development guidelines states:

- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*

Overall, the Oxted and Limpsfield Residents Group consider that the Landscape Capacity and Sensitivity Study, 2016 has not reflected the guidance from the Surrey Landscape Character Assessment - Tandridge District, 2015 in site assessments and the latter evidence base has been given insufficient weight.

2.0 Specific Sites

OXT 006

Landscape Sensitivity

Contribution to separation between settlements

The appraisal does not recognise the vital role that this green wedge plays in preventing the merging of Oxted with Limpsfield. This site makes a significant contribution to separating settlements and this should be recognised in the score attributed to this aspect of Landscape Sensitivity.

Inconsistency with existing settlement form/pattern

A consequence of the above would be that development would represent inconsistency with existing settlement form/pattern as sought for this character area by the Surrey Landscape Character Assessment - Tandridge District, 2015. Consequently, the score given to this aspect of Landscape Sensitivity should be reviewed.

The Oxted and Limpsfield Residents Group consider that the Landscape Sensitivity of OXT 006 should be Substantial.

OXT 007

Landscape Sensitivity

Ecological sensitivity

The appraisal does not recognise that the site abuts ancient woodland. OXT 006 and OXT 025 also adjoin ancient woodland and score 2 for Ecological Sensitivity and for consistency OXT 007 Ecological Sensitivity should be amended.

Contribution to separation between settlements

The Green Belt Assessment Part 2: Areas for Further Investigation, 2016 recognises this site prevents the merging of two residential areas Old Oxted and Oxted north of the railway line. This site makes a significant contribution to separating settlements and this should be recognised in the score attributed to this aspect of Landscape Sensitivity.

Inconsistency with existing settlement form/pattern

A consequence of the above would be that development would represent inconsistency with existing settlement form/pattern as sought for this character area by the Surrey Landscape Character Assessment - Tandridge District, 2015. Consequently, the score given to this aspect of Landscape Sensitivity should be reviewed.

The Oxted and Limpsfield Residents Group consider that the Landscape Sensitivity of OXT 007 should be Substantial.

Site Based Ecology Assessments, 2016

The walkover survey is a summary preliminary ecological assessment and was not an extended Phase 1 Habitat Survey and is therefore subject to certain limitations. Notably the boundaries and the valuation of each habitat area may be subject to change following an extended Phase 1 habitat survey. Recommendations are also made for further survey and assessment should the site be taken forward for more detailed development planning and this will be required ahead of the preparation of the Regulation 19 Local Plan.

The assessment includes comments on constraints and potential development yield for each site. It is noted that these have not been incorporated into the HELAA or the Regulation 18 Local Plan Sites Consultation. The consequence of not using this up to date evidence base is that the Local Plan Sites Consultation over-estimates the potential net development area and potential yield for sites should they be proposed in the Local Plan.