

Collective Representation on the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation

1. This representation to the Tandridge District Local Plan – Issues and Approaches Regulation 18 Consultation is submitted to Tandridge District Council and is supported by:

Oxted & Limpsfield Residents Group

A residents' association with more than 2,400 members, from Oxted and Limpsfield and across Tandridge.

Campaign to Protect Rural England -- Tandridge Branch

Chaldon Village Council

Chelsham and Farleigh Parish Council

Crowhurst Parish Council

Dormansland Parish Council

Godstone Parish Council

Horne Parish Council

Limpsfield Parish Council

Lingfield Parish Council

Outwood Parish Council

Tatsfield Parish Council

Woldingham Parish Council

Chaldon Residents Alliance

Informing and encouraging residents of Chaldon to take ownership for the development and future of their village – around 560 members

Godstone Preservation Society

Godstone Preservation Society was established in 1957.

Nutfield Conservation Society

A village group and registered charity which seeks to preserve the rural character of Nutfield parish.

South Godstone Residents Association

Set up to promote and protect the interests of members in the village and to preserve the rural nature of the neighbourhood and its amenities.

Godstone Village Association

The organisation looking after the interests of the village and its villagers

Portley Residents Alliance

Representing residents in Caterham on the Hill, around 350 members

Woldingham Association:

Formed more than 100 years ago to protect and preserve the distinctive character of Woldingham.

2. Local groups have worked together previously on aspects of the emerging Local Plan, e.g. the objectively assessed need for housing. In 2014, OLRG, Caterham on the Hill Parish Council and Woldingham Parish Council (with the support of other groups) combined as joint Rule 6(6) parties to successfully challenge the appellant's evidence on objectively assessed needs in Tandridge at the Whyteleafe Road, Caterham, Public Inquiry. The Rule 6(6) parties were represented by Paul Brown, QC.

Contributors to this representation: Paul Brown QC; Tony Fullwood MRTPI (Tony Fullwood Associates); Robin Miller (Understanding Data).

2.0 Summary

3. There is a fundamental disconnect between the Issues and Approaches document and the NPPF, the evidence base, the distinctive characteristics of Tandridge and the priorities of local residents. This is relevant because paragraph 1 of the NPPF states that [ed: emphasis added]
It [the NPPF] provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
4. At times the Issues and Approaches document and parts of the evidence base seem to have been written about an entirely different place than Tandridge. This disconnect is even clearer when the document is compared to its predecessor, the Core Strategy 2008. In the Core Strategy 2008, half of the Issues include references to the Green Belt, open spaces, high quality landscapes, biodiversity, AONB, all of which are distinctive characteristics of Tandridge. Conversely, only a minority of the 73 assertions in the Issues and Approaches document refer to any of these. The introduction of the NPPF has not changed either the issues facing the district or the priorities of local residents, yet this recent past appears to have been completely ignored in the emerging Local Plan documents.
5. The Issues conflict with the evidence base and do not reflect the distinctive characteristics of Tandridge. We have included extensive comments on the Issues section because we understand that it is the Issues that provide the context for the objectives, vision and eventually the policies of the new Local Plan and so if the Issues do not accurately reflect Tandridge, then the new Local Plan will not be appropriate for Tandridge.
6. In the Delivery Strategies, the distinctive characteristics of Tandridge -- open countryside, high quality landscapes, small, rural settlements and long-standing local businesses, are marginalised to make way for a Tandridge that is a dormitory district where residents travel to jobs located elsewhere, mostly by car. While the apparent conflict between the Delivery Strategies and the sustainable development objectives of the NPPF appears to be recognised in the evidence base, this has not been reflected in the Issues and Approaches document. The Delivery Strategies are not sound because they are based on documents which are not robust, conflict with the evidence base and are not consistent with national policy.
7. 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 we have highlighted three – the Objectively Assessed Needs Study, the Housing and Economic Land Availability Assessment and the Green Belt Assessment -- that we do not consider to be fit for purpose for developing a sound Local Plan.
8. The consequence of all of the above is that the emerging Local Plan documents do not reflect the distinctive characteristics of Tandridge, are not justified, and are inconsistent with national policy and so are not an appropriate basis from which to prepare a sound Local Plan.

9. This document contains our comments on the Issues and Approaches document, which is then followed by:
 - Appendix 1: Detailed comments on the Issues chapter 7 of the Issues and Approaches document
 - Appendix 2: Critique of the Objectively Assessed Needs Paper
 - Appendix 3: Critique of Strategic Green Belt and selected Green Belt Parcel Assessments

3.0 Comments on Chapter 7: What are the issues facing the district?

10. In order for the objectives and vision, and eventually, the Local Plan, to be relevant and appropriate for Tandridge, the Issues should:
 - reflect the distinctive characteristics of Tandridge (without this, the Local Plan cannot be appropriate for Tandridge)
 - be evidence-based (as required by the NPPF)
 - reflect the needs and priorities of local residents (NPPF paragraph 1)
 - identify any Tandridge-specific attributes that may impact the sustainability objectives of the NPPF
11. However, the list of Issues in Chapter 7 is not a list of “important problems for debate or discussion” (which is the definition of the word “issue”) because it contains 73 assertions that:
 - either conflict with or are not supported by the evidence base and do not reflect the characteristics of Tandridge
 - are facts, descriptions or wider trends which appear to have been selected at random with no explanation as to why they have been selected as opposed to any other facts, descriptions or wider trends. There is also no explanation of why these general trends are particularly important for Tandridge and whether they can be addressed in the Local Plan.
 - do not reflect the priorities of local residents
12. This list of 73 issues is a surprisingly long one for such a small district especially in light of the fact that the Core Strategy 2008 specifies just 14, all of which reflect the distinctive characteristics of Tandridge.
13. We have devoted considerable attention to these Issues because we believe that they are fundamentally flawed and so are not a robust starting point for producing the Local Plan. In the following section we focus on three of the categories - economy, housing and natural environment - to illustrate how a different picture both of Tandridge and the issues facing the district emerges when the evidence base is cross-referenced, the extraneous information removed and the focus placed on the sustainability objectives of the NPPF. We include more detailed comments on the Issues in Appendix 1.

Economy

14. The list of Issues in this category portrays Tandridge as having businesses that are at risk due to being isolated and having poor quality premises and that younger age groups are leaving due to limited employment and housing.
15. Instead, the evidence base (explained in more detail in Appendix 1) shows that the Tandridge economic base is relatively stable with a host of long-term local businesses that survived the 2008 financial crisis and subsequent recession and that see mostly advantages to operating in Tandridge.
16. What the evidence base also shows is existing and increasing competition from neighbouring areas with regards both to employment¹ and town centres² that will

¹ Explained in more detail in the Appendix 2: Critique of the OAN.

constrain Tandridge local economic growth. These neighbouring districts have recognised, larger and more sustainable urban centres with a well-established critical mass of customers, suppliers and services from which to grow existing businesses and attract new local employers. These centres also have sufficient size and scale to justify investment in the new infrastructure required to support sustainable economic growth³.

17. The evidence base shows that the existing settlements in Tandridge do not have the necessary attributes to compete economically with these nearby districts. This is even before considering the effect of London as a competing centre as noted on page 64 of the Settlement Hierarchy which states:
Further, Tandridge District has excellent links to London where highly skilled residents can find a variety of well-paid positions and it is not plausible to think that the local area or surrounding districts and boroughs can compete with this.
18. However, it is important to remember that this lack of local scale does not mean that the Tandridge economic base is in decline, but instead the economic studies show long-term stability albeit with limited local growth prospects.
19. As the above shows, the Issues and Approaches document does not accurately reflect the economic evidence, and so there is a real risk that the policies in the new Local Plan will not be appropriate for the local Tandridge economy.
20. The evidence base also shows that 39.1% of people who work in Tandridge live in the district⁴. This attribute was also identified in the Core Strategy 2008. However, there is no evidence to support the assertion in the Issues that the reason for low self-containment is that low-skilled commute in and the high skilled commute out of the district.
21. What the evidence base does show is that one possible factor contributing to the low self-containment measure might be that there has been an unusually high rate of house building in the past⁵ combined with a significant loss of local employment.
22. These high rates of housebuilding stimulated inward migration into Tandridge because, as the SNPP 2012 population projections and the OAN Paper show, Tandridge has a very low rate of local population growth (natural change) and house building is linked to inward migration.⁶
23. The unusually high rates of housebuilding in Tandridge have been made possible due to the loss of large local employers as explained in the Tandridge Economic Development and Business Study [ed: emphasis added]:

² Tandridge Retail and Leisure Study, paragraph 3.74 “However, major developments in neighbouring authorities will limit the ability of shopping facilities in the District to increase their market share of expenditure.”

³ See Appendix 2: Critique of the OAN for a list of some of the more comprehensive regeneration and expansion projects nearby that encompass employment, infrastructure, sustainable transport and retail.

⁴ Tandridge Economic Needs Assessment, paragraph 3.3.4, Strategic Housing Market Assessment: Defining the Housing Market Area, paragraph 4.11.

⁵ Strategic Housing Market Assessment: Analysis of Market Signals, Figure 3.13.

⁶ ONS SNPP 2012 Population Projections for Tandridge and the Strategic Housing Market Assessment: Objectively Assessed Needs paper, Chart 3 on page 14 and Annex A, paragraph 3.

*2.6.1 As part of the background research a previous economic development strategy position statement produced in the mid-1990's was located. Within the appendices a table of major employers was published listing over 30 major employers based within the District. **Regrettably the majority of these are no longer based within the District and in many cases the sites they occupied have been redeveloped for residential use.***

24. The loss of employers was not specific to Tandridge and instead was part of a wider corporate and public sector re-structuring trend. These former employment sites were redeveloped into housing, and that stimulated additional inward migration (See Appendix 2 for more details).
25. However, the increase in population from inward migration was not accompanied by local jobs growth and instead local employment declined, and so the result is a fall in the self-containment measure.
26. There is no evidence to support the assertion that younger age groups are leaving Tandridge due to limited employment and jobs. Economic activity rates for younger age groups are similar to those in Surrey and England. The evidence base shows that Tandridge has a relatively low unemployment (JSA claimant) rate overall, and an improving rate within the 16-24 age range⁷. A previous study conducted by GL Hearn shows net *inward* migration in all age bands except 15-19, the latter possibly due to limited secondary/further education provision in Tandridge which is also shown in the evidence base.
27. There has also been a significant increase in private rented accommodation and flatted developments, all of which have increased housing choice for younger age groups. As explained later, Tandridge also has a much higher proportion of home ownership with a loan in younger age groups than in Surrey or England.
28. In conclusion, the Issues proposed in the Economy category are not supported by the evidence base which shows a stable local economic base albeit with limited growth prospects. This evidence has implications for whether any of the proposed Delivery Strategies can fulfill the NPPF objective of locating "jobs near homes". Each of the economic studies includes a list of recommendations for supporting the retention of these long-standing local businesses yet they have not been incorporated into the Delivery Strategies. These are further examples of the disconnect between the Issues and Approaches, the evidence base and the NPPF which may result in a new Local Plan that is neither appropriate for Tandridge nor compliant with the NPPF.

Housing

29. The proposed list of Issues portrays a housing market dominated by wealthy older people and large houses and offering limited choice. However, the evidence base shows a more dynamic market.
30. The evidence base shows that Tandridge has a much higher proportion of household reference persons (HRP) in the 20-35 age group (44.7%) that own homes with mortgages than either in Surrey (38.5%) or England (30.5%).⁸ This is

⁷ Functional Economic Area Topic Paper, page 9.

⁸ The evidence base also contradicts the assertion made in bullet 2 of the Strategic Context which implies that the decline in home ownership in the 25-34 age group is a Tandridge-specific issue. The ONS data

explained in paragraphs 2.15 and 2.16 of the Strategic Housing Market Assessment: Addressing the Needs of All Households Technical paper:

Ownership with a mortgage or loan is generally more frequent, and around 45% of younger households with a HRP aged 34 and under own their property through this tenure...

Notably, this is higher than the national figure of 30.5%, suggesting that younger households in Tandridge are more likely to own their property with a mortgage than the national average, despite the district's considerable affordability challenges. Tandridge also surpasses the figure for Surrey.

31. The evidence base also shows that the private rented sector has increased by 78.8% between 2001 and 2011 and so around 10% of all households in Tandridge now rent privately. There has been a 20% growth in flatted and other similar types of development in Tandridge. All of this indicates a more dynamic market with more choices than implied by the proposed Issues, particularly for younger age groups.
32. The evidence base also shows that Tandridge has about average ownership and tenure in older age groups and so the assertion that this age group is particularly "dominant" in Tandridge is not supported. There is no income/age distribution in the evidence base and so the assertion that older residents in Tandridge are particularly "wealthy" is also not supported. The trend for older people to own their own homes is not specific to Tandridge, and in that context, the ONS data shows that Tandridge is about average.
33. The evidence base also shows that the number of bedrooms per household is very similar to that of Surrey. The comparison with the England average in Issue 3 is not relevant because the England average includes a number of large high density urban and suburban cities and towns and so it is not surprising that predominantly rural Tandridge would be higher.
34. What the evidence base does show is that those working outside the district earn an average of 22.5% more per week than those working in the district. This is a greater disparity than in the South East or Great Britain.⁹ This unusually large disparity may partly be due to the Tandridge average wage calculation falling as a result of the disproportionate effect that the loss of a large number of local higher-skilled employment (explained above) would have had on a small employment base. No matter what the underlying cause, the implication remains that housing in Tandridge is more affordable for those who work outside the District and adding to the local housing stock will not remedy this.
35. In conclusion, most of the Issues proposed in this category are not supported by the evidence base. Increasing the housing stock will not address the wage disparity and could in fact exacerbate it. The implication of limited local employment growth prospects is that increases in the housing stock will not be

shows that in England and Wales, for those aged 25-34, the percentage of owner occupiers declined from 58 percent in 2001 to 40 percent in 2011. The fact that home ownership in the younger age groups in Tandridge is significantly higher has been omitted in bullet 2 of the Strategic Context. In addition, the proportion of those aged 65+ that own their own homes in Tandridge is not dissimilar to the national average, and this context has also been omitted in bullet 2.

⁹ Tandridge Economic Needs Assessment, Table 3-6, paragraph 3.7.2.

accompanied by increases in local jobs and this would fail to fulfill the NPPF objective of “jobs near homes” to ensure sustainability. This attribute has not been carried forward into the Delivery Strategies and so is another example of the disconnect between the Issues and Approaches document and the NPPF.

Car travel

36. The evidence base shows that the car is the dominant mode of travel for employment and access to services, even where alternatives, such as the train, exist. This is another significant factor to take into account when considering whether the Delivery Strategies fulfill the sustainable development objectives of the NPPF.
37. As explained above, 39.1% of those who work in the district live in Tandridge. The 2011 Census travel to work data shows that of those travelling out of the district to work, 65% travel to work by car and only 28% travel by train¹⁰ and 3% by bus¹¹. The economic studies show that 78% of employees working in Tandridge (which includes those who live and work in the district and those who commute into the district) travel to work in Tandridge by car.¹² This pattern is consistent with most employment sites having “poor or very poor access” to public transport.¹³
38. In addition to having to travel for employment, in many of the settlements there is also no choice but to travel elsewhere to find one or more of: a supermarket of any substantial size, a chemist, a GP, public house, church/chapel, primary or secondary school, comparison goods shops or hospitals. Some settlements have no scheduled bus service, while in others only a limited service exists, so there is no alternative but to travel by car.
39. Even in those areas where there may be more frequent bus services or where train stations exist, the evidence base shows conclusively that these alternatives do not afford the same degree of reliability and flexibility in accessing employment, shops and services compared to use of the private car. This is supported by the economic studies and also by the Tandridge Retail and Leisure Study, Paragraph 3.82 which explains [ed: emphasis added]
*And the household survey identified that **86%** of respondents travel to do their main food shopping by car....”*
40. Existing patterns of travel are a fairly clear indicator of how people are likely to travel to work and access services if more housing is added in the same area. Given the current dominance of car travel to access both employment and day to day services shown in the evidence base, it is reasonable to conclude that more houses will inevitably mean more car travel.

¹⁰ Appendix 1: Infrastructure Issues highlights that there are physical capacity and funding constraints to increasing rail services in the district. This is in sharp contrast to other parts of London and the SouthEast which are experiencing significant rail capacity increases and service improvements e.g. CrossRail and Javelin. Rail services in Tandridge may also be put at risk as a result of the recently announced (January 2016) take-over of suburban railway lines by Transport for London which the press release indicates will take effect in 2021 in Tandridge.

¹¹ 2011 Census via nomis, WU03UK: Location of usual residence and place of work by method of travel to work, All usual residents aged 16 and over in employment

¹² Tandridge Economic Development and Business Study June 2014, Paragraph 9.6.1, Fig 5a.

¹³ Economic Needs Assessment, paragraph 4.3.3.

41. The significance of these two factors -- car travel and reliance on employment elsewhere – to sustainability is noted on Page 63 of the Settlement Hierarchy which confirms that both are contrary to the NPPF:

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

42. However, there would appear to be no recognition of the fact that the Delivery Strategies do not fulfill either the objective of locating jobs near homes or minimising unsustainable modes of travel. This represents another fundamental disconnect between the objectives of the NPPF and the approach taken in these emerging Local Plan documents.

Natural Environment

43. The low priority that seems to be placed on the natural environment conflicts with the high priority placed on the natural environment in Chapter 11 of the NPPF, in past Local Plans such as the Core Strategy 2008, and by local residents.
44. The proposed list of Issues in the natural environment sub-section is a collection of facts, where the only potential “issue” is unsympathetic leisure uses, of which there is no mention in the evidence base.
45. Further evidence for the low priority given to the natural environment in the emerging Local Plan is shown by the dismissal of the comments from Natural England regarding inclusion of SSSIs as Tier 2 constraints as shown on page 59 of the Spatial Approaches Topic Paper. Natural England states [ed: emphasis added]:

*“We are however concerned that SSSIs in your Local Authority are only deemed to be “orange” or second tier constraints. We **strongly believe that the SSSIs within your area should be identified as “red” constraints in this Constraints paper.** The National Planning Policy Framework emphasises the importance of SSSIs at paragraph 118 as follows: “proposed development on land within or outside a SSSI likely to have an adverse effect on a SSSI (either individually or in combination with other developments) should not normally be permitted.....*

46. Despite this, SSSIs are still Tier 2 constraints because the Spatial Approaches Topic Paper concludes that SSSI losses from development can be “mitigated.” This does not reflect the importance accorded to these unique sites in the NPPF.
47. Similarly, we disagree with the Green Belt being treated as no more than a policy constraint because:
- Considering the Green Belt as only a “policy” constraint is inconsistent with the importance which the NPPF attaches to the permanence of the Green Belt. Permanence is one of only two essential characteristics of the Green Belt defined in NPPF paragraph 79. In recognition of their permanence, Green Belt boundaries can only be changed in exceptional circumstances as part of developing the Local Plan.
 - The Green Belt has been a major factor in defining, shaping and retaining the distinctive character of Tandridge which is so valued by residents. The influence

of the Green Belt in Tandridge has been far more significant than what is implied by considering the Green Belt a “policy” constraint in the Spatial Approaches.

48. We disagree with the low priority that seems to be attached to the natural environment and the Green Belt because the distinctive characteristics of Tandridge are its natural environment, open countryside, Green Belt, high quality landscapes, AONBs, high number of areas rich in biodiversity, wildlife habitats and heritage.

3.1 Issues that we believe the Local Plan should be addressing

49. This section is in response to the question what issues the Local Plan should be addressing. Little has changed in Tandridge since the Core Strategy was prepared in 2008, yet many of the issues that are distinctive to Tandridge and that are considered most important to residents have not been included in the Issues and Approaches document. We refer to the Core Strategy 2008 because even though Regional Plans have been revoked, the evidence for them has not been expunged from history. The following list of issues are all supported by and compatible with the NPPF.

Issue 1: Retention of the Green Belt to ensure communities remain separated and to prioritise re-use of brown field over green field sites

50. Consistent with the NPPF, residents see the Green Belt as being vitally important to protecting the existing open and undeveloped character of the District, particularly as the District is so close to London. Without the Green Belt, the outward spread of London would be uncontrolled and would result in an expanding urban area that would swamp the existing communities. Also without the Green Belt, existing communities would eventually merge, both within the District as well as with communities outside of Tandridge. It is also important to protect the Green Belt as it provides opportunities for access to the countryside and outdoor recreation for the population of London and other nearby areas.
51. While this issue might apply in any authority that contains Green Belt land, the fact that Tandridge is 94% Green Belt means that the Green Belt is an absolutely fundamental and defining feature of Tandridge. Therefore, the Green Belt should be embraced as a distinctive characteristic of Tandridge and not sidelined or ignored as it seems to be in the emerging Local Plan documents.

Issue 2: Protection of the countryside and in particular landscapes of national importance (AONBs)

52. The Surrey Hills and the High Weald Areas of Outstanding Natural Beauty are landscapes of national importance and the NPPF recognises that great weight should be given to conserving landscape and scenic beauty in these areas because they have the highest status of protection in relation to landscape and scenic beauty. The pressure for development in the District makes this protection even more important. Local Landscape designations should also be used to protect all of the areas that meet the criteria. Some of these areas provide important “buffers” to the setting of the AONB. The views into and out of the AONB must also be protected if the integrity of the AONB is to be preserved which would be consistent with the NPPF.

Issue 3: Adequate infrastructure and services to accompany new development

53. The NPPF recognises the importance of infrastructure and so adequate services and infrastructure should be provided to meet the needs of new development and the existing community. Adequate infrastructure should accompany all forms of development, not just housing. It is important to recognise that the cumulative impact of incremental development on an area's infrastructure can be significant. There is an existing infrastructure deficit that needs to be remedied which arose due to the unexpectedly high rates of house-building (explained earlier) which was not accompanied by new infrastructure. The Council and service providers must monitor what new infrastructure and services may be needed, and whether the lack of infrastructure is a constraint that indicates development may need to be restricted.

Issue 4: Protection and provision of open space, sports, play, recreational and community and cultural facilities that are sufficient to meet the community's needs and that are accessible to all

54. The health benefits to local residents from the availability of a wide range of open space, sports, play and recreational facilities are confirmed in the evidence base. These facilities are another distinctive characteristic of Tandridge which makes it an attractive place to live and also to visit. It is therefore vitally important that existing open space, sports and recreational facilities are protected. Consistent with the NPPF, access to the countryside should also be protected and opportunities to plan positively to enhance the beneficial use of the Green Belt, such as providing opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land in accordance with the paragraph 81 of the NPPF, should also be considered.

Issue 5: Protection, management and enhancement of biodiversity

55. The District has a wealth of wildlife sites and natural features, including Sites of Special Scientific Interest (SSSI) which are sites of national importance. The importance of biodiversity is recognised in the NPPF and so the protection and proper management of these sites is of vital importance. In addition, where possible, enhancement and improvement of such sites should be sought. Whilst the most important sites are designated as SSSIs, there are many other sites that whilst being noted as having importance do not enjoy the same level of protection. These sites, and important habitats and protected species, also need to be protected.

3.2 Conclusion

56. The proposed list of Issues does not reflect the issues which are high priority to local residents and the NPPF, including protection of the natural environment, the Green Belt, high quality landscapes and open countryside, biodiversity and habitats. Lastly, the list of Issues does not address the existing infrastructure deficit or the need to avoid future deficits occurring by ensuring that infrastructure is delivered ahead of development.
57. As the above examples show, the Delivery Strategies have not taken into account the two attributes of Tandridge that other evidence documents recognise as

conflicting with the sustainability objectives of the NPPF: jobs not being located near homes and the dominance of car travel. This means that any existing imbalances and unsustainable travel patterns will only be exacerbated as the housing stock is increased. This represents a fundamental disconnect between the Issues and Approaches document and the NPPF.

58. As the proposed list of Issues is not correct, what follows cannot be correct and so we have not commented on the vision and objectives and instead move onto the Delivery Strategies.

4.0 Comments on Chapter 11: The People (Delivery Strategies)

59. Delivery Strategy Approaches 2a-6 are not considered sound as they are not:
- justified (the most appropriate strategy, when considered against the reasonable alternatives, based on the evidence)
 - effective (the plan should be deliverable over its period)
 - consistent with national policy
60. In relation to the Approaches proposed, the emerging Local Plan is supported by an evidence base which is not considered robust. The consequence is that the Local Plan approaches are not soundly based. We focus on three of the most important Evidence Base Studies – the OAN paper, the HELAA and the Green Belt Assessments - because in their current form they are not considered to be fit for the purpose of developing a sound Local Plan.¹⁴

4.1 Evidence Based Studies

Objectively Assessed Needs

61. Paragraph 11.0.1 states that the objectively assessed housing need is 9,400 dwellings across the 20 year plan period (2013-2033). Appendix 2 of our consultation response includes a detailed critique of the Strategic Housing Market Assessment: Objectively Assessed Needs paper (OAN Paper) which explains why both the methodology used and the results do not fulfill the requirements of the NPPF and the NPPG because:
- The OAN Paper confirms that inward migration is linked to house building, but fails to apply this with the result that the projections are inflated because they project forward an average of past high rates of inward migration which were only made possible through one-off circumstances where almost all large employers left the district and the redundant employment sites were re-developed for housing.
 - The ten-year average used in the OAN Paper assumes that the circumstances of the past ten years will persist for the next twenty years, but the evidence shows that the supply of these large redundant employment sites has been exhausted.
 - The evidence base shows that there is no genuine economic reason for high levels of inward migration.

¹⁴ The focus on three documents should not be interpreted as the remaining documents being correct because we also found problems in, for example: Settlement Hierarchy, Spatial Approaches Topic Paper, Sustainability Appraisals (both), Infrastructure Papers (all four), Equalities Impact Assessment.

- The inclusion of all migration flows is flawed because historic flows are widely dispersed among many local authorities. This means that the needs figure shown in the OAN paper includes need from local authorities that do not include Tandridge in their Housing Market Area (HMA) evidence because **no** local authorities include Tandridge in their HMA evidence.
 - The evidence base shows that Tandridge appears to have inadvertently accommodated unmet need from other areas and this has been captured and projected forward in the OAN paper. According to the Planning Advisory Service (PAS) OAN Technical note (see Appendix 2), unmet need arising in other areas should not be included in the OAN.
62. This OAN Paper also shares some of the same flaws present in both the appellant's report and in the GL Hearn Report which were identified by Tandridge District Council during the Whyteleafe Road, Caterham, Public Inquiry (see Appendix 2) where the question of housing needs in Tandridge was debated. At that Public Inquiry, the Council's barrister put forward its case setting out the flaws and this OAN paper contains a number of the same flaws.

Housing and Economic Land Availability Assessment (HELAA), 2015

63. The HELAA sets out to assess the suitability, availability and achievability of land for development.
64. Whilst being aware that the HELAA does not allocate sites for development, it is clear that the Delivery Strategy Approaches set out rely on the delivery of certain sites. For this reason, it is imperative that the HELAA represents an appropriate proportionate evidence base on which to build a sustainable planning strategy.
65. 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...

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.*
66. In assessing suitability, the HELAA appears to consider only the on site physical limitations such as the opportunity for access, site topography, site landscape

features and Green Belt designation (although the latter is ignored in assessing suitability).¹⁵

67. In accordance with Government Guidance this is wholly inadequate – and therefore the HELAA forms an unsound basis for assessing reasonable alternative development options.
68. In particular, in relation to national planning policy, the assessment does not take into account:
- the presence or setting of heritage assets (listed buildings; conservation areas, archaeological remains etc) or the impact of development on such assets (NPPF Para 129)¹⁶
 - the impacts on biodiversity including designated habitats, areas likely to provide habitats for protected species; areas acting as stepping stones for the migration of species (NPPF Paras 114; 117 – 119)
 - the wider impacts on the landscape and green infrastructure context of the site (rather than just site features) using the Landscape Character Assessment (NPPF Para 109)¹⁷
 - the impacts on public open space (NPPF Para 73 – 74)
 - the availability of sustainable transport links (NPPF Para 35)¹⁸
 - the proximity of sites to services and facilities (NPPF Para 34)¹⁹
 - the suitability of vehicular access for the scale of development envisaged (rather than the presence of existing access points) (NPPF Para 32)²⁰
 - the impact on the environment and amenity experienced by would be occupiers and neighbouring areas(NPPF Para 17)²¹
 - the impact on the designated Green Belt (whilst this is assessed in a separate document, the presumption against inappropriate development should be noted as a major constraint at this stage)

¹⁵ The need to show exceptional circumstances is itself a constraint and so should be included in the assessment.

¹⁶ Para 129: *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.*

¹⁷ The planning system should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, geological conservation interests and soils...

¹⁸ Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ... give priority to pedestrian and cycle movements, and have access to high quality public transport facilities...

¹⁹ Plans ...should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

²⁰ Plans ... should take account of whether...safe and suitable access to the site can be achieved for all people...

²¹ ...seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings

Conclusion

69. Unless and until the above assessments of suitability are completed, the HELAA should NOT form the basis for assessing reasonable alternative development options or the long term planning strategy for the area.

Green Belt Assessment, 2015

70. Even if the Green Belt assessments were to be justified, there are a number of flaws in the methodology and its implementation:

Appropriateness of the parcels

71. The NPPF reference to railways, major roads etc is in the context of defining new Green Belt boundaries. Whilst for analytical convenience it may be easier to assess smaller parcels of land, these parcels are artificial constructs which now divide sections of Green Belt performing a single purpose, such as providing the setting to a Conservation Area or checking the unrestricted sprawl of large built up area. Their subdivision does not facilitate an assessment of the role of the wider Green Belt around a settlement and consequently tends to diminish the purposes which the Green Belt fulfils in a location.

Consideration of openness

72. There is no provision for the assessment to consider consistently the extent to which any given area contributes to the openness of the Green Belt (where "openness" means the absence of built development). The five purposes of the Green Belt are important, but the essential characteristics of Green Belt are openness and permanence. If the purpose of the Assessment is to understand how well the land around Tandridge is matching up to Green Belt policy, it is extraordinary that the parcel assessments do not specifically and consistently consider whether that land actually exhibits the essential characteristic of Green Belt land.²²

The second Green Belt purpose

73. In assessing whether a parcel prevents neighbouring towns from merging into one another, the Assessment asks
Does this parcel, either in part or in its entirety, act as a buffer to the merging/coalescence of 2 or more settlements?
74. In responding to this question, the Assessment appraises landscape features which separate settlements. Nevertheless, the presence of existing landscape features is no guarantee of their permanence or that settlements will not merge.

²² Note of Advice from Paul Brown, QC, on the Green Belt Assessment Methodology submitted to Tandridge District Council by Oxted & Limpsfield Residents Group in June of 2015.

75. In addition, the Assessment asks
Can you see any neighbouring settlement 'on the ground'? If not, what prevents this?
76. The absence of a visual inter-relationship does not appear to be an appropriate test for this purpose, as whether new development would be screened from an adjoining settlement is not a test of whether built up areas would become closer to merging. Rather it is whether the erosion of open land between settlements would cause the merging of settlements.

The third Green Belt purpose

77. In assessing whether a parcel of Green Belt assists in safeguarding the countryside from encroachment the Assessment asks
What type of development exists within the area?
78. However, in assessing the development within a parcel the description of development does not distinguish between appropriate development within the Green Belt (such as mineral workings; facilities for outdoor sport, farmsteads and isolated dwellings) and inappropriate development. Nor is this question cross referenced to whether the development was present at the time the Green Belt was designated. This leads to an exaggeration of the amount of development within a parcel – all of which may be entirely compatible with Green Belt policy.

The fourth Green Belt purpose

79. The Assessment reviews how each parcel preserves the setting and special character of historic towns.
80. There are cases where the setting of a single conservation area is included in different Green Belt parcels. This tends to dilute the function played by the setting in any one parcel – leading to only a moderate performance of this role. If the artificial construct was drawn more appropriately to reflect this purpose, however, or the assessment was more holistic, there would be no underplaying of this purpose.
81. Unfortunately, the assessment misinterprets the Historic England definition of setting and focuses on only views out from the Conservation Area. Historic England state that although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration; by spatial associations; and by an understanding of the historic relationship between places. The contribution that setting makes to the significance of a heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

The fifth Green Belt purpose

82. The assessment of each parcel of Green Belt land has not reviewed the role of the area in achieving the fifth Green Belt purpose (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). There is nothing in the NPPF to suggest that any one of the 5 purposes is more or less important than the other, and the failure to assess against one of the five purposes requires

explanation. If the Council is working on the basis that all Green Belt land in the district has the potential to serve the 5th purpose, then this should be clearly stated. If the Council does not consider that all Green Belt land in the district has the potential to serve this purpose, then there is no justification for not assessing it as part of the review.²³

83. However, the documents are inconsistent with regards to whether the fifth purpose has been assessed. While the Methodology states that the fifth purpose was not assessed, the Green Belt Assessment Report refers throughout to the 5 purposes and that the Council has carried out its assessments using all 5 purposes. For example, para 6.1 states [ed: emphasis added]:

*For each GBA parcel, the methodology required an assessment of how well each parcel served the **purposes of the Green Belt set out in the NPPF**.*

84. Similarly, the Issues and Approaches, page 60, Approach 8, Para 12.4.23 states [ed: emphasis added]:

*Paragraph 83 of the NPPF sets out that established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation of a Local Plan. In response to this, the Council has undertaken a Green Belt Assessment, investigating how parts of the district's Green Belt serve the **five stated Green Belt purposes**, which are:...*

Conclusions

85. Unless and until the above are included as part of a Green Belt Assessment, the evidence base should NOT form the basis for assessing reasonable alternative development options or the long term planning strategy for the area.

Detailed analysis of the parcel assessments

86. Appendix 3 includes a detailed analysis of a selection of Green Belt Parcel Assessments and the methodology used to carry them out. This analysis identifies a number of flaws common to them including:
- using the unjustified approach of sub-dividing the Green Belt into 'Strategic Green Belt Areas'
 - the division of the Green Belt into artificial parcels which hinders a proper assessment of the role of the land in a wider context
 - the misinterpretation of the definition of "setting" as defined by Historic England
 - the inclusion of landscape features, such as topography or trees, in the tests
 - not distinguishing between pre-existing, appropriate and inappropriate development in the Green Belt

²³ Note of Advice from Paul Brown, QC, submitted to Tandridge District Council by Oxted & Limpsfield Residents Group in June of 2015 commenting on the Green Belt Assessment Methodology.

- the failure to assess against Green Belt purpose 5 when these examples show that the land has fulfilled purpose 5
87. The consequence of the above is that for any given parcel, the amount of development in a parcel may be exaggerated and its contribution towards fulfilling the purposes may be significantly weakened. This could lead to inappropriate conclusions regarding whether land should be retained in the Green Belt.
88. The presence of the flaws in multiple parcel assessments also implies that these or similar flaws may also be present in the remainder of the parcel assessments. It is beyond the scope of this representation to review all of the parcel assessments.
89. Lastly, the context for the Delivery Strategies set out in Paragraph 11.0.1 is not robust because it:
- relies on a significantly inflated OAN as justification for the Delivery Strategies and the assessment of whether the Delivery Strategies fulfill the requirements of the NPPF. This inflated OAN is also used to score the Delivery Strategies in the Sustainability Appraisal and this leads to flawed conclusions regarding whether the Delivery Strategies fulfill sustainability objectives.²⁴
 - incorrectly paraphrases the requirement of the NPPF with regards to meeting need, for example, by omitting reference to housing market area and the clauses in NPPF 14 and 47 specifying “unless specific policies in this Framework indicate development should be restricted”.
 - confuses creating jobs with the provision of employment land.
90. As the justification and assessment of the Delivery Strategies is based on a flawed evidence base and an incorrect paraphrasing of the NPPF, any conclusions made in this document regarding whether the Delivery Strategies fulfill the requirements of the NPPF are also flawed.
91. The following sections contain detailed comments on each of the Delivery Strategies.

4.2 Delivery Strategy Approach 2a

Residential: Approach 1 + sites within the inset areas in the district (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Woldingham).

Commercial: Intensification of existing employment sites within the inset areas.

²⁴ For example, because the OAN is significantly inflated, the conclusion in the Sustainability Appraisal Report that the high development Delivery Strategies score more highly is not correct. Paragraph 1.11 of the Sustainability Appraisal Report states “*The six remaining approaches were assessed that consisted of varying levels of residential development in different locations. The assessment found that those approaches that would deliver high levels of development perform well....However, such approaches were found to perform relatively poorly against a number of other sustainability objectives, particularly the environmental objectives.*”

Objection to Approach 2a

Housing

92. This approach is not considered sound as it is not justified (the most appropriate strategy, when considered against the reasonable alternatives, based on the evidence).
93. Paragraph 11.0.2 states that the Settlement Hierarchy has been used, but this Delivery Strategy is not consistent with it. Delivery Strategy 2a includes Woldingham which is on a tier below Lingfield and Smallfield. Contrary to what is asserted in the Settlement Hierarchy, Lingfield and Smallfield are defined as Larger Rural Settlements in policy DP11 in TLP Part 2, while Woldingham is not.²⁵
94. This approach confuses whether an area is inset from the Green Belt with whether it is a sustainable location for development despite the fact that these are two different concepts which are assessed on very different criteria.
95. Areas can be inset from the Green Belt for reasons which have little to do with whether or not the area has sufficient critical mass of services, size, employment and infrastructure to be considered a sustainable location for development. In other words, an area might not be sufficiently open to be Green Belt, but it may still be an unsustainable location for development.
96. This Approach relies on a number of sites that are currently not in the Green Belt. The National Planning Policy Framework (NPPF) and evidence supporting the emerging Local Plan confirm that many of these sites are unsuitable for housing development.
97. As currently set out in the evidence base (HELAA), some of these sites are in existing uses which should be retained.

Existing Public Open Space

98. Some of the sites relied on to deliver Approach 2a are existing recreation grounds and playing fields.
99. For example, by cross referencing the HELAA, in Oxted, 65% of the anticipated dwellings relied on within Approach 2a would be from this source. This contradicts the NPPF (Para 74) which 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.
100. 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 with, for example, one of the potential housing allocations in

²⁵ Paragraph 2.4 of the Settlement Hierarchy incorrectly asserts that Woldingham is a Larger Rural Settlement under Policy DP11 in TLP Part 2. However, Policy DP11 states “Development within the Larger Rural Settlements of Smallfield and Lingfield ...” and does not mention Woldingham. This shows that Woldingham is not a Larger Rural Settlement in current planning policy.

Oxted (Mill Lane Playing Field) achieving a high score for quality and value (80% or more). 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).

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

102. This 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.

Other Uses

103. Other sites relied on in this approach are in existing residential use and will rely on rehousing existing residents and will not necessarily achieve a substantial net gain in dwellings.

Commercial

104. The amount of employment land shown in Delivery Strategy 2a is 3.2ha which is nearly three times the maximum need identified in the Tandridge Economic Needs Assessment, which states on page xi

Based on this ratio, between 0.1 to 1.2 hectares is estimated to be an indicative measure of the requirement for B1 land within the District up to 2033.

105. Page xiii of this same study states that there will an **excess** of industrial land of between 6.5ha and 7.9ha in the period up to 2033. While this is noted in paragraph 11.0.1, it is not clear how this excess has been taken into account in any of the Delivery Strategies.

106. The intensification of existing employment sites within the inset areas would ignore the recommendations made for the existing employment sites in the Economic Needs Assessment because most of the strategic and well-functioning employment sites are not located in the inset areas as shown in Figure E2 of the Economic Needs Assessments.

107. Therefore, the proposed approach conflicts with the evidence base and with the stated objective of supporting existing businesses.

Conclusion

108. Objection to Approach 2a as it is not considered sound because it is not

- justified (as it is not based on robust evidence – in particular the Open Space Assessment, 2015, the Economic Needs Assessment 2015 and the HELAA 2015 whose available sites it relies for delivery)

- effective (as the plan would not be deliverable over the plan period in the absence of sites which will not be considered suitable once all the factors required by Government are assessed)
- consistent with national policy as the plan requires sites which would contravene Government restraints

4.3 Delivery Strategy Approach 2b

Residential: Approach 1 + sites within the existing inset areas in the district built at a higher density (70dph).

Commercial: Intensification of existing employment sites within the inset areas.

Objection to Approach 2b

Housing

109. As this alternative follows the same approach as Approach 2a, it is not considered sound for the same reasons.

110. In addition, the application of a 'blanket' density of 70dph is unlikely to be considered a reasonable alternative in many locations. Whilst the NPPF (Para 58) states that the potential of a site to accommodate development should be optimised, this is against the background of the need to respond to local character and history, and reflect the identity of local surroundings. Thus it is unlikely that this Approach can be effective (deliverable over the Plan period).

Commercial

111. Same as Approach 2a

Conclusion

112. Objection to Approach 2b as it is not considered sound because it is not

- justified (as it is not based on robust evidence – in particular the Open Space Assessment, 2015, the Economic Needs Assessment 2015 and the HELAA on whose available sites it relies for delivery)
- effective (as the plan would not be deliverable over the plan period in the absence of sites or densities which will not be considered suitable once all the factors required by Government are assessed)
- consistent with national policy as the plan requires sites which would contravene Government restraints.

4.4 Delivery Strategy Approach 3

Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi rural service settlements (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Godstone).

Commercial: Intensification of all employment sites within the district.

Objection to Approach 3

Housing

113. As this alternative follows the same approach as Approach 2a, it is not considered sound for the same reasons.

114. In addition, this approach relies on deletion of the Green Belt to accommodate housing development. One of the Government's core planning principles is protecting the Green Belt (NPPF Para 17).

115. The NPPF (Para 14) states:

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

For plan-making this means that:

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

116. Further advice can be found in the NPPG 3-045 which states that the Strategic Housing Land Availability Assessment (known as the HELAA in this evidence base) should establish realistic assumptions about the land available and part of that assessment includes the Green Belt constraint [ed: emphasis added]:

*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.***

117. In addition, the NPPF (Para 83) states:

Once established, Green Belt boundaries should only be altered in exceptional circumstances...

118. By putting Approaches 3 - 6 forward, there is an implication that exceptional circumstances exist otherwise 3 - 6 are not reasonable alternatives. The Local Plan does not establish any exceptional circumstances and so an approach which relies on the deletion land from the Green Belt would be contrary to national planning policy.

119. Even if the District Council were to consider it appropriate to release land from the Green Belt, the methodology for assessing the established Green Belt is flawed as set out above and is not considered robust.

Commercial

120. This Approach delivers considerably in excess of the employment needs identified and so is not justified by evidence. The recommendations in the economic studies explain that local employment growth opportunities are limited and so there is no reasonable prospect of the excess employment land being used. The NPPF (para 22) discourages long-term retention of employment sites where there is no reasonable prospect of a site being used for that purpose and so this Delivery Strategy would be contrary to national policy.

Conclusion

121. Objection to Approach 3 as it is not considered sound because it is not

- justified (as it is not based on robust evidence – in particular the Open Space Assessment, 2015; the HELAA, 2015 or the Green Belt Assessment, 2015 on which sites and parcels it relies for delivery)
- effective (as the plan would not be deliverable over the plan period in the absence of sites which will not be considered suitable once all the factors required by Government are assessed)
- consistent with national policy as the plan requires sites which would contravene Government restraints

4.5 Delivery Strategy Approach 4

Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements (Bletchingley, Woldingham, South Nutfield, Dormansland, South Godstone, Tatsfield, Blindley Heath, Felbridge and Old Oxted).

Commercial: Intensification of all employment sites within the district.

Objection to Approach 4

Housing

122. As this alternative follows the same approaches contained within Approaches 2a and 3, it is not considered sound for the same reasons.
123. In addition, the Approach is likely to be less sustainable than Approach 3 as development would be located in settlements with even less facilities and services than the small urban areas of the District. As the Topic Paper states:
...the majority of services and facilities are gained from other settlements and there is more of a reliance on the need to travel than those settlements listed as semi-rural and urban.
124. Consequently, this approach would not be consistent with the NPPF (Para 34).
125. The conclusion that this approach is less sustainable is consistent with paragraph 9.3 of the Sustainability Appraisal Report which states in its assessment of Delivery Strategy 4 that:
..and due to the rural nature of the sites it also scores poorly against other key sustainability objectives such as reducing the need to travel, improving noise and light pollution, enhancing the landscape character and enhancing biodiversity.
126. The spread of the development to a large number of small communities will also add significant costs to any necessary infrastructure provision which has not been factored into the site assessments.

Commercial

127. Same as 3.

Conclusion

128. Objection to Approach 4 as it is not considered sound because it is not
- justified (as it is not based on robust evidence – in particular the Open Space Assessment, 2015; the HELAA, 2015 or the Green Belt Assessment, 2015 on which sites and parcels it relies for delivery)
 - effective (as the plan would not be deliverable over the plan period in the absence of sites which will not be considered suitable once all the factors required by Government are assessed)
 - consistent with national policy as the plan would require sites which would contravene Government restraints and sustainable development objectives

4.6 Delivery Strategy Approach 5

Residential: Approach 1 + Approach 2a + Approach 3 + Approach 4 (this scenario is based on maximum capacity).

Commercial: Intensification of all employment sites within the district.

Objection to Approach 5

Housing

129. As this alternative follows the same approach contained within Approaches 2a, 3 and 4 it is not considered sound for the same reasons.
130. In addition, this approach relies on deletion of the Green Belt to accommodate housing development and attracts the same objections as Approaches 3 and 4.

Commercial

131. Same as 3.

Conclusion

132. Objection to Approach 5 as it is not considered sound because it is not
- justified (as it is not based on robust evidence – in particular the Open Space Assessment, 2015; the HELAA, 2015 or the Green Belt Assessment, 2015 on which sites and parcels it relies for delivery)
 - effective (as the plan would not be deliverable over the plan period in the absence of sites which will not be considered suitable once all the factors required by Government are assessed)
 - consistent with national policy as the plan would require sites which would contravene Government restraints

4.7 Delivery Strategy Approach 6

133. A large urban extension or new settlement.
134. Approach 6 raises the potential of a new town or sustainable large urban extension to meet development needs. This approach does not propose a location, set out a potential development yield or rely on the existing settlement hierarchy.

Objection to Approach 6

Housing

135. This approach is not considered a reasonable alternative as it would not be deliverable in the absence of sufficient significant available sites for housing development. This approach would require significant infrastructure investment and provision to be viable and is also not capable of contributing sufficiently to housing delivery other than possibly in the latter part of the Plan period. The approach would also require the significant release of Green Belt land in one location to establish a critical mass of development.

Commercial

136. No information is available within this approach.

Conclusion

137. Objection to Approach 6 as it is not considered sound because it is not

- justified (as it is not based on robust evidence – in particular the Green Belt Assessment, 2015 on which parcels it relies for delivery)
- effective (as the plan would not be deliverable over the plan period in the absence of available and suitable sites once all the factors required by Government are assessed)
- consistent with national policy as the plan would require a site which would contravene Government restraints and may not locate development where the need to travel will be minimised and the use of sustainable transport modes can be maximised

5.0 Comments on Chapter 12 The Place

138. We have explained in previous sections of this representation how the approach taken in these emerging Local Plan documents is fundamentally flawed and so provides an inappropriate basis for developing a sound Local Plan. We include comments on this Chapter because it also highlights how the existing adopted Tandridge District Local Plan Part 2 (adopted in July 2014) appears to have been ignored when preparing the Issues and Approaches despite it being part of the adopted Development Plan.

139. The approach to developing the policies should be:

- evidence-based and reflect the distinctive characteristic of Tandridge
- consistent with national policy
- consistent with the adopted Development Plan, including TLP Part 2 and any Neighbourhood Plans.
- reflect the needs and priorities of local residents.

140. Similarly to the analysis above, we highlight three policy categories – economy, town centre/retail and landscape/natural environment -- that illustrate how these criteria have not been fulfilled. The consequence of all of this is that this chapter is also not an appropriate basis on which to develop a sound Local Plan.

Approach 1 : Economic and Tourism Planning Policies

141. The choices are inconsistent with the evidence base, national policy and the characteristics of Tandridge and so are not reasonable alternatives:

A: Does not reflect the economic studies nor the distinctive characteristics of Tandridge.

B: Does not reflect the recommendations in the evidence base, for example it would have to be updated to reflect the addition and re-categorisation of the sites beyond the two identified in CSP 22.

C: Does not reflect the evidence base because the Delivery Strategies show that the result of the “intensification” delivers employment land considerably in excess of

the need identified in the economic studies. As explained earlier, this is contrary to the NPPF.

D: This is vague and there is no support in the evidence base for what the tourism offer might comprise. It is therefore unlikely that any policy written from this poorly defined starting point would be effective (i.e. deliverable over the plan period).

Approach 4: Town Centres/Retail and Leisure Planning Policies

142. The paraphrasing included in Paragraph 12.1.4 of the recommendations in the Retail and Leisure Study is inconsistent with the Study itself, in particular:

143. Paragraph 12.1.4 of the Issues and Approaches document states:

Overall, the study suggested that our [Tandridge District Council] current approach is broadly appropriate for planning for retail and leisure until 2033, but recommended some changes and additions to our current policy, including

....

- *Extend the Warlingham Local Centre boundary;*
- *Identify Godstone as a Local Centre and define the Local Centre boundary;*

144. However, paragraph 6.15 of the Retail and Leisure Study states that no changes are necessary and so the above two bullet points are incompatible with the evidence base[ed: emphasis added]

*....The Town Centre and Local Centre boundaries are currently drawn consistent with the NPPF and **no changes are considered necessary**. Although an extension to Warlingham **could be considered**. Godstone **could be** designated as a Local Centre.*

In addition, this section appears to take no account of TLP Part 2 Policy DP2 regarding town centres.

These are further examples of the inconsistency between the Issues and Approaches document and the evidence base.

Approach 7: Environmental Design

Approach 8: Landscape Planning Policies

Approach 9: Biodiversity and Geodiversity Planning Policies

Approach 12: Green Belt Planning Policies

145. We have grouped these together because our comments are similar on all of them.

146. 7.A, 8.A, 9.A, 12.A: Relying on the NPPF does not reflect the distinctive characteristics of Tandridge nor the priority placed on preserving the Green Belt, AONB, locally distinctive landscapes, biodiversity and natural habitats in the NPPF and by local residents. This approach also appears to be inconsistent with TLP Part 2 which contains policies for all of these areas, some of which already incorporate wording from the NPPF.

147. 6.B, 8.B, 9.B: We support the retention of Core Strategy Policies that seek to retain and enhance the distinctive characteristics of Tandridge, including, but not limited to, CSP 17, 18, 20 and 21. This is consistent with the distinctive characteristics of

Tandridge and the priority placed on retaining these distinctive characteristics that we identified earlier,

148. 2.B: overlaps with TLP Part 2 policies DP10 to DP17 which cover the Green Belt. TLP Part 2 is part of the Development Plan and was adopted in July 2014 and Examined under the NPPF. There is no explanation as to why additional Green Belt policies are needed in the emerging Local Plan. The Core Strategy does not contain additional Green Belt policies. Policies in TLP Part 2 already specify where infilling is allowed.
149. TLP Part 2 also includes adopted policies on heritage, open spaces, building standards, flooding, biodiversity and others which this chapter indicates that the emerging Local Plan is also proposing to address.²⁶ This is not a question of “strategic” versus “detailed” and instead is another example of how the emerging Local Plan is either inconsistent with or seems to ignore the evidence base which includes TLP Part 2.
150. Including overlapping and potentially conflicting policies on the Green Belt (and in other policy topic areas²⁷) adds an unnecessary layer to the planning process and introduces a level of uncertainty which we believe conflicts with paragraph 17 of the NPPF which states that planning policies should allow decisions to be made with:
a high degree of predictability and efficiency
151. 8.C: Removing the AGLV designation is inconsistent with the priority placed on protecting high quality landscapes and countryside by local residents, and so in addition to CSP 20 and 21, we request that the emerging Local Plan also incorporate Local Landscape designations which would reinforce and preserve the distinctive local landscapes in Tandridge as well as reinforcing the integrity of the AONBs.
152. 8.D, 9.C: There is insufficient detail to be able to assess whether any such policy could either be effective or consistent with national policy.
153. 7.E: We do not support the allocation of specific sites for large scale energy regeneration because Tandridge does not have the necessary infrastructure or attributes to support either large scale conventional or renewable energy generation.

Approach 15: Infrastructure

154. Any policies should ensure that the existing infrastructure deficit is addressed and that no new development occurs unless the necessary infrastructure is put in place. This is consistent with the Issues that we have included above.
155. In summary, we support the retention of all Core Strategy policies that seek to retain and enhance the distinctive landscape, heritage and character of Tandridge. Introducing additional layers of policy that overlap with the recently adopted policies in TLP Part 2 with regards to Green Belt, heritage, biodiversity, flooding and other

²⁶ The Council has also spent considerable sums of public money successfully defending TLP Part 2 in the courts.

²⁷ In addition those listed here, the overlaps are: Approach 4 and DP2 and DP3, Approach 5 and DP18, Approach 6 and DP5 and DP7, Approach 7 and DP21, DP22, Approach 10 and DP19, Approach 11 and DP20, Approach 13 and DP21. These overlaps are more than just the difference between “strategic” and “detailed”.

topics, is unnecessary and not compatible with the NPPF which requires the planning system to be efficient and predictable. Our comments reflect the character of Tandridge, the evidence base and national policy and the high priority that local residents place on protecting the distinctive characteristics of Tandridge.

6.0 Conclusion

156. The Issues and Approaches document is not sound because the approach is not justified or consistent with national policy. The proposed list Issues are not supported by the evidence base and do not reflect the objectives of the NPPF, or the distinctive characteristics of Tandridge.
157. When the evidence base is considered, a very different picture of the District and the issues facing the District emerges. More houses are likely to exacerbate these issues with the result that Tandridge becomes a dormitory district where the private car continues to be the dominant mode of travel even where alternatives exist. This disconnect must be corrected otherwise the Local Plan will neither be appropriate for Tandridge or compatible with the NPPF.
158. The Delivery Strategies are not sound because they are not justified, effective or consistent with national policy and rely on evidence documents that we consider to be not fit for the purpose of developing a sound Local Plan. These include, but are not limited to, the OAN Paper, the HELAA and the Green Belt Assessments.
159. The remainder of the policy approaches either conflict with or ignore the evidence base, including TLP Part 2 which is a recently adopted part of the Development Plan and which includes policies for a number of areas that it would seem the new Local Plan is also intending to cover, but without regard for TLP Part 2 or justification for the overlap.
160. All of this means that the emerging Local Plan documents are not soundly based and that the approaches do not fulfill the sustainability objectives of the NPPF.

Appendix 1: Detailed analysis of the Issues

This section is a detailed analysis of the Issues proposed in the document.

As explained in the main document, the Issues should be important matters for debate that:

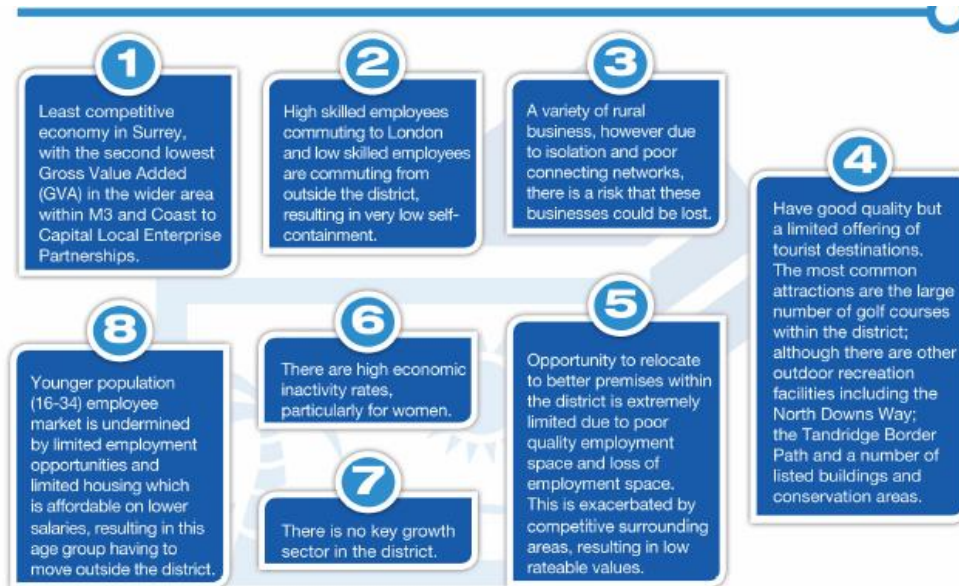
- are evidence-based (as required by the NPPF)
- identify any Tandridge-specific attributes that may affect how the sustainability objectives of the NPPF can be achieved
- reflect the distinctive characteristics of Tandridge (without this, the Local Plan cannot be appropriate for Tandridge)
- reflect the priorities of local residents (NPPF paragraph 1)

None of the proposed Issues are cross-referenced with the evidence base, and so this section analyses each of the proposed Issues by cross-referencing it with the relevant information in the evidence base.

This analysis shows that of the 73 issues listed, many either conflict with the evidence base or are not supported by it. Others are general statements of fact or wider trends with no justification given as to why these have been included as opposed to any other wider trend and also no indication as to whether the issue can be addressed by the Local Plan.

When the evidence base is considered, a different picture of the District and of the issues facing the District emerges than that implied by the proposed Issues. This fundamental disconnect must be corrected otherwise the Local Plan will not fulfill the objectives and requirements of the NPPF, or be appropriate for Tandridge.

1.0 Economy and Tourism



Issue 2: The evidence base shows that 39.1% of the people who work in Tandridge live in the district¹. This was also recognised in the Core Strategy. However, the assertion that the reason for low self-containment is that high skilled commute out of the district and low skilled commute into the district is not supported by the evidence base.

What the evidence base does show is that one factor specific to Tandridge that may have contributed to low self-containment is that Tandridge has experienced higher rates of house building than England² which was combined with the loss of large local employers as explained in the Tandridge Economic Development and Business Study [ed: emphasis added]:

*2.6.1 As part of the background research a previous economic development strategy position statement produced in the mid-1990's was located. Within the appendices a table of major employers was published listing over 30 major employers based within the District. **Regrettably the majority of these are no longer based within the District and in many cases the sites they occupied have been redeveloped for residential use.***

The loss of large employers was part of a wider corporate and public sector re-structuring trend and so not specific to Tandridge. These now redundant large employment sites were redeveloped into housing.

¹ Tandridge Economic Needs Assessment, paragraph 3.3.4.

² Strategic Housing Market Assessment: Analysis of Market Signals, Figure 3.13.

The SNPP Population Projections and the OAN Paper show that local population growth (natural change) is very low in Tandridge and also that rates of housebuilding and inward migration are linked. The population increase due to the inward migration that was stimulated by the high rates of housebuilding was not accompanied by local jobs growth, and that may have contributed to Tandridge having a low self-containment measure.

Issues 3 and 5: While we recognise that there is a risk that a business could be lost at any time anywhere and not just in Tandridge, the assertion that the rural businesses in Tandridge are “isolated” or have “poor connecting networks” is contradicted by the evidence base.

In particular, the survey conducted in the Tandridge Economic Development and Business Study 2014 shows that the majority of businesses in Tandridge have been operating for more than 10 years³. This is worth noting because these businesses survived the 2008 financial crisis and subsequent recession which is a significant achievement. These businesses also see mostly advantages to operating in Tandridge⁴ and have not experienced either economic⁵ or physical (e.g. premises, roads) or legislative barriers to operating in Tandridge.⁶

The Tandridge Economic Needs Assessment⁷ states that [ed: emphasis added]:

*Most [ed: designated – Lambs Business Park and Hobbs Industrial Estate and non-designated employment sites] have **good/very good access to the strategic road network** which is very important for a rural district and are in adequate condition, being identified as either in “**very good to good**” or “**average**” condition, with a small number in poor to very poor condition...*

*During the field survey low levels of B1 office vacancy was observed in most rural locations which could suggest **that the space available in these locations are fit-for-purpose and meet businesses’ commercial and technology requirements.***

Issue 4: The conclusion that Tandridge offers “limited” recreational opportunities is contradicted by the evidence base, for example the Open Spaces Assessment. In addition, the Surrey Hotels Futures 2015 Study and other unique local attractions include:

- the 4 star Marriott golf/spa/resort hotel located at the Lingfield Park race course which opened in 2005.⁸ Lingfield Park race course pioneered the concept of an all weather race course and is still only one of four all

³ Tandridge Economic Development and Business Study, June 2014, Table 23 Age of business by sector.

⁴ Tandridge Economic Development and Business Study, June 2014, Figure 6 Advantages/disadvantages of trading in Tandridge

⁵ Tandridge Economic Development and Business Study, June 2014, Figure 13 Economic barriers

⁶ Tandridge Economic Development and Business Study, June 2014, Figure 14 Physical and legislative barriers

⁷ Tandridge Economic Needs Assessment 2015, page ix.

⁸ Surrey Hotels Futures Study, page ii. Lingfield Park hotel and race course web-sites.

weather race courses in the UK. The race course itself hosts nearly 300,000 visitors annually.

- Godstone Farm, which attracts 226,000 visitors annually and includes a wide range of family-oriented activities.⁹
- British Wildlife Centre, which is home to a collection of native species housed in large enclosures that reflect their native habitat. It is a 2015 tripadvisor Certificate of Excellence Winner and includes a picnic area, nature talks and children's activities. It is also wheelchair accessible.

The assertion that golf courses are “the most common attractions” is not quantified and so not supported, and is also contradicted by the above list.

Issue 6: This is not supported by recent labour force surveys¹⁰ which show that both the economic activity and inactivity rates for women in Tandridge are similar to other Surrey districts and also similar to the average across Great Britain.

Issue 8: There is nothing in the evidence base to support the assertions and some evidence to the contrary.

First, the evidence base shows that Tandridge has a relatively low unemployment (JSA claimant) rate overall, and an improving rate within the 16-24 age range¹¹. The 2011 Census data shows similar economic activity rates for this age group between Tandridge, Surrey and England.¹²

We could find no support for the assertion that there are high levels of out migration in the younger age groups. Although not in the evidence base, Tandridge commissioned a report from GL Hearn¹³ which shows net *inward* migration for *all* age bands except ages 15-19 with the latter perhaps being due to limited secondary/further education provision in Tandridge as shown in the evidence base.

Conclusion: The proposed list of issues is contradicted by the evidence base which shows a relatively stable local economic base comprised of long-term local businesses that see mostly advantages to operating in Tandridge. Economic participation rates for younger age groups and women are average and there is also no support for the assertion that younger age groups are leaving Tandridge.

The evidence base shows limited prospects for economic growth, however, which has significant implications for achieving the NPPF objective of locating “jobs near homes”. While this objective is acknowledged in the evidence, the implications arising from it and

⁹ Surrey Hotels Futures Study, paragraph 5.1.12

¹⁰ Annual Population Survey area profile via nomis, Sept 2015.

¹¹ Functional Economic Area Topic Paper, page 9.

¹² 2011 Census, DC601EW, England, Surrey, Tandridge.

¹³ GL Hearn Report, July 2013, Locally Generated Housing Needs Assessment, Sept 2013, Figure 24, which was received by Tandridge District Council. This chart relies on past migration trends for each age band to generate future trends, and as the future trends show net inward migration, so must the past.

limited local employment growth have not been carried forward in the Delivery Strategies, particularly those showing high rates of housing development.

Housing



Issue 1: This assertion contradicts the evidence base¹⁴ which shows that younger households in Tandridge **are more likely to own** their own property (44.7%) with a loan than in Surrey (38.5%) or the national average (30.5%). This is explained in paragraphs 2.15 and 2.16 of the Strategic Housing Market Assessment: Addressing the Needs of All Households Technical paper [ed: emphasis added]:

Ownership with a mortgage or loan is generally more frequent, and around 45% of younger households with a HRP aged 34 and under own their property through this tenure...

Notably, this is higher than the national figure of 30.5%, suggesting that younger households in Tandridge are more likely to own their property with a mortgage than the national average, despite the district's considerable affordability challenges. Tandridge also surpasses the figure for Surrey.

Second, there is no support in the evidence base that people in general are “priced out of the market.” What the evidence base does show is that those working outside the district

¹⁴ Strategic Housing Market Assessment: Addressing the Needs of all Household Types, Figure 2.5 Tenure by Age of HRP 2011

earn an average of 22.5% more per week than those working in the district, which is a much greater disparity than in the South East or Great Britain.¹⁵

One possible reason for this higher disparity could be the lowering of the average local wage calculation due to the loss of higher skilled local employment explained earlier calculated on a small employment base. This lost local higher wage employment was not replaced and this means that the local average wage calculation will be lower.

This evidence implies that housing in Tandridge is more affordable for people who work outside the District, but this is not what any of the Issues say. Adding to the housing stock cannot remedy this disparity while also turning Tandridge into a dormitory or commuter district.

Issues 2, 3 and 4: The trend for a higher proportion of people to own their own homes as they get older is not specific to Tandridge because the ONS data shows that it applies to all of England and Wales¹⁶ and that Tandridge is about average in that context.

There is no income/age distribution data in the evidence base and so the assertion that Tandridge has a particularly “wealthy” aging population is not supported by evidence.

The evidence base¹⁷ shows that the number of bedrooms in household spaces is very similar to that of Surrey. The comparison with the England average is not relevant because it includes a number of large urban and suburban areas.

The evidence base also shows that there has been 20% growth in flatted and other similar types of development in Tandridge and only 1.5% growth in detached between 2001 and 2011.¹⁸ The evidence base also shows that the private rented sector has increased by 78.8% between 2001 and 2011 and so now around 10% of all households in Tandridge rent privately.¹⁹ While the evidence base shows that Tandridge has a much higher proportion of home ownership with a loan in the 16-34 and 35-49 age groups than either

¹⁵ Tandridge Economic Needs Assessment, Table 3-6, paragraph 3.7.2.

¹⁶ Home ownership and renting in England and Wales – Detailed Characteristics, 2011 Census data, Office for National Statistics (ONS)

¹⁷ Strategic Housing Market Assessment 2015: Addressing the Needs of All Households, Figure 2.2 Number of Bedrooms in Household Spaces 2011. As the existing housing stock and tenure profiles are based on facts and recent Census data, we have taken them to be correct. However, it is important to note that this document states that the OAN figures have been incorporated without independent scrutiny according to footnote 13. We explain in Appendix 2 that both the OAN method and calculations are fundamentally flawed, and so the future needs of all households presented in this document would also be flawed.

¹⁸ Strategic Housing Market Assessment 2015: Addressing the Needs of All Households, Figure 2.1 Change in Household Spaces by Type 2001-2011.

¹⁹ Strategic Housing Market Assessment 2015: Addressing the Needs of All Households, paragraph 2.9 and Figure 2.3 Change in Tenure 2001-2011.

Surrey or national averages, the remaining tenures are not dissimilar to the rest of Surrey.²⁰

All of these factors indicate the market offers more choice at all levels than that implied by the proposed list of issues.

Issue 5: Avoiding an undue concentration is recognised in Core Strategy Policy CSP 7 as shown by the following:

The Council will encourage the provision for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location.

There is no evidence in the evidence base that a concentration exists today.²¹ Inclusion of this issue also implies that CSP 7 was not an effective policy and there is no evidence to show this. A search of schemes permitted under the Core Strategy shows other communities, such as Warlingham, have also experienced growth in this type of accommodation, and so it is unclear why only Caterham has been noted.

Conclusion: Most of the proposed issues are either contradicted or not supported by the evidence base. When the evidence base is cross-referenced, the attribute that emerges is that wages outside of Tandridge are higher than those in the District. Increasing the housing stock in Tandridge could exacerbate this disparity and turn Tandridge into a dormitory district.

²⁰ Strategic Housing Market Assessment 2015: Addressing the Needs of All Households, Figure 2.5: Tenure by Age of HRP 2011.

²¹ See the section entitled “Existing Housing Stock” in the Strategic Housing Market Assessment 2015: Addressing the Needs of All Households Technical Paper which has no mention of an undue concentration of elderly accommodation.

Town Centres/Retail and Leisure



Issue 1: Only the first part of this assertion is supported by the evidence base²². The Tandridge Retail and Leisure Study explains that the overall vacancy rate of 8.6% is lower than the Goad national average of 11.8%.²³ This contradicts the assertion that there is less demand for units within the town centres.

Issue 2: While this may be a wider trend, its significance both overall and in Tandridge is dampened considerably by the Tandridge Retail and Leisure Study which explains [ed: emphasis added]:

*3.15 On-line shopping has experienced rapid growth since the late 1990s but in proportional terms the latest available data suggests it remains an **insignificant percentage of total retail expenditure**.*

*3.16 The household survey results suggest **5.3%** of households in the Tandridge study area did their last main food and grocery shopping via the internet/delivery, and **8.8%** of households do most of their non-food shopping at home via the internet, TV or catalogue. **These figures represent a lower proportion than the internet's share of retail expenditure (about 12% in 2013 – Experian, October 2014).***

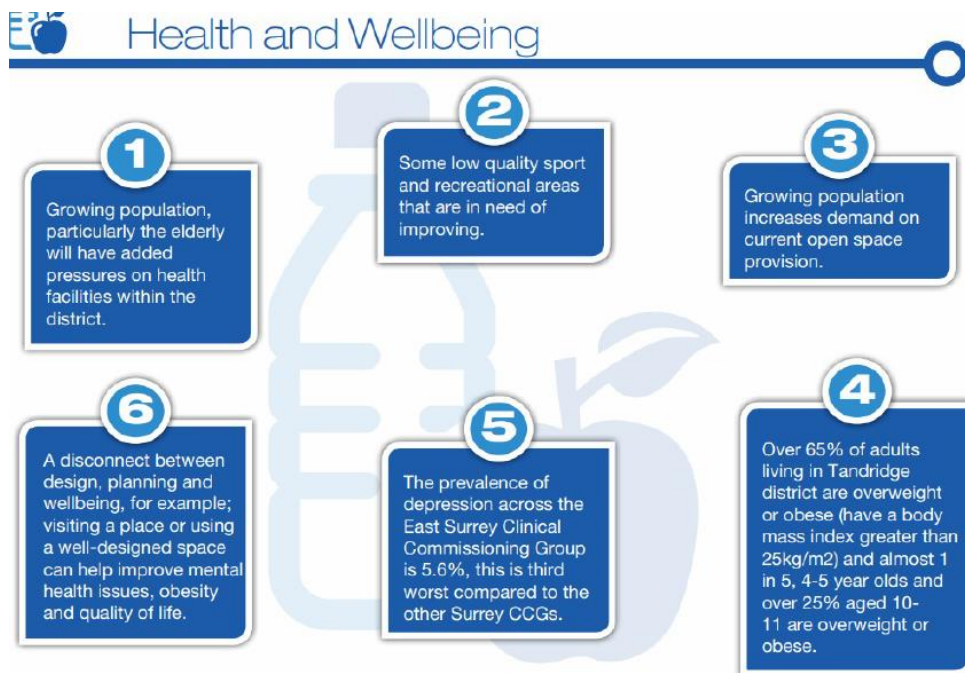
²² Tandridge Retail and Leisure Study Final Report, e.g. paragraphs 3.5, 3.61 and 3.73.

²³ Tandridge Retail and Leisure Study Final Report, paragraph 5.13.

Issues 3 and 4: There is no evidence that supports the assertion that “younger generations are more likely to go to Croydon and Crawley.” The lack of public transport, particularly in the evenings, means that practically speaking, travel to these destinations would be restricted to those who have cars.

Conclusion: There is no support in the evidence base for most of the Issues in this category. However, there is support for the fact that competition from town centres and employment outside of Tandridge will constrain the expansion of town centres and employment within Tandridge and this should be reflected in any employment projections.

Health and Wellbeing



Issue 2: This Issue is not supported by the evidence base which notes that overall quality of playing fields was generally very high, the overall quality of play was high, natural/semi-natural/amenity open space was generally either very good or good.²⁴

Issue 3: This is more a statement of fact.

Issue 4: The evidence base shows this is a wider societal trend and so not specific to Tandridge. However, the evidence base explains that Tandridge has a lower proportion of obese adults than the national figure²⁵ but this fact has not been noted.

²⁴ District Open Space Assessment 2015, paragraph 6.3.3, 6.3.5, 6.3.8, 6.3.10.

²⁵ District Open Space Assessment 2015, paragraph 3.2.7 states that “The data reveal that 18% of the adult population living in the District is obese by official measures. This is lower than the national figure of

The District Open Spaces Assessment also shows that life expectancy in Tandridge is higher than the South East or England average and that more people living in the District reported to be good general health in the 2011 Census than either the regional or national average and that sports participation rates in the District are also higher²⁶ Paragraph 3.2.5 of the Assessment states

The reasons for using open spaces show very clearly the importance residents place on open spaces for health and exercise benefits...Arguably all of the reasons identified for visiting open spaces have positive health outcomes by providing the opportunity for people to do something they enjoy.

The above average health of the local population is further supported by Chapter 4 of the 2014 July East Surrey CCG Strategy and Operating Plan in its overview of population which states that East Surrey has:

A generally healthier population, compared with the England average

This is further confirmed by Figure 5 of this presentation which shows the prevalence in East Surrey for the vast majority of major illnesses is lower than either for the comparator CCGs or for England as a whole.

Issue 5: There are only six CCGs in Surrey and so East Surrey being “third worst” implies that East Surrey is about average on this measure. This is not what is implied by Issue 5.

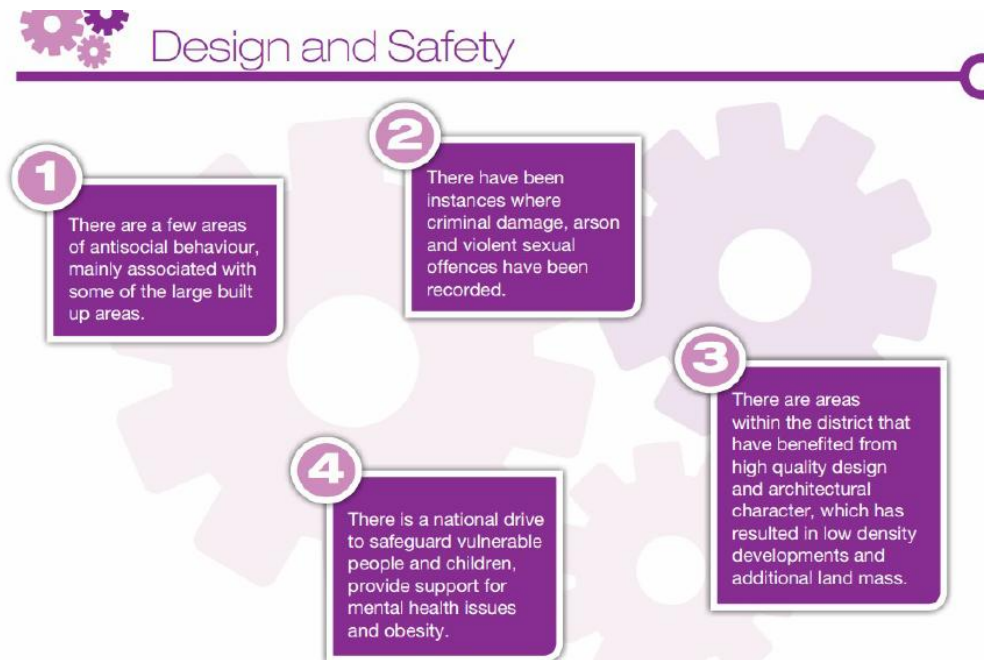
Issue 6: This is not an Issue.

Conclusion: The Issues imply that existing open spaces are generally low quality, however the evidence base shows that the open spaces are generally of high quality. This list also implies that there are mental health, obesity and quality of life issues in Tandridge, but this is contradicted by the evidence base which shows that Tandridge has a generally healthier population, lower obesity rates and longer life expectancies than comparator groups, Surrey, or the national average.

23%. However, the proportion of adults estimated to be over-weight at 45% is a little higher than the national figure of 41%.

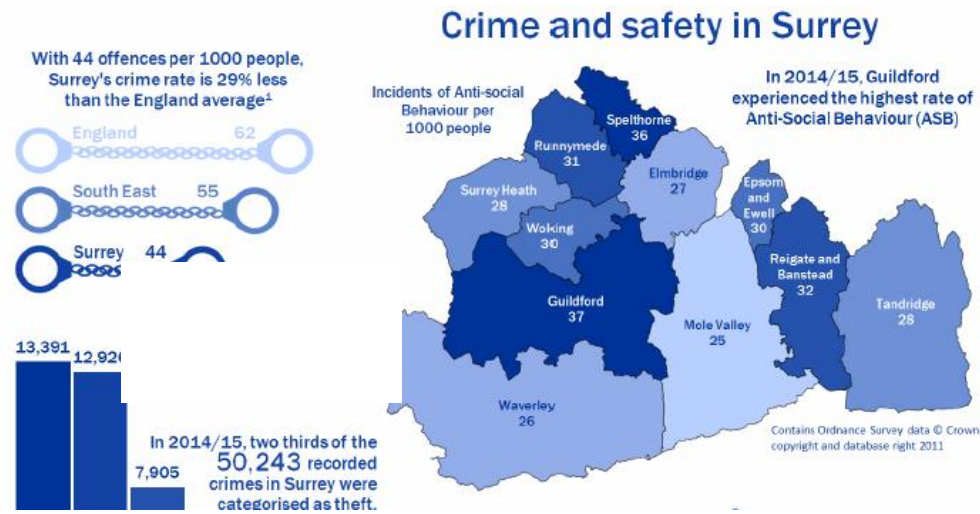
²⁶ District Open Space Assessment 2015, Table 6, paragraph 3.2.1-3.2.3

Design and Safety



Issues 1, 2 and 4: Contrary to what is implied by these issues, Tandridge has no large built up areas and is statistically a very safe and crime free part of England and Surrey, and so this list is not of particular significance to Tandridge. In addition, this list includes general statements of fact that could apply to any area, rather than important matters that are specific to Tandridge.

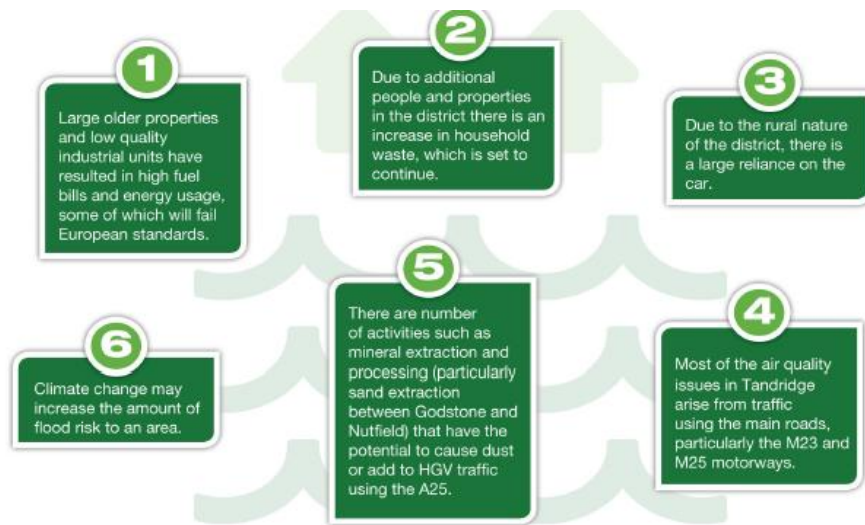
For example, the following chart shows that crime rate in Surrey is lower than the England average and that within that lower average, Tandridge has one of the lowest rates of Anti Social Behaviour per 1000 population.



Issue 3: It is not clear to what this issue is referring.

Conclusion: Contrary to the portrayal in this section, the evidence base shows that there are no Tandridge-specific issues with regards to crime. Preserving the distinctive character of the settlements has long been recognised in local planning policy, but Issue 3 does not state this. Including distinctive character in the same category as “crime” is inappropriate and also does not reflect the importance attached to it by local residents, the NPPF and the current Development Plan (Core Strategy 2008, TLP Part 2, and emerging Neighbourhood Plans).

Climate Change



Issue 1: This is not supported by the evidence base. The comparison statistics for higher average energy usage appear to not have been adjusted to account for the higher proportion of detached dwellings in Tandridge which would impact average energy usage.²⁷ There is no reference that identifies the European standards mentioned in this assertion.

The evidence base notes that with regards to office space there is evidence of new provision and older units being refurbished to meet modern specifications.²⁸

As highlighted previously, the evidence base shows that local businesses have not experienced issues with physical barriers, e.g. premises, and so this assertion is not supported by evidence. As explained earlier, the economic studies indicate that most businesses consider their premises fit for purpose.

Issue 2: This is not an issue specific to Tandridge and so it is not clear why it has been highlighted.

Issue 4: This appears to be a statement of fact, but we could find no evidence to support it because the evidence base also appears to include just another assertion.

Issue 5: This is an unquantified statement of a possibility.

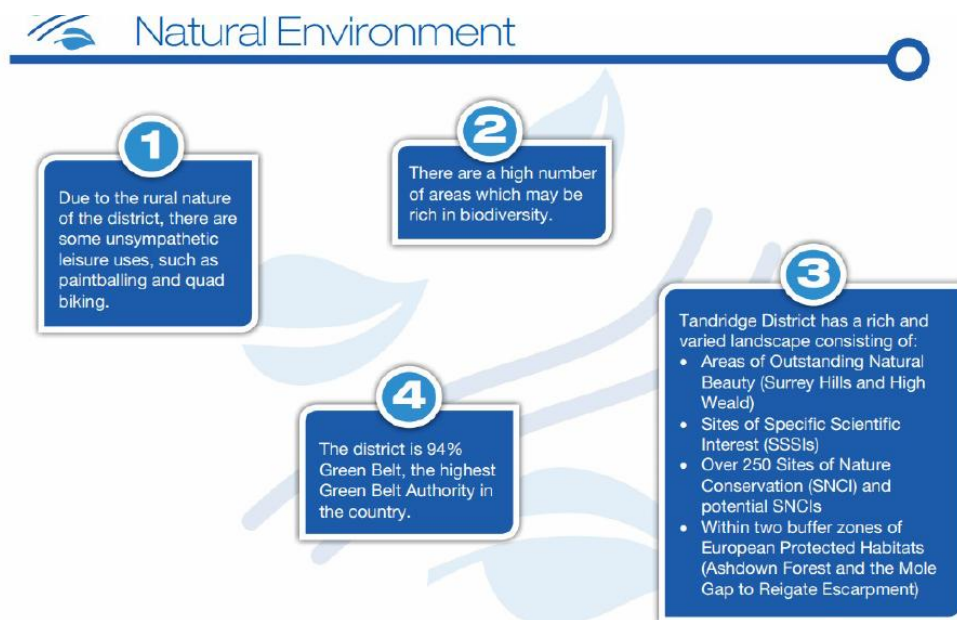
²⁷ Strategic Housing Market Assessment 2015: Addressing the Needs of All Households, paragraph 2.8.

²⁸ Tandridge Economic Needs Assessment, paragraph 4.12.2, "There is evidence that provision of higher quality small office units has recently expanded, with a mix of new provision and older units refurbished to meet modern specifications as illustrated in Figure 4-1."

Issue 6: This issue is not specific to Tandridge. The impacts of climate change on Tandridge (and elsewhere) extend beyond flood risk, so it is not clear why only flood risk has been highlighted here. For example, surface water flooding and drought are two additional effects that could affect Tandridge because Tandridge is located in the water-stressed SouthEast and the evidence base shows there are surface water flooding issues. 60% of Tandridge is agricultural land, and climate change is also likely to impact farming in a number of ways but these have not been identified.

Conclusion: The list is repetitive and overlaps with other areas. However, if it is intended to be comprehensive, then it omits a large number of effects that may or may not be within the scope of the new Local Plan to address.

Natural Environment



Issue 1: We could find no mention of paintballing or quadbiking in the evidence base²⁹. The business directory listings in the Tourism “Guide to Tandridge” hosted on the Tandridge District Council web-site include one paintball facility and one private quad bike park hosted on a diversified farm. Nor is it clear why these activities should be regarded as “due to the rural nature of the district”, which creates the impression that it is the rural character of Tandridge which is somehow at fault.

Issue 2: The word “may” is contradicted by evidence. The evidence base shows that there are in fact a large numbers of areas which have been shown to be rich in

²⁹ Tandridge Retail and Leisure Study, District Open Spaces Assessment, Economic Needs Assessment, Economic Development and Business Study or Surrey Hotels Future Study.

biodiversity, for example, as shown in the maps that accompany the Surrey Landscape Character Assessment 2015.

Issues 3 and 4: These are statements of fact and not issues.

The distinctive characteristic of Tandridge is its natural environment, yet this is one of the shortest sections, which seems to indicate that little weight is being attached to the natural environment in the emerging Local Plan.

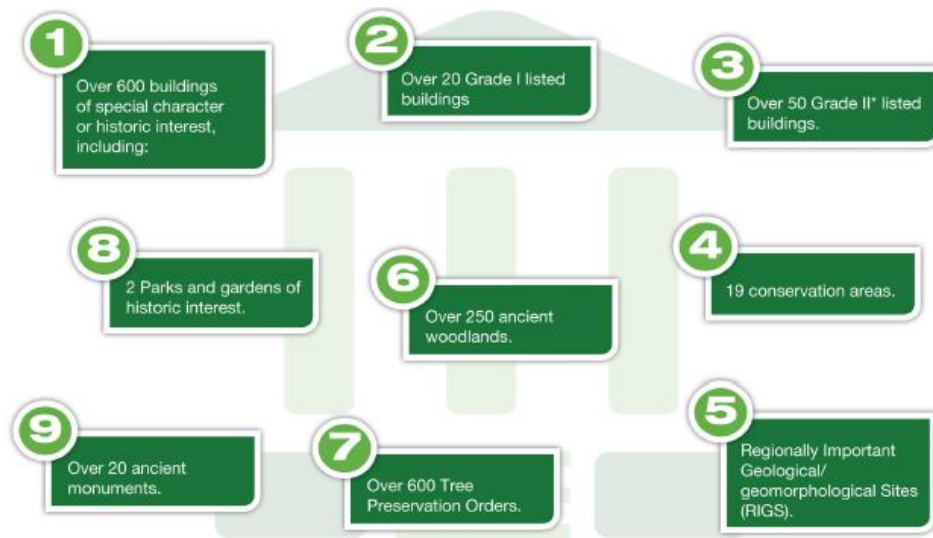
Further support for what appears to be the low priority accorded to the natural environment is shown by the dismissal of the comments from Natural England regarding inclusion of SSSIs as Tier 2 constraints as shown on page 59 of the Spatial Approaches Topic Paper. Natural England states [ed: emphasis added in bold]:

*“We are however concerned that SSSIs in your Local Authority are only deemed to be “orange” or second tier constraints. We **strongly believe that the SSSIs within your area** should be identified as “red” constraints in this Constraints paper. The National Planning Policy Framework emphasises the importance of SSSIs at paragraph 118 as follows: “proposed development on land within or outside a SSSI likely to have an adverse effect on a SSSI (either individually or in combination with other developments) should not normally be permitted....*

Despite this, SSSIs are still Tier 2 constraints because the Spatial Approaches Topic Paper concludes that SSSI losses from development can be “mitigated.”

Conclusion: This is not a list of issues affecting the natural environment in Tandridge. This is surprising given the natural environment is one of the distinctive characteristics of Tandridge which is given high priority both in the NPPF and also by local residents.

Heritage



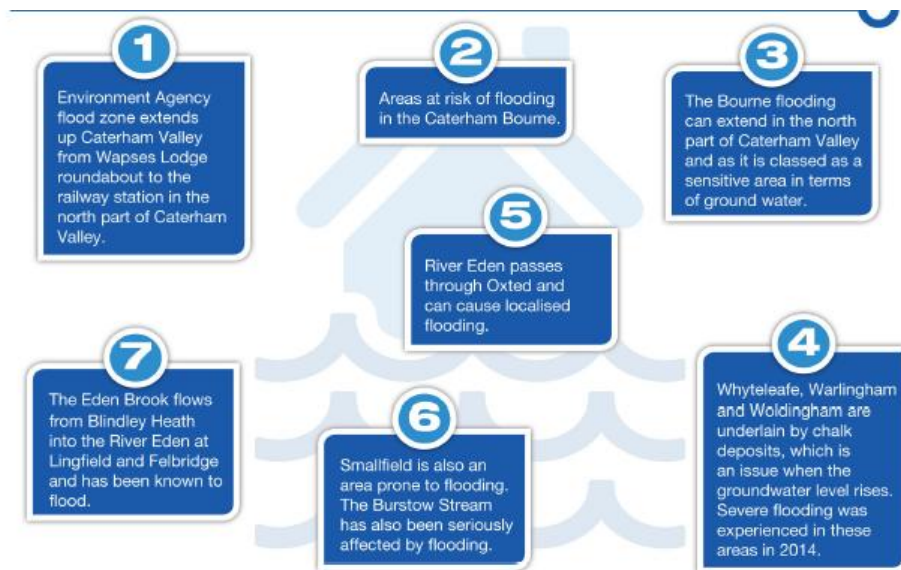
These are all statements of fact that we assume are correct and so are not matters for debate. As with the natural environment, there appears to be a low priority given to heritage. This is shown by the inappropriate characterisation of heritage issues as explained in comments from Heritage England on page 110 of the Sustainability Appraisal Scoping Report as follows [ed: emphasis added]:

*Unfortunately, this section [ed: in the SEA] currently reads as **if the heritage is the issue rather than part of the solution to achieving sustainable development.** Is the statement regarding conservation of the historic environment being important for quality of life really an “issue”. Is not the issue the potential loss or decline in significance or character of the historic environment and the problem how to address this through the SEA and the local plan policy?*

The wording alteration suggested in the Council’s response, in our view, still makes heritage appear to be a “problem” rather than part of the solution to achieving sustainable development as envisioned by the NPPF.

Conclusion: This is not a list of issues affecting heritage in Tandridge.

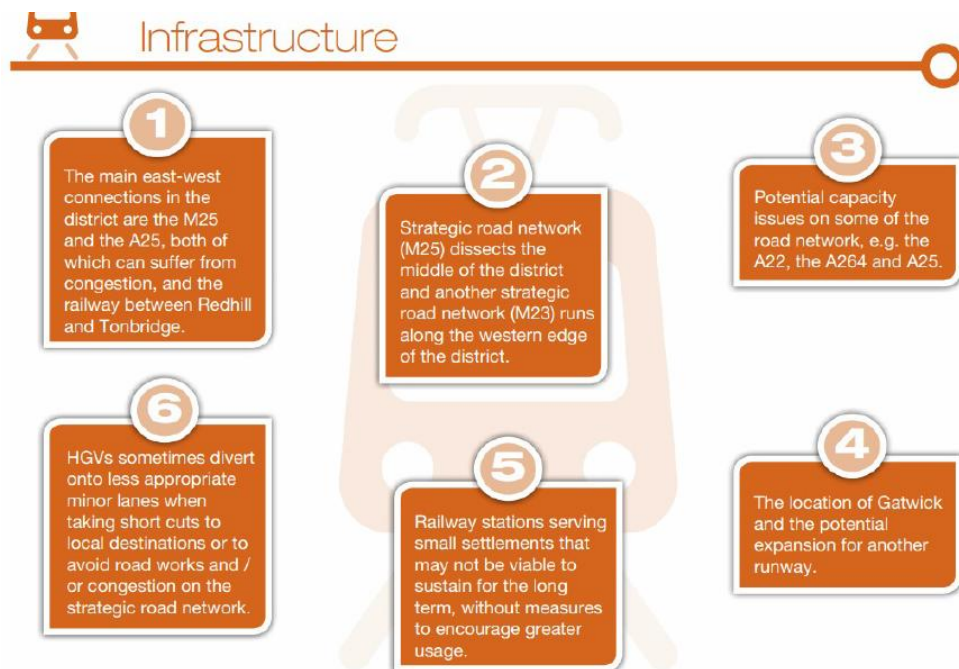
Flooding



Issues 1-7: These are all statements of fact that we assume to be true and so not matters for debate. This list overlaps with the climate change category. The evidence base explains that surface water flooding is the least understood of all flooding types, but it does exist and can have significant negative impacts especially given the undulating topography of Tandridge, yet surface water flooding is not included here. The negative impact from surface water flooding can often be compounded by development.

Conclusion: This is not a list of issues and overlaps with other sections.

Infrastructure



This list does not reflect the two main issues associated with infrastructure in Tandridge that are supported by the evidence base:

- addressing the existing deficit (e.g. shortage of school places, overcrowded GPs, train overcrowding) that resulted from a near double rate of housing completions which was not accompanied by new infrastructure, and
- ensuring that any required infrastructure is in place ahead of new development.

Issue 1: The rail service also suffers from congestion due to over-crowded train carriages, platforms and car parking as explained in Issue 5. We understand from our analysis of Network Rail route utilisation and capacity studies that there is a bottleneck at East Croydon which prevents further increases in rail capacity to this area and that to address the bottleneck a new tunnel bypassing East Croydon would have to be constructed. This fundamental constraint is in contrast to other areas around London and the SouthEast which are experiencing as much as doubling of their rail capacity, e.g. from CrossRail and Javelin.

Issues 2, 3 and 4: These are descriptive or use the word “potential”, and so are not issues.

Issue 5: There is no support to the assertion that rural stations are under threat, and considerable evidence to the contrary:

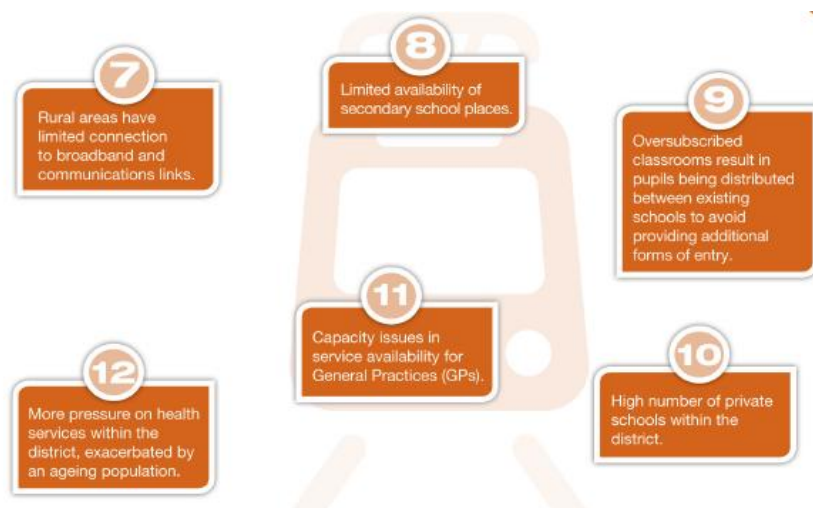
First, to address existing overcrowding, Network Rail is implementing a program of platform lengthening that will see more carriages arriving at stations throughout the District.³⁰ In addition, the infrastructure studies note that “a number of improvements to the rail network have been identified” and that “on road parking around stations which can be a major cause of local congestion on local roads.”³¹

Despite the increase in the number of train carriages to 12 at peak times, anecdotally, the trains to and from East Croydon (and on into London) are still standing room at peak times.

Second, the Thameslink Southern Great Northern combined 20 year franchise agreement also shows no changes to existing services.³²

All of the above contradicts the assertion that rural stations in Tandridge are under-utilised and so are somehow under threat.

Issue 6: We could find no mention of this issue in the evidence base.



Issue 7: This is a statement of fact which is not specific to Tandridge.

Issues 8 and 9: The evidence base also shows limited availability of primary school places and is an example of the existing infrastructure deficit described previously.

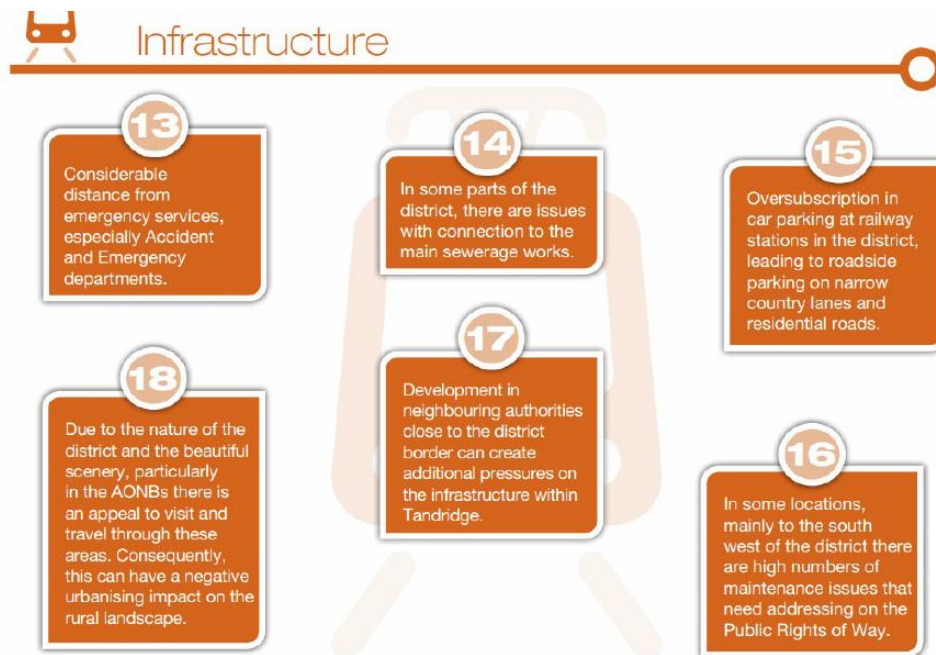
³⁰ Network Rail Route Specifications 2015, SouthEast, April 2015, and the NetworkRail Rail Utilisation Study for the SouthEast.

³¹ Infrastructure Delivery Plan Baseline Part 1: Paragraph 5.6

³² Transport for London (TfL) and the Department for Transport announced in January 2016 the proposed take-over of “suburban” railway lines by TfL which the press releases states would see the train operating company franchise in Tandridge taken over by 2021. More details as to the impact on local services are not available. However, the proposed take-over does not change either the physical or funding constraints that limit the ability to increase rail services to the district. The current TSGN franchise specification can be found on www.gov.uk.

Issue 10: This is neither an issue nor a statement of fact and it is not clear why it qualifies as an important matter for debate as part of developing the Local Plan. These schools are also local employers as well as serving residents of other districts.

Issue 11: Both statistics of GPs per head of population and a large number of anecdotes indicate support for this being an important problem for debate. However, the Infrastructure Studies conclude that there are no requirements at present.



Issue 13: This is a statement of fact.

Issue 14: This should read “there are no connections to main sewerage networks in some part of the district”. This fact is also not mentioned in the Infrastructure Studies.

Issue 15: This is another indication of the prevalence of car travel in Tandridge.

Issue 16: There is no support in the evidence base.

Issue 17: While logically this may be an issue, it has not been recognised in any part of the evidence base despite the extensive duty-to-cooperate discussions and the advanced stage of the Local Plans for a number of nearby authorities.

Issue 18: Is an example of an issue which should have been listed under “Natural Environment” but was not. It is not clear what relevance this issue has to “Infrastructure.” If it being suggested that there is a need for additional “infrastructure” to facilitate visits to and travel through the district, this can only exacerbate the “negative urbanising impact” described.

Conclusion: In addition to the above, this section should include the fact that there is an existing infrastructure deficit due to Tandridge implementing near-double the housing requirement in the Core Strategy 2008. For example, all of the Surrey County Council infrastructure planning assumes a delivery rate of 125 dpa, while Tandridge has delivered nearly double that. This has created an infrastructure deficit in all categories that should be addressed before new development is considered.

Conclusion

Our analysis shows that the proposed list of 73 issues does not:

- include important matters for debate that can be addressed by the Local Plan
- reflect the distinctive characteristics of Tandridge (without this, the Local Plan cannot be appropriate for Tandridge)
- incorporate evidence from the evidence-base (as required by the NPPF)
- reflect the needs and priorities of local residents (NPPF paragraph 1)
- highlight Tandridge-specific attributes that may affect how the sustainability objectives of the NPPF can be achieved

The result of this analysis is that a different picture emerges of both the District and the issues facing the District than that included in the proposed list. This fundamental disconnect must be corrected otherwise the Local Plan will not reflect the characteristics of Tandridge nor will it fulfill the objectives of the NPPF.

Appendix 2: Critique of the Strategic Housing Market Assessment: Tandridge's Objectively Assessed Needs Technical Paper

This Appendix is based on the evidence presented by the Rule 6(6) parties at the Whyteleafe Road, Caterham Public Inquiry (APP/M3645/A/13/2209654 and APP/M3645/A/13/2209687) where the question of objectively assessed needs for Tandridge was extensively debated. Further analysis and contributions have been provided by Robin Miller of Understanding Data.

At this Inquiry, the appellant's case included a leading demographic consultant's report based on the standard ONS SNPP projection results for Tandridge. The Public Inquiry documents show that under cross-examination, the appellant's expert witness agreed with a number of the flaws identified by both the Tandridge barrister and the Rule 6(6) party's QC. These flaws included:

- no consideration of whether the projection results were realistic for Tandridge
- no definition of housing market area
- agreement that housebuilding rates and inward migration were linked in Tandridge
- agreement that the migration data itself could not distinguish the underlying reasons for moving and
- no interrogation of the projections to identify either local or past one-off circumstances and whether these would continue into the future

The Rule 6(6) evidence also included rebuttal of the market signals and economic scenarios put forward by the appellant's expert witness. Although the appeal scheme was allowed, the Core Strategy was not declared out of date.

Robin Miller has 25 years of public sector demographic research, analysis and strategy experience and application. In 2015, he established Understanding Data Ltd. to combine these areas of expertise. Robin is a specialist in demographic and economic issues and trends. He has worked widely across various incarnations of strategic and local planning, and in the practical analysis and interpretation of information. He has represented a range of public and private clients in various aspects of the Local Plan process and has attended and presented evidence at LP examinations, working closely with and representing Edge Analytics Ltd, most recently at Bradford, Warwick, Cornwall, East Devon and Basingstoke and Deane.

Summary

1. The methodology and calculations shown in the Tandridge Objectively Assessed Needs Paper (OAN Paper) are inconsistent with the rest of the evidence base. Consequently, the scenarios project inflated population and household growth increases that do not represent what could reasonably be expected to occur which is what is required by the NPPG. This means that the scenarios do not fulfill the requirements of the NPPF or the NPPG.
2. The Objectively Assessed Housing Needs of Tandridge (OAN Paper) paper uses the population change in the standard 2012 SNPP projections as its starting point, so this analysis is structured as follows:
 - a comparison of the standard projection results with the characteristics of Tandridge as described in the evidence base
 - interrogation of the evidence base to determine the circumstances for the past migration levels and whether these will continue into the future
 - comparison of the OAN Paper methodology and results with the requirements of the NPPF and NPPG

Discussion of 2012 SNPP Projection Results for Tandridge

3. The NPPG [2a:003] requires only those scenarios that could reasonably be expected to occur to be considered, as follows:

*Assessing development needs should be **proportionate** and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that **could be reasonably expected to occur**.*
4. This also implies that the projection results should be supported by and be consistent with the rest of the evidence base. This view is supported by the second edition of the PAS OAN Technical Note referenced in footnote 27 the OAN Paper which states:

5.36 But to understand the projections and take an informed view of the future we need to understand the present and the past.
5. Figure 1 shows that the standard 2012 SNPP projections project the population in Tandridge to grow by 17.7% from 2013 to 2033, which is the period used in the OAN Paper. This projected growth rate is faster than the population growth rate in either

Surrey or the SouthEast. This high rate does not fit the characteristics of Tandridge explained in the evidence base.

		2013	2033	Total chg	%chg	
Tandridge	All ages	84.3	99.2	14.9	17.7%	
Surrey	All ages	1,152.0	1,336.3	184.3	16.0%	
South East	All ages	8,784.8	10,092.8	1,308.0	14.9%	
Source	2012-based Subnational Population Projections					
	Table 2: Local authorities and higher administrative areas within England					

Figure 1: Comparison of 2012 SNPP projection results

6. The components of the projected population increase taken from the 2012 SNPP show that 89% of the projected total population increase is comprised of inward migration. The dominance of inward migration in the results is confirmed in the OAN Paper in Chart 3 and the following:

14...The flows to and from the rest of the UK are substantially larger than the other flows

17....As already noted, the flows to and from the rest of the UK are by some way the largest of the six components of change

7. The standard projections mechanically project recent trends into the future. The year by year projected figures for net migration in the 2012 SNPP are shown in Figure 2. This shows that net migration is projected to be in the range of 600-800 for 19 of the 20 years of the projection period.

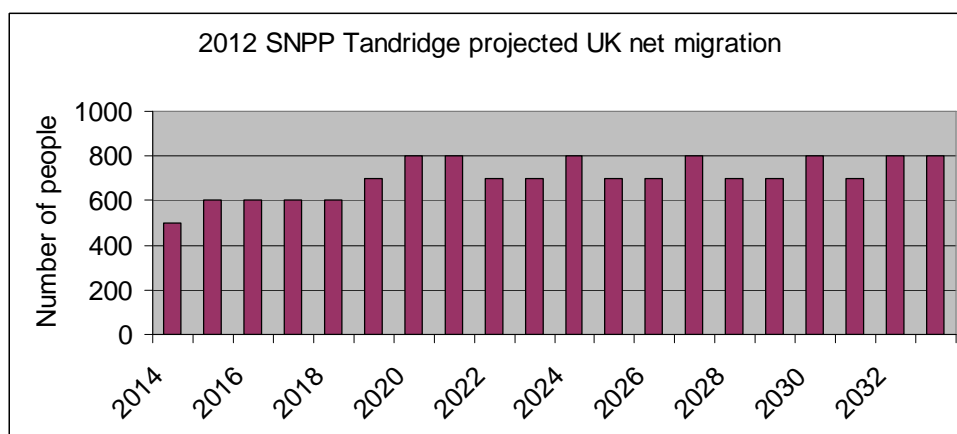


Figure 2: Net migration figures for Tandridge in the 2012 SNPP

8. Chart A1 from the OAN Paper shows the historic net migration from 1991-2014. Both of these show that historic migration levels have been volatile, including periods

of outmigration. Levels of 600 or higher occurred just twice in the period 2004-2014, while the projections show levels of 600 or higher for 19 out of 20 years.

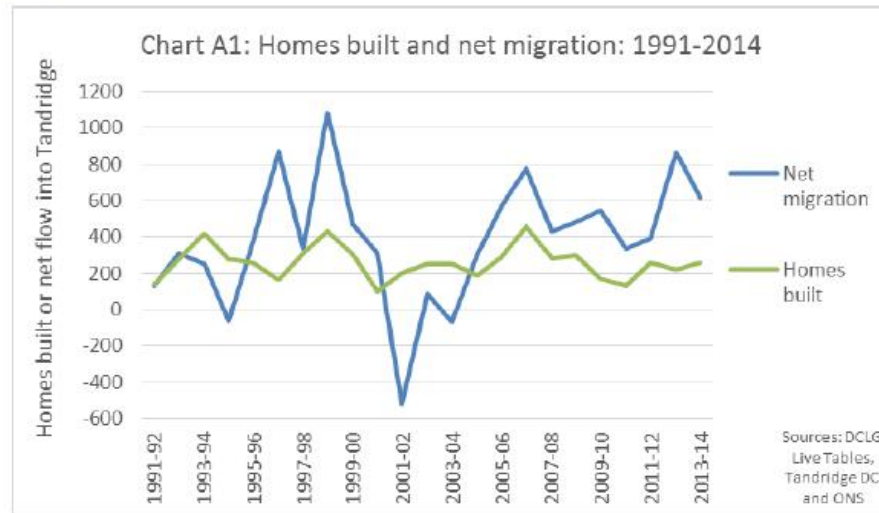


Figure 3: Chart A1 from the OAN Paper

9. Appendix A of The OAN Paper confirms that there is a relationship between the number of homes built and net migration which is supported by Chart A1.
some relationship between the number of homes built and net migration
10. In other words, there is a circular relationship between houses and inward migration into Tandridge. This is not surprising given that Tandridge is located in the SouthEast.
11. Figure 2 shows that the projected inward migration levels represent future levels which are much higher than in the past shown in Figure 3, and so the next stage is to examine the rest of the evidence base to better understand what led to the past housing completion rates and whether these circumstances will persist into the future.
12. The period covered by Chart A1 is the same period referred to in Page 8 of the Functional Economic Area Topic Paper 2015 which explains that Tandridge has lost many major employers since the mid-1990s.
Tandridge has lost many core businesses and major employers since the mid-1990's.

This was part of a wave of corporate and public sector re-structuring and so not specific to Tandridge.

13. Paragraph 2.6.1 of the Tandridge Economic Development and Business Study June 2014 goes on to explain that, in many cases, the now redundant employment sites of these large employers were converted into housing [ed: emphasis added]

*As part of the background research a previous economic development strategy position statement produced in the mid-1990's was located. Within the appendices a table of major employers was published listing over 30 major employers based within the District. Regrettably the majority of these are no longer based within the District **and in many cases the sites they occupied have been redeveloped for residential use.***

14. Examples of employers that left Tandridge are also included in Paragraph 29 of the OAN Paper, as follows:

- *Bristow Helicopters at Redhill Aerodrome downsized (reduced as the North Sea oil and gas activity began to decline) – they had a few international employees*
- *International Rectifier – an international German-based company with its UK HQ at Hurst Green which shrank at the time [ed: the entire industrial Hurst Green industrial estate was eventually vacated and converted into housing]*
- *Commercial Union – based at Whyteleafe was absorbed into a multi-national firm around about this time.*
- *Nestle – UK HQ in Croydon but many employees lived in Tandridge. There was a retrenchment of business back to Switzerland about this time.*
- *US defence operations – a few American service personnel lived in the District but went home after the 'peace dividend' and closure of their communication installations (e.g. at Botley Hill)*
- *MoD people – although Caterham Barracks had already closed, there were still military staff (including some international people) in the District (e.g. in the now redeveloped married quarters at Kenley Aerodrome).*

15. Although the OAN Paper highlights international employees, the loss of these employers would also have affected a large number of UK-based employees.

16. Further evidence to support the circularity of housebuilding and inward migration can be found by analysing the 2001 and 2011 Census population and dwelling change at ward level which is shown in Figure 4. This table shows sizeable increases in population in the wards where many of these large employment sites were located

which far exceeds what would be expected from natural change. The explanation provided in the OAN Paper for the past rates of inward migration is not compelling.

	2001-2011 Population Change	%	2001-2011 Dwellings change	%
Harestone	300	7.8	138	8.6
Portley	408	9.7	148	9.1
Warlingham East and Chelsham and Farleigh	587	11.7	308	14.8
Valley	467	12.5	257	15.3
Whyteleafe	585	17.6	302	19.6
Westway	736	20.4	321	22.0

Source: 2001 Census KS001, UV055, 2011 Census, QS418EW, QS101EW

Figure 4: Population change by ward

17. There are now very few large employers left as shown in Page 8 of the Functional Economic Area Topic Paper 2015:

The current top-50 sites by rateable value reveals very few commercial businesses outside core retail, leisure and non-commercial.

18. Paragraph 2.6.5 of the Tandridge Economic Development and Business Study June 2014 provides further detail which shows that of the five premises with rateable value in excess of £1m, two are M25 motorway services (one each way) and two are supermarkets.

There are only five premises within Tandridge that have rateable values in excess of £1m: 1 x Sainsburys, 2 x Morrisons, 2 x M25 services (one each way) and Lingfield Park [ed: racecourse].

19. The above shows that the circumstances that led to the past high rates of housebuilding are not going to recur because the supply of these large redundant employment sites is now exhausted. This conclusion is consistent with Proof of Evidence given in 2014 by the Tandridge Head of Planning Policy at the Whyteleafe Road, Caterham, Public Inquiry¹ which states [ed: emphasis added]

¹ APP/M3645/A/13/2209654, APP/M3645/A/13/2209687: Land at 186 & Rear of 178-184 Whyteleafe Road and 182-186 & Rear of 178-180 Whyteleafe Road, Caterham, Surrey. This extract is included because the issues arising with the standard projections for Tandridge were debated extensively during this Public Inquiry as explained in the introduction to this Appendix.

*2.43 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**)*

20. The Inspector for the Reigate and Banstead Core Strategy Examination (January 2014) was also faced with similarly unrealistic standard projections due to historic high housebuilding rates, and concluded that their value was limited [ed: emphasis added]:

*21:...they [ed: the 2011-2021 projections] take no account of policy interventions or other individual factors which affect growth rates in particular areas at particular times. This has profound significant for Reigate & Banstead because of its participation in the government's New Growth Points (NGP) initiative. This required the Council to "front load" its delivery of the level of housing proposed in the SEP [ed: South East Plan] and led to a high number of dwelling completions in the years 2006-2010. **Not surprisingly, this led to a significant increase in migration into the borough over the same period....***

*23...Consequently, the latest population and household projections assume that the high growth trend of the previous five years will continue into the future...Clearly the recent projections do not take into account that, under the NGP initiative, growth in Reigate and Banstead was expected to tail off in the latter part of the period. **Their value as reliable indicators of future growth is therefore limited.***

21. The above evidence shows that the past high rates of housebuilding artificially stimulated inward migration and that these inflated levels have been captured by the standard projections and mechanically projected forward into the future. Therefore, the standard projections are not reliable guides to the future.

Summary of economic evidence

22. The economic studies show that there are no economic drivers for inward migration into Tandridge because while the local economic base is stable, future growth prospects are limited. This economic evidence should be reflected in any OAN projections to ensure that the result is realistic and reflects the characteristics of Tandridge and are not just the mechanically generated outputs of a computer model.

23. The economic studies describe Tandridge as a predominantly rural district with a population of 83,000 (2011 Census). Figure 5 includes an extract from Table 4 of the Settlement Hierarchy which shows that even the largest settlements in Tandridge are small when compared to those in nearby areas such as Redhill (population 30,289), Reigate (24,913), Crawley (106,597) and Croydon (town, population 52,104).

Table 4 Approximate population by settlement

Settlement	Population (Highest – Lowest)	Initial
Caterham on the Hill	12,750	
Warlingham	8,650	
Caterham Valley	8,350	
Hurst Green	6,150	
Oxted	5,200	
Burstow	4,500	
Lingfield	3,900	
Smallfield	3,800	
Whyteleafe	3,300	

Figure 5: Extracts from the Settlement Hierarchy

24. The Tandridge Economic Needs Assessment shows that the largest employment sector is now health at 14%, construction at 12% and education at 11%, none of which are considered “growth” sectors.² At 12%, the share of construction in Tandridge is more than double the South East at 4.8% or Surrey at 5.5%³.
25. The high proportion of construction is relevant to any economic driven projections because construction is economically sensitive and so employment levels are more volatile. This means that Tandridge will suffer disproportionately in any downturn and this volatility should be reflected in any economic projections. The other sectors are publicly funded, where continual funding pressures exist and so forecasting high growth rates would not be credible. These sectors are also linked to population growth in many economic forecasting models, and so any projections must take this circularity into account when considering whether the outputs are reliable.⁴

² Tandridge Economic Needs Assessment, Table 3-8.

³ Local area profile via nomis using the ONS Business Register and Employment Survey data 2014.

⁴ Tandridge commissioned a needs study from GL Hearn in 2013 which was received but not approved. That report also includes an Experian employment projection. Paragraph 4.10 of that report states “We do however need to be cautious about circular issues here; in that population projections are one of the inputs

26. While the evidence shows that the existing economic base is relatively stable, the evidence also shows that competition to attract new businesses and employment will only increase in the future because of initiatives currently underway or planned by other nearby local authorities. These will limit future employment growth prospects in Tandridge. The new initiatives are mentioned in a number of the evidence documents⁵ and include:

1. London Borough of Bromley: The consultation draft of the Bromley Local Plan included in the evidence base shows an expansion of Biggin Hill airport to accommodate employment growth in general aviation and aviation-related services.
2. London Borough of Croydon: comprehensive regeneration plan currently underway at East Croydon, Croydon, and Purley Way. This plan includes significant improvements to transport, retail, commercial and residential. For example, the Retail and Leisure Study states:
3.74... In particular major development in Croydon (Westfield/Hammerson) will draw additional trade from Tandridge.
3. London Borough of Sutton: the potential creation of a Life Sciences Cluster which would increase employment in Sutton from 2,500 to 8-9,000
4. Reigate and Banstead: Large strategic employment site identified in Horley for high tech/campus type industry. New large major supermarket and further expansion of town centre offering.
5. Crawley: regeneration of the Manor Royal industrial estate
6. Horsham: Proposed North Horsham business park to be accompanied by new parkway railway station with links into London.
7. Mid-Sussex District Council: New 30 ha business site has been identified as a potential Science and Technology Park.

27. These neighbouring districts have recognised urban centres with a well-established critical mass of customers, suppliers and services from which to grow existing businesses and attract new local employers. These centres also have sufficient size and scale to justify investment in the new infrastructure required to support sustainable economic growth

to the economic model and around 45% of the forecast increase is in sectors which are influenced by population (Education, health, accommodation & food, recreation, retail, residential care & social work). The Experian model illustrates the self-defeating prophecy described in the PAS OAN Technical Note and so is not a reliable cross-check.

⁵ Tandridge Retail and Leisure Study, Tandridge Duty to Cooperate Statement Update 2015 Appendix A, Surrey Hotels Futures Study, 2015, Bromley Local Plan Consultation Draft.

28. Given the above, projecting high levels of economic and employment growth in Tandridge is neither realistic nor justified by evidence, and this implies that there are no economic drivers for the high levels of inward migration shown in the standard projections and in the scenarios included in the OAN Paper.

Discussion of the methodology in the OAN Paper

29. The methodology used in the OAN Paper does not fulfill the requirements of the NPPF or the NPPG, the scenarios do not fit the profile of Tandridge, the scenarios are unrealistic and the reality check relies on unreliable figures generated by a circular model.

Housing Market Area

30. The methodology used in the OAN Paper omits the step of defining the HMA and so does not fulfill the requirements of the NPPF or the NPPG. Paragraph 47 of NPPF states [ed: emphasis added]

Meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework

31. Paragraph 2a-008 of the Planning Practice Guidance states [ed: emphasis added]:
Needs should be assessed in relation to the relevant functional area, ie housing market area

32. Page 5 of the OAN Paper describes the approach taken, and does not list the step of defining the Housing Market Area, as shown in the following [ed: emphasis added]:

Approach

This report follows the approach indicated by the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). It takes as its starting point the official population and household projections.

To assess the housing requirement of any area it is necessary to:

- *Estimate the size and age structure of the population that will need to be housed.*
- *Take a view on how that population will be housed.....*

33. This is a fundamental flaw in the approach used in the OAN paper particularly in light of the dominance of inward migration in all of the scenarios shown. Figures 2.8 and 2.9 of the HMA Study shows how widely dispersed the moves to/from Tandridge were in 2000/2001 and Figure 2.4 of the HMA Study shows the dispersal of migration flows to/from even more local authorities in the 2011 Census.
34. The OAN Paper creates a ten-year average of all of these historic flows from all of these local authorities and uses that aggregated total in the needs assessment calculation for Tandridge as shown in Table S1, Table 3 and Table 4. The implication of this approach is that Tandridge is part of the HMA for all of these local authorities.
35. However, Tandridge is neither working jointly with nor does Tandridge appear in the HMA evidence for any other local authorities as explained in HMA Study Chapter 5, and so the needs from these other local authorities should not be included in the Tandridge needs assessment. This is explained in the PAS OAN Technical Note:
- 2.2 .. local planning authorities should make objective assessments of the need for market and affordable housing, working jointly with neighbouring authorities who share the same housing market area.*
36. The evidence that Tandridge is not part of the HMA evidence for any other local authority is considerable and includes HMA evidence which has been Examined and incorporated into adopted Plans and so should be given substantial weight.
37. With regards to London and the London Boroughs, Chapter 5 of the HMA Study shows that Tandridge is not part of the HMA evidence for any of the London Boroughs. This is not surprising as Paragraph 3.15 of the London Plan states that London is itself regarded as a single housing market.
38. More specifically, the SHMA update currently underway in neighbouring London Borough of Croydon is being prepared on a standalone basis. This is consistent with previous SHMA evidence prepared for part 1 of the Croydon Local Plan which was

Examined and the Plan adopted in April 2013. Paragraph 5.8 of the HMA Study states [ed: emphasis added]

GL Hearn is currently preparing a new SHMA for Croydon...The SHMA is focussing on the borough of Croydon in isolation.

39. The draft GL Hearn SHMA for Croydon has since been published and concludes that the SHMA should be prepared for Croydon alone:

4.43we consider that the preparation of a SHMA for Croydon alone would be appropriate.

40. The Reigate and Banstead Core Strategy was Examined under the NPPF and adopted in January 2014. The HMA evidence submitted at that Examination did not include Tandridge.

41. The Crawley Local Plan passed Examination in December 2015 and relied on the Northern West Sussex HMA evidence which does not include Tandridge. Mid-Sussex District Council is also relying on the same Northern West Sussex HMA evidence in their revised Plan. Examples of where Paragraph 2.2 of the PAS OAN Technical Note was put into practice include both the Reigate and Banstead and Mid-Sussex Local Plans being adjusted to include unmet need from Crawley because the Northern West Sussex HMA evidence showed that they were in the same HMA. The Sevenoaks SHMA, dated September 2015, also does not include Tandridge.

42. Appendix A of the Tandridge Duty to Cooperate Statement Update 2015 includes minutes from Duty to Cooperate meetings with other local authorities all of which describe housing market links with Tandridge as minimal or very minor as shown in the Figure 6.

London Borough of Bromley	“very minimal”
London Borough of Sutton	“very minor”
Mid Sussex District Council	“allocate it [extra housing capacity] to Crawley and Brighton, who are within their primary and second Housing Market Areas (HMA)”
Sevenoaks	“very minor links”
Wealden	“very minor links”

Figure 6: Extracts from Appendix A of the Duty to Cooperate Update 2015

43. The assertion in the HMA Study paragraph 6.8 that the main obstacle to joint working is timing is not supported by the fact that a number of the SHMAs and Local Plans (e.g. Croydon, Crawley, Mid-Sussex, Sevenoaks) have been or are being produced in parallel with the Tandridge Local Plan Part 1. The Duty to Cooperate Scoping Statement explains that these local authorities were first approached about joint-working in early 2014 and this is also explained in the HMA Study paragraph 5.42

Opportunities to prepare a joint assessment were explored by the Council, through an approach to all neighbouring authorities which did not identify any potential partners

44. So it would seem that sufficient opportunity was provided, but that the evidence showed that links were so minor that joint working was not justified.
45. The absence of Tandridge in any other HMA evidence is consistent with the fact that the migration flows are, in fact, very small when considered in the context of these other local authorities, even when attempts to increase relevance, such as normalising and adding in and out flows together as shown in the HMA Study Figures 2.6 and 2.7, are made.
46. Given the above, the approach taken in the OAN paper which attributes need from a wide range of local authorities to Tandridge even though Tandridge is not in the HMA evidence of those local authorities is not compatible with either the NPPF or the NPPG. As the vast majority of the OAN figure shown in the OAN paper is comprised of inward migration which should not be included in the needs assessment, the OAN figure is significantly inflated.

Cross-boundary unmet need

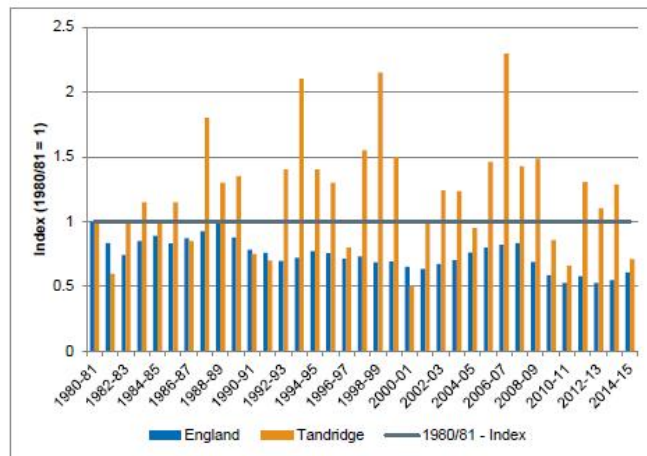
47. The PAS OAN Technical Note goes on to explain that “cross-boundary unmet need” should not be included in the OAN, but assessed as part of the process of developing the housing requirement, in other words “below the line” or “policy on”. Paragraph 4.5 explains [ed: emphasis added]:

*Cross-boundary imported need belongs below the line, for two main reasons. One reason for this is that unmet need in neighbouring authorities results from a policy change in neighbouring authorities....**Another reason is that how much of that need the subject authority should accommodate depends partly on its own constraints, including policy constraints.***

48. Paragraph 3.5 of PAS OAN Technical Note also explains that population and household projections are not “policy-off” because they invariably capture and project forward the consequences of past policies and so are “policy-neutral” or “policy-same”. This is relevant because the evidence strongly suggests that the historic high house building rates in Tandridge have inadvertently met unmet need arising elsewhere. However, as paragraph 18 of the OAN Paper explains, the migration data itself relies on GP registrations. This means the underlying data cannot distinguish the reasons for a move, and so other contextual evidence is necessary to understand whether these historic flows comprise unmet need.

49. First, the Strategic Housing Market Assessment: Analysis of Market Signals paper (Analysis of Market Signals paper) includes a chart showing that the index rate of housing development in Tandridge has been considerably higher compared to the average for England for most years since 1980. This is a clear indicator that the historic rate of housebuilding in Tandridge has been unusually high.

Figure 3.13: Indexed Rate of Development 1980 – 2015



Source: DCLG, 2015; Tandridge District Council, 2015

Figure 7: Indexed rate of development

50. Second, the Analysis of Market Signals paper surveys a range of market signals which shows that these signals have worsened more in other districts than in Tandridge. This is another indicator that these other districts have historically under-provided.

51. For example, paragraph 3.4 explains that house prices in Tandridge have not risen as much as neighbouring districts. Paragraph 3.6 explains that the growth rate of average prices was lower than all neighbouring authorities with the exception of Crawley and Paragraph 3.8 explains that

house price growth did fall below the growth seen nationally or in several neighbouring authorities, most notably the London Boroughs of Bromley, Sutton and Croydon.

52. The growth rate in the lower quartile in Tandridge was also below many neighbouring authorities as explained in paragraph 3.10:

This continues to fall below the national average and many neighbouring authorities, with the exception of Sevenoaks and Reigate and Banstead.

53. Figure 8 includes two tables from the Analysis of Market Signals paper which show that Tandridge ranks below almost all nearby authorities for change in overcrowded households and change in concealed families between 2001-2011.

Figure 3.19: Change in Overcrowded Households (Rooms) 2001 – 2011

	2001	2011	Change	% change
Mid Sussex	2,015	3,199	1,184	58.8%
Croydon	15,942	23,796	7,854	49.3%
Crawley	3,064	4,196	1,132	36.9%
England	1,457,512	1,928,596	471,084	32.3%
Bromley	7,996	10,456	2,460	30.8%
Reigate and Banstead	2,822	3,661	839	29.7%
Sevenoaks	1,670	2,160	490	29.3%
Sutton	6,509	8,316	1,807	27.8%
Tandridge	1,486	1,841	355	23.9%
Wealden	2,000	2,396	396	19.8%

Source: Census 2011; Census 2001

Figure 3.21: Change in Concealed Families 2001 – 2011

	2001	2011	Change	% change
Sutton	497	1,047	550	110.7%
Crawley	360	755	395	109.7%
Mid Sussex	256	509	253	98.8%
Croydon	1,490	2,746	1,256	84.3%
England	161,254	275,954	114,700	71.1%
Wealden	326	551	225	69.0%
Bromley	773	1,290	517	66.9%
Sevenoaks	270	420	150	55.6%
Tandridge	202	298	96	47.5%
Reigate and Banstead	348	512	164	47.1%

Source: Census 2011; Census 2001

Figure 8: Overcrowding indicators from the Analysis of Market Signals Paper

54. The analysis also includes comparison of the market signals with other local authorities having similar demographic and economic attributes, and concludes in paragraph 4.5 [ed: emphasis added]:

*When compared to similar demographic and economic areas, Tandridge continues to rank in a relatively average position. **Change in overcrowding and concealed families has, however, been relatively limited compared to the other authorities shown.***

55. The Analysis of Market Signals paper also explains that consistent under-provision in Croydon and Mid-Sussex could have impacted Tandridge:

Paragraph 3.57...is it notable that only Reigate and Banstead has met planned targets, with both Croydon and Mid Sussex failing to meet planned targets. Consistent underprovision in the latter in particular could have historically impacted upon the relationship with Tandridge....

56. Croydon has been a source of inflows and Mid-Sussex is a destination for outflows, and so under-provision in these districts would have increased historic net migration in Tandridge.

57. The final indicator is a comparison of the 2001 and 2011 Census data in Figure 9 which shows that Tandridge average household size has remained almost constant while almost all of the areas from where people migrated into Tandridge⁶ have seen increases.

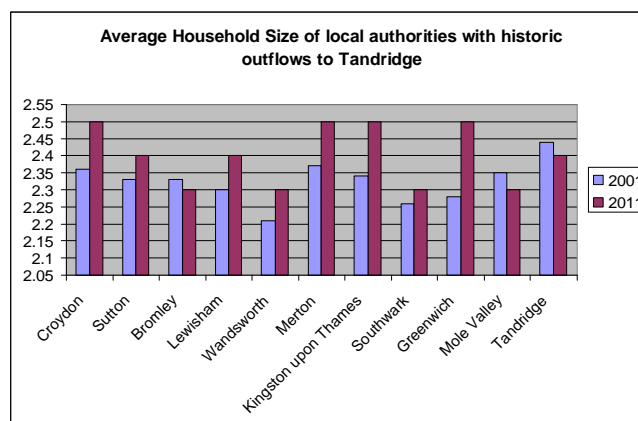


Figure 9: Average household size of local authorities with historic outflows to Tandridge

58. When taken together, the above indicates that the past very high rates of house building in Tandridge inadvertently met unmet need arising outside of Tandridge. This means that all of the inward migration included in the OAN Paper is unmet need

⁶ Figure 2.5 of the Strategic Housing Market Assessment : Defining the Housing Market Area study.

exported from other local authorities and so should not be included in the Tandridge needs assessment as the PAS OAN Technical Note explains.

Discussion of the adjustments made to the standard projections in the OAN Paper

59. This section reviews the adjustments made to the standard projections.

Lack of modelling and overall transparency in presentation

60. The first observation is that the presentation does not include the usual scenarios (e.g. zero net migration) found in this type of report as produced by the large demographic consultants. These scenarios also allow separate (as far as is practicable) understanding of the components, for example the proportion of natural change versus migration. These initial scenarios also provide a helpful starting point from which subsequent analysis, such as interrogation of past trends, migration, housing market area evidence, local circumstances, etc. can be done.

61. While we recognise that it may be acceptable to change an element of the assumptions around a published projection, to do that through a model leaves a data trail that is open to investigation. However, the OAN Paper adjustments just show the end result with no clear trail of how the adjustments have been made. This is an important failing in how the entire document is presented.

62. A good example of the weakness of the OAN Paper's approach that leads to questioning of the results is found in chart 22 (page 39) which shows "Population aged 16 to state pension age: Tandridge" and the text that follows this chart.

- Chart 22 is not sourced and the underlying data is not included, tabulated or appended to allow the reader to make the necessary connections between the source data and what appear to be significant adjustments in the analysis. The impact of the adjustments in the OAN Paper to the SNPP is not clear, referenced or illustrated.

- The reference to state pension age is not clearly set out and so it is not clear what the upper level of the age group is, for example is it 64? is it rising and if so how does it change and for what years? is it the same for males and females?
- By way of comparison to the assertion in the OAN Paper of an increase of 8,490 from 2013-2033, the SNPP figures for these years for ages 16-64 are 3,016. This is a significant and material difference from the standard projections that warrants explanation, but which is not set out clearly or in detail in the OAN Paper, as highlighted above.

63. The age structure of the population is also a very important part of the understanding that should lie behind any needs assessment, but the OAN Paper makes very little reference to this. The adjustments made to the projections in the OAN Paper raise the population projections as a total, but the workings and details of these adjustments are not clear.

64. However, and more importantly, the OAN Paper does not specify the age structure impact of the additional population, which in turn would have an impact on household formation as set out in note 22 on page 33. This seems to imply that the adjustment of population has been (as found in Table 9 of the OAN Paper) calculated simply as a whole population calculation using the 2012 SNHP household formation rates on this larger population figure. If this is the case, the calculation is neither robust nor transparent, and the result is unreliable.

65. While the models themselves may or may not be intellectual property, the workings and outputs are an essential part of the evidence base for the Local Plan and so are in the public interest. This is why the model outputs are routinely made available by the other large demographic consultants that produce this type of reports. The absence of this information in the OAN Paper is therefore notable as the above examples illustrate.

66. The unusual circumstances of Tandridge require careful consideration and so the greater the transparency, the easier it is to see how these local circumstances have been taken into account.
67. The consequence of the above is that both the approach and the OAN calculations lack the transparency required to allow consultees and Examiners to understand both the principles and the calculations used.

Adjustments to the standard projections

68. The OAN Paper replaces the standard 2012 SNPP migration flows with a ten-year average. The results project population in Tandridge to increase faster than either Surrey or the SouthEast, which does not match the characteristics of Tandridge explained previously.
69. The ten-year period used, 2004-2014, overlaps with the period when, as explained earlier, high rates of housebuilding were made possible due to the re-development into housing of a number of large redundant employment sites.
70. The OAN Paper confirms that there is a relationship between housebuilding and inward migration. As explained above, the circumstances that led to these historic high rates of housebuilding are not going to recur. Therefore, the ten-year period used is not a reliable guide as to what can reasonably be expected to occur in the future, and so the scenario is unrealistic and so contrary to the NPPG.
71. The ten-year average includes historic flows from all local authorities, none of which have included Tandridge in their HMA evidence, and so the needs assessment is contrary to requirements in the NPPF and NPPG. The contextual evidence indicates that these flows are unmet need arising in these local authorities, and so should not be included in the Tandridge needs assessment.

International flows

72. The OAN Paper includes an upwards adjustment to international flows that allocates a portion of a wider projected increase in international migration to Tandridge but does not include robust evidence for why this should be allocated specifically to Tandridge.
73. The economic evidence and the OAN Paper explain that the large historic outflows are linked to the loss of large employers who had international employees. There is no evidence in the OAN Paper or in any of the remaining evidence that supports either these or other similarly large, international employers returning to Tandridge.
74. On that basis, the upward adjustment to international flows is not supported by robust evidence as required by the NPPG.

London

75. The OAN Paper assertion that London has not been taken into account is not supported by evidence. Paragraph 39 of the OAN Paper states
- The analysis hitherto has not explicitly recognised that Tandridge has a very large neighbour immediately to its north: London.*
76. However, both the 2001 and 2011 Census figures for migration flows and the figures in the HMA Study show that London Boroughs are included in the figures. Any download of the historic migration data used to generate charts or to calculate the ten-year migration average would also include the London Boroughs. Therefore, this statement is not supported.
77. The alternative GLA and pre-recession scenarios make minor adjustments to the dominant migration flows factor. Making inappropriate minor adjustments to a flawed large number does not produce additional insights into the needs arising in Tandridge.

78. The OAN paper also appears to apportion GLA flows to Tandridge which is contrary to the approach taken by the GLA models. The GLA models recognise that any outflows from London are not attributable to individual local authorities outside of London. Instead, outflows are assigned to Regions, e.g. East of England, South East of England, the rest of the UK, as shown in the following⁷:

Migration overview

The model is based around 37 possible origins and destinations for migrants (see Figure 3). There are:

- 1) the 33 London local authorities*
- 2) the East of England*
- 3) the South East of England*
- 4) the rest of the UK*
- 5) overseas*

Figure 3: Showing geography of migration units in the GLA population model

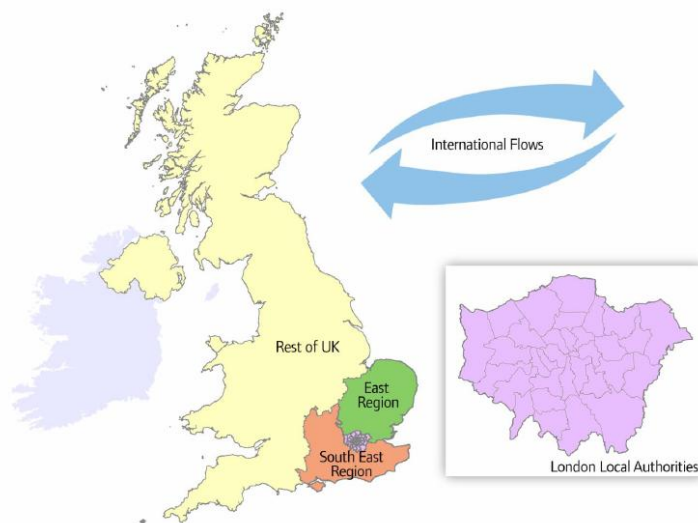


Figure 10: The GLA models outflows to regions and not individual local authorities outside of London

79. It therefore seems that flows from London shown in the GLA model have been incorrectly attributed to Tandridge.

80. The consequence of all of the above is that these alternative scenarios are also not robust.

⁷ GLA Intelligence: 2014 round of trend-based population projections – Methodology, June 2015

Household formation rates, market signals and affordable housing

81. There is no robust evidence to support adjustments.

Employment projections

82. The OAN Paper relies on Experian projections to verify the plausibility of the OAN Scenario. This is flawed because, as explained early, nearly half of the employment sectors in Tandridge are linked to population growth, and so the results are circular.

83. In addition, both the input and output of the Experian model is population. This circularity is in addition to the circular relationship identified earlier between housing completions and inward migration.

84. Paragraphs 8.4-8.11 of the PAS OAN Technical Note referenced in the OAN Paper expands on this circularity by explaining that many economic projections include a view of future population. What this means is that population is both an input and an output to the model and so the model cannot produce a valid result because its logic is circular, and so faulty. The PAS OAN Technical note describes this circularity as a “self-defeating prophecy.”

85. In addition, the projected increase of 9,260 represents a significant turnaround in local employment prospects given the economic evidence base which indicates a stable local economy but with limited growth prospects.

86. Although it is not clear from the OAN Paper, it may in fact be the case that the Experian projections relate to residents in employment and not jobs in Tandridge. The economic studies and the HMA Study show that only 39.1% of those who work in Tandridge live in Tandridge, so there is a sizeable difference between jobs in Tandridge and residents in employment and this attribute should be reflected in any employment projections or economic analysis.

87. As the Experian model used for the “reality check” is not reliable, the results cannot be used as a credible reality check for the OAN Paper, and so the conclusion that the OAN scenario is plausible is not supported.

Conclusion

88. The OAN Paper does not fulfill the requirements of the NPPF and the NPPG. The scenarios make minor adjustments to the 2012 SNPP projections while not recognising that the 2012 SNPP migration levels on which these scenarios are based are inflated and so generate unrealistic scenarios when compared to the characteristics of Tandridge described elsewhere in the evidence base.
89. The OAN Paper states that inward migration into Tandridge is linked to house building. Past high rates of house building in Tandridge have only been made possible through one-off circumstances where almost all large employers left the district and the redundant employment sites were re-developed for housing. The ten-year average used in the OAN paper scenarios assumes that the circumstances of the past ten years will persist for 20 years into the future, but the remainder of the evidence shows that the supply of these sites has been exhausted.
90. The ten-year period used is not representative because it includes artificially high inflows due to high house building rates. There is no genuine economic reason for high levels of inward migration because the evidence base shows a stable local economy, but with limited growth prospects.
91. The inclusion of all migration flows in the OAN paper is flawed because historic flows are widely dispersed among many local authorities and so the needs figure will inevitably include need from local authorities that do not include Tandridge in their HMA evidence because no local authorities include Tandridge in their HMA evidence.

92. The evidence base shows that Tandridge has inadvertently accommodated unmet need from other districts and this has been captured and projected forward in the projections. According to the PAS OAN Technical note, unmet need arising in other areas should not be included in the objectively assessed need assessment.
93. The OAN Paper relies on Experian projections to check validity, but these projections are circular because nearly half of the projected employment is driven by population growth. The cross check figures are therefore unreliable and so the conclusion that the projections are plausible is not robust.
94. Simple cross-checking with the age bands in the standard SNPP projections for Tandridge show significant discrepancies between the standard projections and the OAN Paper. However, the adjustments and the results made in the OAN Paper cannot be reconciled because the workings and the model outputs are not included.
95. Given the above, neither the OAN Paper methodology or the scenarios fulfill the requirements of the NPPF and the NPPG and so the OAN Paper does not provide a robust basis on which to develop a sound Local Plan.

Appendix 3: Detailed analysis of the Green Belt Assessments

This detailed analysis of the Green Belt Parcel Assessments is submitted on behalf of the Oxted & Limpsfield Residents Group. It has not been possible to critique all of the parcel assessments, and so we have selected the following (GBA003, GBA005, GBA006, GBA007, GBA012, GBA017, GBA018, GBA019, GBA020, GBA022, GBA023, GBA024) as a case study set of parcels that illustrate common flaws arising in the assessment work. We believe that these same flaws arise in many of the other parcel assessments.

The consequence of the flawed assessments is that the contribution of each parcel to the Green Belt is weakened and this could lead to inappropriate conclusions regarding whether the land should be retained in the Green Belt.

Strategic Green Belt Areas

Methodology

The Green Belt Assessment does not justify the need to subdivide the Green Belt in this small district into 'Strategic Green Belt Areas'. The Assessment states that the 'Strategic Green Belt Areas' have been determined through

assessing similar characteristics that can be found in across a broad brush area, including similar characteristics across the district boundaries.

The character of an area is not relevant to assessing the Green Belt and should not be used to produce a sound evidence base.

The boundaries of the 'Strategic Green Belt Areas' do not appear to follow the boundaries of the other artificially generated 'parcels' used elsewhere in the Assessment. This confirms the inappropriateness of either the 'Strategic Green Belt Areas' or the 'parcels' – or both - as logical or meaningful subdivisions by which to assess Green Belt purposes.

In common with the subdivision of the District into parcels, the creation of separate 'Strategic Green Belt Areas' has created artificially subdivided swathes of Green Belt land. This divides sections of Green Belt performing a single purpose; does not facilitate an assessment of the role of the wider Green Belt within the District and consequently tends to diminish the purposes which the Green Belt fulfils in any particular location.

Whilst the subdivision of the District into separate 'strategic areas' is not accepted, the opportunity has been taken to comment on 'Strategic Area B' as the content would no doubt remain as part of the assessment even if the Green Belt within Tandridge District is assessed as one area.

Strategic Area B

The Assessment contains the following questions and comments regarding 'Strategic Area B'.

Purpose 1: to check the unrestricted sprawl of large built-up areas

- *Does the Green Belt in the area restrict sprawl from London?*
- *Does the Green Belt restrict sprawl from other large built up areas, particularly large built up areas adjacent to the district boundaries?*

Assessment Commentary: Moderate contribution to checking sprawl as it contains some larger towns but limited by its distance from the substantial built up areas of London.

Development generally contained within settlements and towns

The NPPF does not advise that the fulfilment of a green belt purpose should be graded. Rather the assessment must be whether an area fulfils the Green Belt purpose or not. Similarly, there is no justification for sub-dividing this purpose by reference to the different large built up areas around: if an area prevents a large built up area from sprawling, it fulfils this purpose whether the large built up area is London, Oxted or anywhere else. In any event, in a pressured area such as the London Green Belt, and with London Boroughs as a neighbour, it is self-evident that the Green Belt in Tandridge District restricts sprawl from London.

Purpose 2: to prevent neighbouring towns merging into one another;

- *What towns are within the Strategic Area?*
- *Does the Green Belt prevent these towns within the strategic area merging, giving consideration to the physical on the ground connection and perception of coalescence?*

Assessment Commentary: Some contribution to separating specific towns such as Godstone and Bletchingley but most settlements within this strategic area are generally well spaced apart and the threat of coalescence is not great.

The Assessment considers that the gap between separate towns is too great for the Green Belt to be preventing a merging of the two settlements. The distance between settlements is not considered a sufficient test as, over time, sufficient development would result in the merging of two settlements and any Green Belt between neighbouring towns therefore must be assisting in preventing them from merging. The Assessment should include the role the Green Belt plays in preventing the merging of:

- Woldingham and Warlingham
- Woldingham and Oxted
- Woldingham and Caterham
- Oxted and Old Oxted

- Oxted (Limpsfield) and Limpsfield Chart
- Oxted (Limpsfield) and Westerham
- Oxted and Edenbridge

In addition, the importance of the Green Belt in separating the distinctive built up areas of Oxted and Hurst Green and Oxted and Limpsfield should be mentioned.

Purpose 3: to assist in safeguarding the countryside from encroachment

- *What are the characteristics and features of the area?*
- *Does the area contain countryside?*
- *Does the area assist the area from encroachment?*

Assessment Commentary: Mostly open countryside and considered to generally be effective at safeguarding it from encroachment except where development already exists

The existence of development within the Green Belt does not prevent the area from fulfilling this purpose. First, the development may have been present at the time the Green Belt was designated with little having changed in the intervening decades. Second, the development may be appropriate development within the Green Belt and therefore be legitimately part of the area. Where this is the case, the Assessment should confirm unequivocally that the Tandridge Green Belt fulfils this purpose.

Purpose 4: to preserve the setting and special character of historic towns

What Conservation Areas are in the Strategic Area?

Are the Conservation Areas in the centre of the settlements or outside?

Does the Green Belt maintain the setting and special character area of the Conservation Areas?

Assessment Commentary: Strong role in preserving the Conservation Areas as they are generally set in open countryside free from surrounding development

The assessment applies the test of the visual relationship between a designated conservation area and the Green Belt. The Green Belt purpose, however, is not reliant on the proximity of a designated Conservation Area. Indeed, the Green Belt can preserve the setting of an historic town without abutting a designated Conservation Area.

The assessment also misinterprets the Historic England definition of setting and focuses on only views out from the Conservation Area. Historic England state that although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors and does not depend on there being public access or views to experience that setting.

Nevertheless, the Assessment correctly identifies the strong role of the Green Belt in preserving the setting and special character of Conservation Areas.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

This purpose was not applicable, for the same reasons it was not applicable to the parcel assessments.

All Green Belt land in the district has the potential to serve this purpose. The HELAA identifies sites outside the Green Belt which, if suitable for development, would be encouraged by strong Green Belt controls. For example, the Green Belt is playing an important role bringing forward the development of the Oxted gasholder brownfield site in the urban area. Similarly, the Local Plan anticipates 540 dwellings to come forward on windfall sites (excluding back gardens) in a 20 year period and Green Belt policy will assist in ensuring that these come forward and are located within the more sustainable built up areas excluded from the Green Belt. This approach fulfils one of the NPPF core principles to encourage the effective use of land by reusing land that has been previously developed (brownfield land). As Green Belt land in Tandridge District clearly fulfils this purpose, this should be acknowledged in the Assessment.

Green Belt Parcels

The critique of the Green Belt Assessment Methodology is that the assessment has created small artificial parcels of Green Belt land for analytical convenience. This divides sections of Green Belt performing a single purpose and does not facilitate an assessment of the role of the wider Green Belt around a settlement and consequently tends to diminish the purposes which the Green Belt fulfils in a location.

For this reason, this response groups the small parcels used in the Assessment into more logical areas which are jointly performing a number of Green Belt purposes. In addition, the response assesses the strategic role the Green Belt plays around the settlements of Oxted and Woldingham.

It has also been noted by residents that some of the factual information in the Assessment is inaccurate or incomplete. This is not the place to list each and every case but comments in each parcel highlight some of the issues.

Gap Between Woldingham and Warlingham

Openness

The parcel GBA3 assessment concludes correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas;

The Assessment gives the intervening topography between Warlingham and Woldingham as a reason for checking unrestricted sprawl in addition to the Green Belt designation. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in checking unrestricted sprawl but whether the Green Belt performs this role.

The Assessment states that Area 3 only has a moderate function at serving this purpose because of the presence of the intervening topography. The existence of a steep valley

should not be cited as a reason for only a 'moderate' performance. The fact that the Green Belt fulfils this function should be recorded without qualification for Area 3, consistent with other areas. Reference to intervening topography should be omitted from the analysis.

To assist in safeguarding the countryside from encroachment

The Assessment considers that low density large dwellings result in the parcel playing only a moderate role in assisting with safeguarding the countryside from encroachment. The existence of development which pre-dates Green Belt designation should not be cited as a reason for only a 'moderate' performance. The fact that it fulfils this function should be recorded without qualification for Area 3, consistent with other areas.

To prevent neighbouring towns merging into one another

The intervening topography and woodland between Warlingham and Woldingham is seen as a reason for preventing neighbouring towns merging into one another. As a consequence, the Assessment mistakenly assesses this parcel as playing only a 'minor' role in serving this purpose.

This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing neighbouring towns merging into one another but whether the Green Belt performs this role. The existence of a steep valley should not result in it being cited as a reason for only a 'minor' performance. The fact that it fulfils this function should be recorded without qualification for Area 3, consistent with other areas. Reference to intervening topography should be omitted from the analysis.

To preserve the setting and special character of historic towns

This Green Belt purpose has not been appraised in the Assessment. Nevertheless there is ample evidence available which describes the very special character of Woldingham. The Woldingham Village Design Statement, Woldingham Character Assessment and Design Guidance are all currently adopted Supplementary Planning Documents. The Woldingham Neighbourhood Plan (which has been Examined and is shortly to go to Referendum) carries forward historic Woldingham-specific planning policies to ensure that the distinctive and special character of historic Woldingham is maintained.

The Green Belt that is in and around Woldingham ensures that the setting and special character of Woldingham is preserved.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose focusing development within the built up areas.

Conclusion

The parcel assessment concludes correctly that Area GBA3 exhibits the essential Green Belt characteristic of openness. The Assessment concludes that the area fulfils all three Green Belt purposes assessed.

The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness alongside an appraisal of how the parcel preserves the setting and special character of Woldingham.

The Green Belt around Woldingham (GBA3) is part of the original Metropolitan Green Belt and continues to fulfil the original purpose of the Green Belt which is to contain the sprawl of London.

For these reasons, Area GBA 3 be retained in the Green Belt.

Gap Between Woldingham and Oxted (Areas GBA 5, 6, 7, 12 and 18)

The M25 is situated within the Green Belt (as elsewhere) between Woldingham and Oxted but has no significant impact on the purposes of the Green Belt between the settlements.

Openness

All the parcel assessments conclude correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas;

The Assessment notes that parcel GBA18 includes a “wedge” of Green Belt land between the two areas in the north west and north eastern parts of Oxted – importantly the assessment later recognises these areas as the distinctive areas of Oxted and Limpsfield.

The Assessment does not emphasise the importance of this wedge in checking the unrestricted sprawl of development. Rather, the Assessment describes the wedge as

fields bordered on three sides by development from the town. The Assessment also asserts that the open character is decreased between the “wedge” of Green Belt land that sits between the two neighbourhoods of Oxted.

This assessment is not borne out by analysis of the character of the development forming part of the wedge. The development comprises open land and sports pitches that form part of the grounds of Oxted School and St Mary’s Junior School. The character of this part of the built up area contributes to the open character of the Green Belt and, in the same way as recreation grounds at the edge of the Green Belt are to be further investigated concerning their potential inclusion within the Green Belt, so should extensive school playing fields. Nevertheless, overall the Assessment correctly concludes that Area GBA018 checks the unrestricted sprawl of large built-up areas.

With the exception of Parcel 12, all the parcel assessments correctly conclude that this area checks the unrestricted sprawl of large built-up areas. Parcel 12 only fails to fulfil this purpose within the Assessment because it has been artificially separated through the definition of parcels from adjoining parcels which abut development. As a whole this area fulfils this Green Belt purpose.

To prevent neighbouring towns merging into one another

The Assessment considers that the gap between Woldingham and Oxted is too great for the Green Belt to be preventing the merging of the two settlements. The distance between these settlements is not considered a sufficient test as, over time, sufficient development would result in the merging of these two settlements and any Green Belt between these neighbouring towns therefore must be assisting in preventing them from merging.

The intervening topography, landscape and motorway or other roads are also seen as reasons for the two settlements not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening topography, landscape and motorway or other roads should be omitted from the analysis.

Thirdly, the Green Belt in this area provides a green buffer between the distinctive built up areas of Oxted and Limpsfield. Without the protection of the narrow gap remaining between these areas, the neighbouring urban areas would merge.

It is clear that, if the correct tests are applied, this area performs this Green Belt function by helping prevent neighbouring towns merging into one another and the Assessment should be amended accordingly.

To assist in safeguarding the countryside from encroachment

All the parcel assessments conclude correctly that this area performs the purpose of safeguarding the countryside from encroachment.

To preserve the setting and special character of historic towns

The assessment applies the test of the visual relationship between a designated conservation area and the Green Belt. The Green Belt purpose, however, is not reliant on the proximity of a designated Conservation Area. Indeed, the Green Belt can preserve the setting of an historic town without abutting a designated Conservation Area.

The assessment also misinterprets the Historic England definition of setting and focuses on only views out from the Conservation Area. Historic England state that although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors and does not depend on there being public access or views to experience that setting.

It is clear that, if the correct tests are applied, this area performs this Green Belt function by helping preserve the setting and special character of Woldingham (including the adjacent Woldingham Conservation Area and Oxted (including the adjacent Limpsfield Conservation Area) and the Assessment should be amended accordingly.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose, focusing development within the built up areas.

Conclusion

All the parcel assessments conclude correctly that Areas GBA 5, 6, 7, 12 and 18 exhibit the essential Green Belt characteristic of openness. The Assessment concludes that all areas fulfil at least two of the Green Belt purposes. The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness. The importance of the green wedge between Oxted and Limpsfield should be emphasised.

In addition, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the purposes are re-assessed using appropriate methodology, it can be seen that all these areas in the gap between Woldingham and Oxted fulfil all of the Green Belt purposes. The Assessment should be amended accordingly.

The Green Belt areas around Woldingham (GBA5, GBA6, GBA7) are part of the original Metropolitan Green Belt and also continue to fulfil the original purpose of the Green Belt which is to contain the sprawl of London.

For these reasons, Areas GBA 5, 6, 7, 12 and 18 should be retained in the Green Belt.

Gap between Woldingham and Caterham (Areas GBA 5 and 6)

Openness

Both the parcel assessments conclude correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas

Both the parcel assessments conclude correctly that this area checks the unrestricted sprawl of large built-up areas.

To prevent neighbouring towns merging into one another

The Assessment considers that the gap between Woldingham and Caterham is too great for the Green Belt to be preventing the merging of the two settlements. The distance between these settlements is not considered a sufficient test as, over time, sufficient development would result in the merging of these two settlements and any Green Belt between these neighbouring towns therefore must be assisting in preventing them from merging.

The intervening topography and landscape are also seen as reasons for the two settlements not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening topography and landscape should be omitted from the analysis.

It is clear that, if the correct tests are applied, this area performs this Green Belt function by helping prevent neighbouring towns merging into one another and the Assessment should be amended accordingly.

To assist in safeguarding the countryside from encroachment

All the parcel assessments conclude correctly that this area is safeguarding the countryside from encroachment.

To preserve the setting and special character of historic towns

The assessment applies the test of the visual relationship between a designated conservation area and the Green Belt. The Green Belt purpose, however, is not reliant on the proximity of a designated Conservation Area. Indeed, the Green Belt can preserve the setting of an historic town without abutting a designated Conservation Area. In this case Area 6 abuts the Woldingham Conservation Area. If it were not for the artificial parcelling of land which subdivides Area 6 from Area 5, the combined areas which form the setting of the western side of Woldingham would be assessed as fulfilling this Green Belt purpose.

The assessment also misinterprets the Historic England definition of setting and focuses on only views out from the Conservation Area. Historic England state that although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors and does not depend on there being public access or views to experience that setting.

It is clear that, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the correct tests are applied, this area fulfils this Green Belt function by helping preserve the setting and special character of Woldingham (including the abutting Woldingham Conservation Area) and the Assessment should be amended accordingly.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose. focusing development within the built up areas.

Conclusion

Both the parcel assessments conclude correctly that Areas GBA 5 and 6 exhibit the essential Green Belt characteristic of openness. The Assessment concludes that both areas fulfil at least two of the Green Belt purposes. The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness. In addition, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the purposes are re-assessed using appropriate methodology, it can be seen that both these areas forming the gap between Woldingham and Caterham fulfil all of the Green Belt purposes. The Assessment should be amended accordingly.

The Green Belt between Woldingham and Caterham (GBA 5 and GBA6) are part of the original Metropolitan Green Belt and also continue to fulfil the original purpose of the Green Belt which was to contain the sprawl of London.

For these reasons, Areas GBA 5 and 6 should be retained in the Green Belt.

Oxted Historic Western Fringe (Areas GBA 17, 23 and 24)

Openness

All the parcel assessments conclude correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas;

All the parcel assessments conclude correctly that this area checks the unrestricted sprawl of large built-up areas.

To prevent neighbouring towns merging into one another

The Assessment is inconsistent in considering the gap between Oxted and Old Oxted.

In relation to Parcel 23, the Assessment states:

Even though Old Oxted and Oxted have merged, there is a gap between the settlements in relation to this parcel, in conjunction with GBA 024... The two settlements are different in character and a reduction in the gap provided by the northern part of this parcel could compromise the separation of these settlements... As such, this parcel is generally effective at serving this purpose.

The Assessment includes reference to intervening trees preventing a visual coalescence but this rationale misinterprets the Green Belt role as the test is not what else performs a role in preventing the merging of settlements but whether the Green Belt performs this role. Reference to intervening trees should be omitted from the analysis.

In relation to Parcel 24, the assessment states:

Old Oxted and Oxted have already merged together. There is a very small gap between the settlement boundaries on a map but this is made up of residential gardens and therefore does not provide a physical gap on the ground.... However, the town settlements are different in character and this is noticeable on the ground too. Further, the joining of the settlement occurred before the Green Belt designation.... Part of the parcel in the far western corner sits between two different neighbourhoods of Oxted and Old Oxted, although these are not considered to be separate towns their different characters are noted and it is recognised the Green Belt has some role in maintaining this.

It is clear that, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, the combined area of 17 and 24 perform this Green Belt function by helping prevent Oxted and Old Oxted from merging and this should be stated clearly in the Assessment.

To assist in safeguarding the countryside from encroachment

Within GBA 017, the Oxted Sandpit is referred to as if it is still operating. In fact, it is awaiting restoration having been deleted from the Surrey Minerals Plan in 2011 and this

inaccuracy must be corrected. The parcel assessment for Parcel 17 concludes correctly that this area is safeguarding the countryside from encroachment.

No justification is given for considering Parcel 23 only moderately fulfils this function. The fact that it fulfils this function should be recorded without qualification, consistent with adjoining areas.

The presence of Old Oxted within Parcel 24 is given as the reason for this area not safeguarding the countryside from encroachment. Although initially inset from the Green Belt, Old Oxted was included in the Green Belt in 1986. Importantly, the Green Belt is safeguarding the extensive countryside within and outside Oxted from encroachment. The Assessment is entirely wrong to conclude that Parcel 24 does not fulfil this Green Belt purpose and this inaccuracy should be corrected.

To preserve the setting and special character of historic towns

Area 17 borders the Old Oxted Conservation Area. The area also includes the large estate formed around the Grade 1 listed building, Barrow Green Court – itself part of the setting and special character of the setting of Old Oxted.

The artificial parcelling of land which subdivides Area 17 from Area 24 diminishes the role which the combined area plays in the setting of the Old Oxted Conservation Area.

Part of the Broadham Green Conservation Area is located in this area and the Green Belt clearly plays an effective role in preserving the setting and special character of the Conservation Area.

It is clear that, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, the Green Belt helps preserve the setting and special character of Old Oxted and Broadham Green along this historic western fringe of Oxted.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose, focusing development within the built up areas.

Conclusion

All the parcel assessments conclude correctly that Areas GBA 17, 23 and 24 exhibit the essential Green Belt characteristic of openness. The Assessment concludes that all areas fulfil at least two of the Green Belt purposes. The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness. In addition, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the purposes are re-assessed using appropriate methodology, it can be seen that all these areas on the Oxted historic western fringe fulfil all of the Green Belt purposes. The Assessment should be amended accordingly.

The Assessment does not consider Old Oxted Conservation Area to be open saying the surrounding development emphasises the built form and therefore the settlement has been identified as an area for further investigation. The area has been within the Green Belt since 1986 and little has changed in terms of development as a consequence of the Green Belt and Conservation Area designations. For these reasons it is expected that any further investigation of the Green Belt in this area would confirm continued Green Belt designation.

For these reasons, Areas GBA 17, 23 and 24 should be retained in the Green Belt.

Oxted Eastern and Southern Fringe (Areas GBA 19, 20, 21 and 22)

Openness

All the parcel assessments conclude correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas

Parcel 22 is correctly assessed as fulfilling this Green Belt purpose.

Not all of Parcels 19 and 20 are considered to be checking the unrestricted sprawl of large built-up areas.

Although Parcel 19 contains woodland and open agricultural fields the Assessment states that it also contains a number of differing land uses including residential areas, a large sand extraction site and adjoining industrial area, a motorway service station and a golf course. However, Limpsfield Chart residential area was included within the Green Belt in 1986 and should not be cited as a reason for the area not fulfilling the purpose of checking the unrestricted sprawl of a large built-up area. The minerals working and golf course and related buildings are not inappropriate development within the Green Belt and should not be cited as reasons for the area not fulfilling the purpose of checking unrestricted sprawl. With a more accurate assessment of the appropriateness of the types of development and the historic designation of the Green Belt in this area, the Assessment should conclude that Parcel 19 fulfils this purpose of the Green Belt.

The Assessment considers that there are anomalies where certain properties are excluded from the Green Belt whilst others are contained within it and around the boundary between the Green Belt and the recreation ground in the urban area. For this reason, this area is recommended for further investigation. Only if an area was not originally within the Green Belt and a significant amount of development was considered inappropriate for the Green Belt should any further investigation be carried out. If the recreation ground fulfils the purposes of the Green Belt then it should be included within it.

Parcel 21 only fails to fulfil this purpose of checking unrestricted sprawl because it has been artificially separated from adjoining parcels which adjoin the built up area.

As a whole this area fulfils this Green Belt purpose and Parcel 21 should be considered alongside Parcels 19 and 20 in the Appraisal.

To prevent neighbouring towns merging into one another

In relation to Parcel 19, the Assessment considers the gaps between Limpsfield and Limpsfield Chart and Oxted (Limpsfield) and Westerham are too great for the Green Belt to be preventing the merging of the two settlements. The distance between settlements is not considered a sufficient test as, over time, sufficient development would result in the merging of these two settlements and any Green Belt between these neighbouring towns therefore must be assisting in preventing them from merging.

The intervening wooded character and topography is also seen as a reason for Limpsfield and Limpsfield Chart not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening topography and landscape should be omitted from the analysis.

In relation to Parcel 20, the Assessment correctly recognises that Oxted and Hurst Green are different in character and that the parcel acts as a buffer between Oxted / Hurst Green and Limpsfield Chart. The Green Belt provides a green wedge between the distinctive built up areas of Oxted and Hurst Green. Without the protection of the narrow gap remaining between these areas, the neighbouring urban areas would merge.

The intervening woodland and topography is also seen as a reason for Oxted and Hurst Green not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening topography and landscape should be omitted from the analysis.

In relation to Parcel 21, the Assessment accepts that the north western corner of the parcel acts as a buffer between Oxted and Limpsfield Chart. However, the intervening woodland and topography is also seen as a reason for Oxted and Limpsfield Chart not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening topography and landscape should be omitted from the analysis.

It is clear that, if the correct tests are applied, this area performs this Green Belt function by helping prevent neighbouring towns merging into one another and the Assessment should reinforce this point.

To assist in safeguarding the countryside from encroachment

The presence of development (in particular the Tileworks and properties within the Green Belt at the settlement edge) are given as justification for further investigation of this area and it will be necessary to establish how much development was already present at designation in 1986. Nevertheless, as a whole this area fulfils this Green Belt purpose and Parcel 21 should be considered alongside Parcels 19 and 20 in the Appraisal.

To preserve the setting and special character of historic towns

The western part of this area is adjacent to, and contains a small part of, the Limpsfield Conservation Area. The artificial parcelling of land which subdivides Area 19 from Area 20

diminishes the role which the combined area plays in the setting of the Limpsfield Conservation Area.

The assessment applies the test of the visual relationship between a designated conservation area and the Green Belt. The Green Belt purpose, however, is not reliant on the proximity of a designated Conservation Area. Indeed, the Green Belt can preserve the setting of an historic town without abutting a designated Conservation Area. No justification is given for considering Parcel 19 only moderately fulfils this function. The fact that it fulfils this function should be recorded without qualification, consistent with other areas and HE methodology.

The assessment also misinterprets the Historic England definition of setting and focuses on only views out from the Conservation Area. Historic England state that although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors and does not depend on there being public access or views to experience that setting.

It is clear that, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the correct tests are applied, this area performs this Green Belt function by helping preserve the setting and special character of Limpsfield (including the Limpsfield Conservation Area).

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose, focusing development within the built up areas.

Conclusion

All the parcel assessments conclude correctly that Areas GBA 19, 20, 21 and 22 exhibit the essential Green Belt characteristic of openness. The Assessment concludes that Area 22 fulfils at least two of the Green Belt purposes. The other areas are considered incorrectly to only fulfil one of the Green Belt purposes.

The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness. In addition, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the purposes are re-assessed using appropriate methodology, it can be seen that all these areas comprising the Oxted Eastern and Southern Fringe fulfil all of the Green Belt purposes. The Assessment should be amended accordingly.

There are two instances where the Assessment considers the line between town and countryside are blurred: when the recreational spaces form part of the settlements (even though they are more suited to the open countryside that sits outside the inset settlement) and these two recreational spaces have been identified as areas for further investigation.

Further, the Green Belt plays an important role in the setting of the Conservation Area and therefore has been identified as an area for further investigation. The area has historically been within the Green Belt and little has changed in terms of development as a

consequence of the Green Belt and Conservation Area designations. For these reasons it is expected that any further investigation of the Green Belt in this area would confirm continued Green Belt designation.

For these reasons, Areas GBA 19, 20, 21 and 22 should be retained in the Green Belt.

Oxted Southern Fringe (Areas GBA 22 and southern part of 23)

Openness

Both the parcel assessments conclude correctly that this area exhibits the essential Green Belt characteristic of openness.

To check the unrestricted sprawl of large built-up areas;

Both the parcel assessments conclude correctly that this area checks the unrestricted sprawl of large built-up areas.

To prevent neighbouring towns merging into one another;

The Assessment considers the gap between Oxted and Edenbridge is too great for the Green Belt to be preventing the merging of the two settlements. The distance between settlements is not considered a sufficient test as, over time, sufficient development would result in the merging of these two settlements and any Green Belt between these neighbouring towns therefore must be assisting in preventing them from merging. The intervening woodland and railway line is also seen as a reason for Oxted and Edenbridge not merging. This rationale misinterprets the Green Belt role of this area as the test is not what else performs a role in preventing merging of settlements but whether the Green Belt performs this role. Reference to intervening woodland and railway line should be omitted from the analysis.

To assist in safeguarding the countryside from encroachment;

Both the parcel assessments conclude correctly that this area safeguards the countryside from encroachment. The Assessment states that Area 23 is only moderate at serving this purpose because of the presence of small isolated buildings and a sewage treatment works. The existence of development present at the designation of the Green Belt should not result in it being cited as a reason for only a 'moderate' performance. This approach is inconsistent with other parcels. The fact that it fulfils this function should be recorded without qualification for Area 23, consistent with other areas.

To preserve the setting and special character of historic towns

No recorded function.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt land in the district has the potential to serve this purpose, focusing development within the built up areas.

Conclusion

Both the parcel assessments conclude correctly that GBA Areas 22 and 23 exhibit the essential Green Belt characteristic of openness. The Assessment concludes that both areas fulfil at least two of the Green Belt functions. The Assessment is silent on assisting in urban regeneration, by encouraging the recycling of derelict and other urban land though it is clear that land in the Green Belt is also fulfilling this function. This should be added to the Assessment for completeness.

In addition, if the artificially applied parcels are not allowed to constrain the assessment of fulfilling Green Belt purposes, and the purposes are re-assessed using appropriate methodology, it can be seen that both these areas on the Oxted Southern Fringe fulfil all of the Green Belt purposes. The Assessment should be amended accordingly.

For these reasons, Areas GBA 22 and 23 should be retained in the Green Belt.