Crowhurst Parish Council would like to continue to express our opposition to the Plan proposed by Tandridge District Council, we consider that it is flawed in its preparation and in the numbers provided. The issues identified do not, in our opinion, reflect the issues that are actually relevant in the district and the ambitions of the council stated within the plan do not as a consequence reflect reality.

The Parish Council is currently developing its own Neighbourhood Plan and through that process the consultation has concluded that residents place a high value on the Green Belt and the local environment. The Parish Council are opposed to the development of a Garden Community in any site within the district due to its impact on neighbouring settlements, in addition to its detrimental impact on the Green Belt and becoming a ‘dormitory commuter community’. The proposed site for the development of a Garden Community in South Godstone would have a dramatic effect on the Parish of Crowhurst and the local infrastructure which is used by our residents, including roads, Health facilities, schools and as a rural Parish we are concerned with the critical state of this infrastructure before any development and further housing will simply tip the balance into an even more unsustainable position.

Crowhurst, a rural hamlet, in the heart of the Tandridge district, accepts that some development is necessary to meet an increased need for housing and is supportive of development on brownfield sites within sustainable communities to meet this need. We support the retention of the Green Belt to protect the district and its environment from Urban Sprawl and the merger of different settlements. We also support the protection of open spaces, sports, play, recreational facilities and the protection of the countryside. We consider that each Parish should be responsible for its local area and specify within its Neighbourhood Plan where any development can be accepted and where a Neighbourhood Plan is not in place, increased consultation should be undertaken.

Two of the Consultations conducted have taken place over major summer holiday periods, whilst one has included the festive season, both of which cause Parish Councils problems with gaining sufficient community engagement and, in addition, ensuring any Council meeting to provide feedback is quorate. It is considered that this is a deliberate act by Tandridge District Council (TDC) to reduce community feedback.

In each of the consultation stages TDC have provided an online tool on which to provide feedback, in addition to an email address for a free style option. The online tool leads the responder to provide TDC desired responses and therefore as a Parish Council we have actively guided Parishioners to provide free style feedback via email.

We also have some specific statements we would like to make, as noted below:

**The Garden Community – (renamed from Garden Village)**

**The Council have failed to appropriately engage with Tandridge residents and have not considered the results of any engagement undertaken proportionally.**

Tandridge residents have never been asked if they thought a ‘Garden Community’ was a good option. The first consultation, Options and Approaches (Dec 15 to Feb 16), asked if the option of an urban extension or ‘Garden Village’ should be *investigated.* Approximately 4% of all respondents supported the idea of such *investigation* yet the idea of a Garden Community was taken forward to the next (sites) consultation, (4 Nov to 30 Dec 2016). The largest number of responses in this consultation were in opposition to the two sites selected as the indicative Garden Community locations (Blindley Heath & South Godstone) within the current consultation.

The Preferred Strategy (March 2017), which put forward the ‘Garden Village’ idea (in one of 4 locations) was never subject to consultation. The Garden Villages Consultation 14 August to 9 October 2017 jumped to asking ‘which one’ with no option to say none. This is considered to be in breach of obligations. The response to the consultation identified that just 5% of respondents supported the idea of a Garden Village at all.

**The South Godstone Garden Community Site is undeliverable** within the time frame of the local plan (2013 to 2033). The land parcels are not all signed in to the proposal, and some may never sign over to developers, therefore the proposal does not have a specific site and is called a ‘search area’.

**The infrastructure is undeliverable**. The infrastructure directly required by the Garden Community is not specified and there is an unrealistic ambition for the 4,000 houses to deliver the infrastructure requirements not only to serve the new community but also address the deficit across the district. The infrastructure required by the Garden Community is extensive (listed in the Infrastructure Delivery Plan) and includes:

* Improve the M25/A22 interchange which is already at capacity; will require closure of M25 for duration of works
* Upgrade Godstone Station. The Redhill/Tonbridge line has been downgraded with no direct London services. Any increase in trains (numbers and/or longer trains) cannot be accommodated on the East Croydon Line;
* The A22 will need significant improvements, not costed;
* The railway bridge at South Godstone is a bottleneck and the railway line is a ‘barrier’ which will split any settlement;
* Schools, and other services within the new settlement are not costed. Note; new secondary schools must be Free Schools under current legislation;
* New medical centre will result in closure of Pondtail Surgery in Godstone.

**Insufficient realistic employment opportunities** within a sustainable travelling distance of the proposed Garden Community. Employment proposals in the Local Plan are unsubstantiated and also will not provide jobs within the first part of the plan period. The Jobs proposed are mainly warehousing and distribution jobs (e.g. Hobbs Industrial Estate), and the lower paid workers within such roles are not likely to be able to afford housing within the district, even if considered ‘affordable’.

Currently more than 60% of all residents in employment, travel to work outside of the district. The affordability of the new houses will preclude local workers being able to buy/rent and place a far greater burden on our already stressed transport infrastructure.

**Large scale harm to the Green Belt**. The Loss of a large area of Green Belt without sufficient justification to do so, and the lack of joined up thinking between Local Authorities will cause the wider Green Belt to become fragmented and therefore not fulfil its purpose of preventing urban sprawl, especially when the Redhill Aerodrome is brought forward for housing by the adjacent authority, Reigate and Banstead.

**Rural Exception Affordable Housing Schemes**

**Allocating a development of up to 20 units of housing in Crowhurst is unsustainable and not compliant with National Policy**. Crowhurst is classified as a ‘limited and unserviced settlement’. The housing within Crowhurst is scattered over 3.7 sq miles having approx. 124 dwellings in 8 distinct settlements with no central nucleus. An increase of 16% in a rural and unsustainable location where a housing needs survey, conducted for Neighbourhood Planning purposes, states that we do not need any increase is not acceptable and the rationale for this proposal by TDC is flawed and lacking evidence.

In policy TLP09 (page 64, Our Local Plan) it is sated that ‘the Council will support the development of Rural Housing Exception Sites for up to 20 Affordable housing units as set out in TLP13’. Crowhurst is not a sustainable location for this type of housing and 20 units is a disproportionally large development and out of character with the existing parish structure. Crowhurst has no services other than a twice weekly bus, and this makes any housing entirely reliant upon cars to gets to shops, schools, etc. This policy would change the overall dynamics of the socio-economic mix of the community and would be damaging.

The policies (TLP09 and TLP13) do not limit the *number of sites* coming forward for Crowhurst. The constraint requiring the delivery to meet an identified need in a parish/council approved Housing Needs Survey could be challenged as the National Policy includes provision of housing within Rural Exception Sites for people with an employment connection as well as for local residents. This means the TLP13 is not complaint with the NPPF.

**Infrastructure Delivery Plan**

**Undeliverable Infrastructure**. The Local Plan sets out an ambitious delivery plan, listing delivery of education, health, flood prevention and transport infrastructure which is essentially addressing the current deficit. Any requirement for a development to provide contributions to make up a current deficit is unreasonable and precluded in the 6 tests for planning conditions in the NPPF (para 206), where they must be ‘relevant to the development permitted’. **This is not compliant with National Policy.**

The risk is that development going forward will not deliver the infrastructure requirements for the development in advance, resulting in additional and unacceptable burdens will be placed on the existing services until the developers have accrued sufficient income to fund the contributions, which would be a matter of the planning condition being considered ‘reasonable’. This unacceptable burden on the existing infrastructure is unsustainable.

Not only does the 2018 Infrastructure Delivery Plan set unsustainable and unrealistic objectives for the first part of the plan period, much will be completely undeliverable as the key stakeholders such as the NHS providing doctors and Surrey County Council providing teachers cannot guarantee the finance for, or even the actual staff to fill the new vacancies. The other key factor not costed is the land required to build the expanded schools and surgeries, etc, as without exception, the current provisions are constrained by their current sites.

Some of the proposals in the Infrastructure Delivery Plan are **not based on facts**.

**Retention of the Green Belt**

The National Planning Policy Framework includes a Greenbelt policy and it is an obligation for local authorities to have due regard to such policies. The Greenbelt Policy is clear that a Green Belt boundary may be altered only in exceptional circumstances and whilst exceptional is not defined, the alterations proposed within the Tandridge Plan are not considered to be exceptional, the Greenbelt assessments provided are weak and do not consider all of the 5 required factors. In addition, the ‘parceling’ of the land throughout the district has resulted in assessments being made in relation to Green Belt relevance, in complete isolation to the neighbouring parcels. We consider that this process is faulty and could be manipulated to achieve the desired outcome.

The Vision noted within the Tandridge Plan, specifies how the district will look in 20 years time, but unlike the Tandridge District Core Strategy, published in 2008 and with an 18 year time period (to 2026) does not mention the Green Belt. The Green Belt is something that is critical for the retention of the high quality of life that we all enjoy within the district, stopping urban sprawl, the joining of settlements and the outward spread of London. It is a large percentage of the district land and must be recognised as an asset.

**Core Strategy vs. Tandridge Plan**

The Core Strategy document dated 2008 notes a number of issues facing the district and few are repeated in the Tandridge Plan, yet these are considered to be vitally important to the district:

1. Retention of Green Belt
2. Protection of the countryside, in particular AONBs
3. Adequate infrastructure (water, drainage) and services (health, social care and education) to accompany new development
4. Adequate housing (sustainably located and constructed)
5. Encourage reuse of previously developed land
6. Adequate transport infrastructure and services
7. Protection and provision of open space, sports, play, recreational, community and cultural facilities
8. Protection, management and enhancement of biodiversity
9. New development constructed in accordance with sustainability principles – location, energy conservation, renewable energy sources solar.
10. Safe & Secure Communities

**Consultation Process**

The Gunnings Principles, which are adopted by the Council, sets case law that *consultation* has to achieve 4 purposes:

1. Consultation must take place when the proposal is at the formative stage. (The plan appears very well developed, when reviewing all the supporting documentation and is not presented in a form whereby the majority of people are able to respond).
2. Sufficient reasons must be put forward for the consultation, for intelligent consideration and response (Rationale is limited to housing need – which is seriously flawed).
3. Adequate time must be given for consideration and response; (The consultation periods appear to deliberately occur over school holidays in each instance, therefore ensuring consultees are absent or otherwise unable to respond).
4. The product of the consultation must be conscientiously taken into account.

In addition, consultation must not be tokenistic (where there is a predetermined outcome) and this is what this ‘Consultation’ definitely is, a token gesture. The outcome is already known - more houses on the Green Belt. See [www.gov.uk/government/publications/consultation-principles-guidance](http://www.gov.uk/government/publications/consultation-principles-guidance)

We also understand that parties which are compulsory consultees within the various stages of the process have either never received correspondence, such as the Oxted Health Centre, or received invitations to attend briefing sessions so late that they could not attend (Parish Councils); therefore ensuring that appropriate feedback is not received. Apparently 10 surgeries were asked for their comments and TDC received ‘no responses’ to at least one stage of the process.

**Housing development**

There is no evidence to support the number of houses planned for the district. The Strategy document, dated 2008 and ratified 2014, anticipated little growth in the number of people in the district. Indeed from experience over the previous 10 years it showed less than 7% growth. This document emphasised the importance of the Green Belt to the quality of life within the district, but this receives no mention in the current plan. The people of Tandridge district wish to retain the Green Belt and the quality of life that they experience. Increasing housing density and changing the designation of Green Belt land will serve to increase crime, increase demand on surgeries due to decreasing health and generally cause a strain on the fabric of society. All of these are noted as current issues in your document and none of which are considered to be current issues, but they will become such if considerable development takes place.

We question the basic tenet that Tandridge can provide even 1000 extra houses let alone 10,000, without destroying the character of the local area and encroaching significantly onto the Green Belt, flood plains and damaging the designated areas of natural beauty.

**Flawed statistics**

We also question the statistics used to prepare the Tandridge Plan.   We understand that the Government sets the formulae for the calculation of housing requirements, but then the District Council (in this instance) is responsible for filling in the blanks, with few checks and balances. The results show population growth at 4 times the amount considered within the Core Strategy, only 8 years later, yet neighbouring districts are containing their own Growth… we request that you publicise the data behind the stated housing calculation.

**We would also like to highlight the issues that are key to our residents:**

**Medical facilities**

There are a significant lack of GP places and timescales to gain an appointment is unacceptable at the present time. Lingfield Surgery already has one of the highest doctor to patient ratios in the country and the ability to get an appointment is very difficult indeed. The nearby hospitals are small and East Surrey hospital is often stretched to its limits.  No other hospital is within easy distance in an emergency.

**Roads**

The A22 and A25 are both roads that are very busy and which often have traffic jams due to all the through traffic as well as local traffic. The M25 is often jammed, therefore is not a viable alternative even for a short commute between Junction 6 and Junction 8.

**Commuting by rail**

Parking at the local stations is expensive and insufficient; this causes commuters to park on the roadsides, which in turn causes traffic flow problems throughout the day. Given the reliance on commuting to work, Tandridge should look to provide additional parking facilities next to railways stations to keep cars off the roadside and focus on the development of new homes within walking distance of local stations.

**Broadband**

High speed broadband is not available (or even planned) in existing areas. Having such facility would enable people to work from home, increase demand for small office space locally and could be an overall benefit to Tandridge.

**Schools**

Local schools are oversubscribed. There are already instances of local parents having to travel out of area to get a child into a school, furthermore some schools can no longer guarantee places for siblings because of the pressure on places requiring parents to travel to more than one school location twice a day!  This would be intolerable for those who work too. It also divides communities and destroys the cohesion that local children attending a local school provides.

Keeping schools within walking distance of homes would again keep cars off the roads, alternatively the provision of school buses across the district would be necessary.

**Flooding**

Flooding is a major issue in Tandridge, main roads are frequently flooded and impassable and minor roads see this problem even more frequently. Development on flood plains is irresponsible and shows a complete lack of foresight, increasing the problem of flooding for a wider area thereafter. It is noted that the development on a flood plain in Blindley Heath remains an option; this would not only impact the immediate area, but would have an impact downstream to Edenbridge.

**Leisure and recreation**

Access to appropriate leisure facilities is lacking within the district, forcing residents to drive long distances to the nearest facility, or to do nothing. It is further noted that your plans propose to develop on current recreational grounds, therefore reducing the availability of such facilities even further.

**Access to shops**

There are a large proportion of senior residents in Crowhurst, some of which have access to a car and can therefore travel to shops, others rely on the weekly bus service to get out. The nearest shops are in Lingfield. We need to ensure that the quality of shops in Lingfield does not reduce further and also must ensure that the bus service to local towns continues.