



## **Response to the Local Plan Garden Villages Consultation – October 2017**

Lingfield Parish Council objects to the proposal for any Garden Village in Tandridge for the following reasons.

### **1. Transport Network**

There is insufficient capacity on roads and railway to cater for the proposed increase in use. 65% of journeys to work out of Tandridge are by car and 28% by train. (2011 Census). Train use is unlikely to increase as there is no room for expansion at East Croydon junction so the number and length of trains running through the district is constrained. East Grinstead, Tonbridge and Caterham lines which serve the district all pass through East Croydon junction.

The impact on the road network of any of the proposed sites is acknowledged in the Garden Village consultation evidence as follows:

*'It should be noted that all the sites would likely increase traffic flow on rural lanes which may not be suitable for additional traffic without mitigation.'*

In regard to the Blindley Heath and South Goldstone sites, the consultation notes that the impacts will be additionally at:

*'M25 junction 6 and the junction of the A264 and A22 in Felbridge ' (page 15 <sup>1</sup> ).*

The transport report provided for this consultation ignores the findings of the Strategic Highway Assessment Report (SHAR, 2015) undertaken by Surrey County Council for the first Regulation 18 Consultation. This assesses the potential impacts of each of the Approaches from Tandridge's **Issues and Approaches** document. In regard to the impact on the roads in and around the parish of Lingfield the SHAR concludes that:

*'Scenarios 3 and 5 are forecast to have the greatest impacts, both in the south and north of the district. In some locations effects are expected to be experienced some distance from proposed development locations reflecting the potential cumulative impacts on existing roads and*

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<sup>1</sup> Surrey County Council Transport & Accessibility Assessment of Potential Garden Village Locations 2017

*junctions. These include links and junctions in such areas as Blindley Heath and Newchapel' (5.1.8 page 54)*

The report also adds that absolute flows will increase with Approach 3, with some local roads such as Byers Lane, Bones Lane and Smallfield Road having increases in excess of 100%. With the M25 set to be at capacity between Junctions 6 and 7 by 2020, and the A22/A264 junction at Felbridge also at capacity, the roads are going to be very congested by delivery of Approach 3 even before any work is started on a Garden Village.

Furthermore we note that the SCC Transport & Accessibility Assessment was produced without the increases in size of the Redhill Aerodrome and Blindley Heath sites presented in this consultation, so the conclusion on the impacts needs to include the additional flows that will result, should either be delivered.

## **2. Health Facilities**

GP Surgeries are already overloaded, in particular the Lingfield Surgery, which has a large catchment area. Although a new health centre is proposed as an objective for a Garden Village development, the information provided for the four broad locations indicate existing surgeries would need to be expanded or relocated.

In the case of the Edenbridge site, this would involve working with another Clinical Commissioning Group and Edenbridge has already started to make provisions to reorganise their own medical facilities to streamline the cottage hospital and surgery. With increased pressure from additional housing through Approach 3, the Lingfield Surgery will need to be expanded and whilst this may address the current physical capacity issues, it will be dependent on the availability of GPs. The national shortage of GPs may well impact any new medical centre just as it impacts on the existing surgeries in Oxted and Lingfield. The complex funding arrangements for NHS facilities may make a completely new medical centre undeliverable.

## **3. Education**

Primary and secondary schools in the area are over-subscribed and could not provide extra spaces to cope with additional pupil numbers before new schools are built. In addition, Surrey County Council is under extreme financial pressure and may not be able to fund or staff new schools. West Sussex, the adjoining county, provides places for children from Lingfield and Dormansland in primary and secondary schools in East Grinstead. However with extensive house building, East Grinstead is experiencing a population rise and the catchment areas for the schools is shrinking. These schools can't be relied upon to take children from Lingfield in the near future.

## **4. Employment**

As the worst performing district in Surrey in economic terms<sup>2</sup>, Tandridge has very few growth opportunities for employment. Any new Garden Village may provide some employment in retail or the service sector. However the majority of the residents will commute out of the district for work and as already noted, this will be mostly by car. The district has a very low unemployment rate (below 3%, Nomis, 2016) which combined with the already congested road and rail network, does not make the area attractive to new businesses when investment in Crawley and Gatwick is already providing competition.

## **5. Green Belt**

The loss of a significant portion of Green Belt is contrary to the National Planning Policy Framework (NPPF, 2012), which specifies it as a justifiable constraint on housing delivery. The lack of local employment, the over reliance on the car for transport and the harm to the Green Belt would not in the Parish Council's view be justified.

The Garden Village documents give no detail of the Exceptional Circumstances which could justify release of Green Belt. The loss of the Green Belt for the Garden Village needs to be considered along with the additional pressure on new roads and other infrastructure. The council's Sustainability Appraisal<sup>3</sup> for the Garden Village sites confirms that the impact on the environment, in terms of congestion and pollution, will be considerable because of the reliance on cars as the primary means of transport. The Green Belt in Tandridge is part of the Metropolitan Green Belt and serves a very useful purpose in mitigating for the capital's poor air quality as well as providing open countryside as an amenity for Londoners.

The Sustainability Appraisal identifies loss of biodiversity opportunities with increased urbanisation, especially with the loss of field systems and hedgerows. It also identifies the loss of significant portions of Grade 3 agricultural land which is currently producing food products. This harm to the environment needs to be added to the loss of similar Green Belt land around the Tier 1 and 2 settlements as part of the Green Belt release. Cumulatively the impact will be detrimental to the whole area.

## **6. Objectively Assessed Need (OAN)**

Members believe the OAN is too high as it skewed because of recent over-delivery of housing by the district, and does not reflect the ability of the area to sustainably support a larger population. Tandridge does not have a 'capital' town, it has no further education facilities and no hospital. Large employers are moving out, there is an underdeveloped road network, rail capacity restrictions and there are significant

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<sup>2</sup> Matthews Associates & TSE Research Tandridge Economic Development & Business Study. Report on Research Findings 2014

<sup>3</sup> Lepus Consulting Sustainability Appraisal for Tandridge District Council Regulation 18 - Potential Garden Village Locations 2017

portions of AONB and flood risk areas. These were all factors in the population of the district declining in the 1970s as the area is essentially a rural backwater. The only thing that has changed in the district is the delivery of a considerable number of houses pushing the population growth trajectory beyond what the district can sustainably accept.

By accepting the current OAN as the starting point for housing delivery, the council is ignoring all the above factors when it is clear that government direction and the NPPF insist that Green Belt and other constraints have to be part of the discussion about delivery.

## **7. Flood Risk**

The sites at South Godstone, Blindley Heath and Edenbridge are all on heavy poorly draining soils. All are at risk of flooding with Flood Zones 2 and 3 identified. These areas also act like sponges, holding onto the surface run off at heavy rainfall periods. All three areas drain into the River Eden, which has caused much flooding in Edenbridge over the years. The flood defences constructed in the town work in conjunction with the “functional” floodplain of land upstream, where the excess water is ponded on the fields, with specific gaps in the embankments along the tributaries to allow the excess water to flood onto the pasture fields and not flow down to Edenbridge as a surge.

Any large-scale development will need to mitigate for these drainage issues, which is very costly and later infilling or permitted development on the Garden Village sites could have significant long-term impacts on the drainage flows. Individual houses and their supporting infrastructure will need to be constructed with flood resilience features built in, adding to the developer’s cost and reducing the surplus from which the council hope to extract infrastructure payments.

The area surrounding the village of Lingfield is essentially all flood prone and the village centre is concentrated on a small ridge above the waterlogged fields. If it was suitable land for urban growth, it would have increased once the railway was put in, much as East Grinstead or Dorking have grown. This will make delivery of the sites around the village problematic, with viability implications and altered run off patterns causing localised and general flood risk.

## **8. Deliverability of proposed sites**

The Redhill Aerodrome and Edenbridge sites are cross-border so developers will need to work with 2 local planning authorities, with different planning policies, this will impact on delivery timescales. The Redhill Aerodrome may not be deliverable within the plan period because of the need to make a connection with the M23 after the completion of the Smart Motorway works. The Edenbridge site is strongly opposed by Edenbridge Town Council and is not coming forward in the emerging

Sevenoaks local plan as a site. The Edenbridge site would rely on Kent providing the significant portion of the infrastructure for the Garden Village (roads and rail links, shopping and other facilities). This site isn't part of the Edenbridge Neighbourhood Plan either, so is unlikely to go forward within Tandridge District Council's local plan cycle.

The South Godstone and Blindley Heath site promoters do not have control of all the land within their proposals and this may be a problem in delivering sufficient housing to fund the infrastructure promised by the council.

Another fact which will impact on delivery for the sites in the south of the district is the impact on the Ashdown Forest Special Protection Area. This has been recognised as a significant issue in the Tandridge documents in terms of air quality. However, Approach 3 includes building on open spaces within settlements, which will displace dog walkers and other outdoor activities to venues reached by car, including the Ashdown Forest itself. Already residents of Tandridge visit this area for outdoor recreation; this will only increase, not just because of the additional population in the district but because there is less available open space in Tandridge, including the informal areas currently used by dog walkers.

#### **9. Approach 3's impact on infrastructure**

We understand that if the Garden Village goes ahead, some of the houses will be built before any additional infrastructure is provided. This will add pressure to local facilities which are already overstretched. The release of Green Belt sites, especially around Lingfield will make the situation untenable, if as indicated in the Preferred Strategy, the quantum of houses in each development may not bring the required infrastructure benefits. The promise of planning policies to ensure permissions would not be granted unless infrastructure contributions are forthcoming is contrary to the NPPF direction on Planning Obligations (paras 203 – 206) and will be challenged by the developers as unreasonable.

#### **10. Risk**

There is a risk that the Garden Village will be undeliverable for some or all of the factors mentioned already, in which case the promise of infrastructure solutions for the district as a whole to be delivered by the Garden Village will not materialise. There is also the risk that the developers will choose not to deliver the housing in large enough packages because of financial factors such as market conditions. Developments could also be subcontracted to smaller builders, putting any or all of the promises of infrastructure at risk because of viability issues or even market collapse. The likelihood of the district obtaining separate finance for the infrastructure is not guaranteed when more attractive locations may be chosen for funding by the Local Enterprise Partnership; namely developments in areas that have a better prospect of attracting businesses and more sustainable transport links. The

proposals as they stand do not qualify for the infrastructure funding outlined in the Government prospectus, “Locally-Led Garden Villages, Towns and Cities” (2016). They fail all the criteria for funding through this scheme and most importantly are clearly NOT locally led.

The greater risk to the district, then, if the Garden Village is not delivered, is that the wholesale scatter gun approach to development across the district will continue adding housing without any infrastructure, only this time it will build on open spaces and the Green Belt .

Lingfield Parish Council do not support ANY of the Garden Village sites, nor do they support any release of Green Belt around the village or building on open spaces without the additional infrastructure it will require.

It is noted the Preferred Strategy was not consulted on as a whole and residents have been duped into only consulting on the 'Garden Village' part. There has been no publicity surrounding the release of Green Belt sites around the settlements, inseting of smaller settlements, building on open spaces and increasing the densities of development within the settlements. All this development would come before any village is started making the lives of the residents in Lingfield considerably worse. Asking residents to essentially choose which site they would prefer, is by default getting them to agree the principle of accepting the whole of the Preferred Strategy without any open and transparent consultation.

It is noted that Approach 3 in the first consultation process was the most unpopular and in the supporting evidence would have almost the same negative impact on the district as Approach 5, and is not a sustainable option. It is also noted that Approach 6 in the first consultation was fielded with a loosely worded question asking for interest in investigating the idea of an urban extension or new settlement; this was not supported with any significant numbers. It is noted, then that the Preferred Strategy has very little to do with what the district needs or wants and does not reflect in any way the results of the engagements with the stakeholders to produce a “shared vision”

9th October 2017