



Dormansland Parish Council

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Tandridge District Council Local Plan 2013-2033 – Our Local Plan” Consultation (Regulation 19)

Dormansland Parish Council Response

6 September 2018

Overview

1. This document is Dormansland Parish Council’s submission in response to Tandridge District Council’s “Our Local Plan” Consultation published in July 2018 and has been approved for submission by Dormansland Parish Council (DPC).
2. DPC is fundamentally opposed to the loss of Green Belt land. Green Belt is intended to be permanent. DPC does not believe that housing pressure justifies loss of Green Belt. It is exactly the pressure for additional housing that was anticipated when the Green Belt was designated and it remains central government policy to protect Green Belt land.
3. The fact that Tandridge is 94% Green Belt is a major constraint on development and should be fully taken into account when considering an appropriate target for house building. DPC does not consider that this constraint has been given appropriate weight in the development of the TDC Local Plan and that it is therefore unsound.
4. Whilst accepting that more housing is required DPC does not agree that this should be at the expense of the Green Belt.

Comments regarding Soundness

5. DPC does not consider that the draft local Plan meets the test of soundness on the following grounds:
 - a) The plan has not been “positively prepared” in that it fails to provide evidence that the necessary infrastructure improvements arising from the proposed garden Community in South Godstone have been properly assessed nor how those that have been identified would be delivered. Of particular concern is the development’s impact on the transport network which will impact well beyond the boundaries of Tandridge.

Included as an appendix to this document is a report from the engineering consultancy firm WSP that assesses the impact of the plans on the highway network. The report concludes that the plans would create unacceptable problems of highway safety and capacity for people who live and work locally.

- b) The plan is not “justified” in that it fails to fully meet the sustainability criteria set out in the Sustainability Assessment and is therefore not in compliance with the NPPF and in any case there is a more appropriate location for a garden community.

DPC consider that the Redhill Aerodrome site is more appropriate. It has the potential to deliver more new and improved infrastructure and is therefore more sustainable than the South Godstone proposal. In particular it offers the following benefits over South Godstone:

- New M23 junction and strategic link road relieving existing pressure on existing roads
- Expansion and enhancement of East Surrey Hospital
- Local employment at East Surrey Hospital
- Provision of Key Worker Housing for hospital staff
- Direct rail link to London
- Greater use of brown field land
- Located close to centres of employment (Redhill, Reigate, Gatwick, Crawley) in the Gatwick Diamond Economic Area and the Coast2Capital LEP

- c) One of the main considerations in favour selecting South Godstone is understood to have been the timescale in which at least some of the new housing could be delivered. The timescales for the Local Plan are not set in stone as demonstrated by the fact that neighbouring districts are at different stages of developing their plans. Indeed Tandridge is ahead of its neighbours in this regard.

DPC considers that the decision on a site for a Garden Village is so important and will have such a major impact that it is imperative that the site that will give the best long-term outcomes is selected. It is reasonable to expect that a site that results in greater benefits will take longer to deliver. The meeting of an artificial time deadline should not be a reason for selecting a site that fails to maximise the benefits for the residents of Tandridge and neighbouring districts for generations to come.

Comments Regarding Legal Compliance

Finally, Dormansland Parish Council wishes to raise concern about legal compliance which the Inspector is asked to consider. Specifically, regarding the inclusion for residential development of site HSG12 “Land at the Old Cottage, Station Road, Lingfield”. This site forms part of the gap between Dormansland and Lingfield which is important in preserving the separation of the two settlements. The site was previously ruled out as being “unsuitable” for development (Sites Consultation Nov/Dec 2016). It’s sudden inclusion at the last stage of drafting the Local Plan is therefore questionable as it flies in the face of the evidence that was deemed to render it previously unsuitable. It is of particular concern that there was no consultation with Parish Councils regarding the sudden change.

Despite these concerns Dormansland Parish Council looks forward to working with Tandridge towards the delivering the vision as set out in the draft Local Plan.

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