

Chelsham and Farleigh Parish Council

E-mail: clerk@chelsham-farleigh-pc.org.uk

Local Plan
Planning Policy
Tandridge District Council
Council Offices
8 Station Road
Oxted
RH8 0BT

By e-mail to: localplan@tandridge.gov.uk and by hand to the council offices on 28 December.

28 December 2016

Dear Sir,

Representations in relation to the Local Plan Sites Consultation

Chelsham and Farleigh Parish Council appreciates the opportunity and has considered carefully many of the the documents you have posted for consultation. It wishes to offer the following comments:

1. Comments on the specific sites listed in the Sites Consultation:

WAR 008 - Land north of Green Hill Lane

- Designated as unsuitable and ruled out from further consideration, at least for the time being.
- The parish council **welcomes the decision and believes it to be the correct one.**
- To reinforce the view, it adds that to build on this area would effectively “join up” Warlingham and Chelsham, thereby undoing at least one of the five objectives of the Green Belt which are currently served by this site.
- It further believes that the assessment of Transport in the Sites Consultation should be reconsidered as the surrounding roads are completely incapable of taking the additional traffic volume that would be generated. It believes this view is shared by SCC Highways Department.
- The parish council’s comments on traffic are very similar insofar as areas WAR008, WAR011, WAR018 and WAR023 are concerned because all areas rely on the bottlenecks of Harrow Road and Chelsham Road (and in some cases Sunnybank) to exit the area to the north, the east, and the south, whilst exit to the west requires a traverse of Warlingham. The entire area is very poorly served by parking facilities and in consequence, the narrow roads are very restricted by parked cars that already inhibit two way traffic.

WAR 011 - Green Hill Lane, Warlingham

- Designated as effectively serving the purposes of the Green Belt but may still be subject to the special circumstances test.
- The parish council is of the view that this area **should not be built upon** as it would narrow the gap between Warlingham and Chelsham, thereby undoing one of the five purposes of the Green Belt which it fulfils at present, the separation of the two communities.
- It further believes that the transport scoring may be wrong in that the roads in the vicinity are incapable of sustaining any increase in traffic flow.
- As it is, the roads and homes in the area, notably Sunnybank and Chelsham Road were not designed nor intended to take the current parking and traffic volumes and it is difficult to navigate along Sunnybank or Chelsham Road without frequently having to pull in to allow oncoming traffic to pass.

- In consequence, if this site were ever to be used for housing, the parish council requests that parking be provided in excess of the foreseeable needs of the additional homes to provide space for additional parking to take it off road and thereby improve the traffic flow of the wider area.
- The parish council's comments on traffic are very similar insofar as areas WAR008, WAR011, WAR018 and WAR023 are concerned because all areas rely on the bottlenecks of Chelsham Road, Harrow Road and in this case Sunnybank, to exit the area to the north, the east, and the south, whilst exit to the west requires a traverse of Warlingham. The entire area is very poorly served by parking facilities and in consequence, the narrow roads are very restricted by parked cars that already inhibit two way traffic.

WAR 018 - Land adjacent to Kennel Farm, Chelsham

- Designated as effectively serving the purposes of the Green Belt but may still be subject to the special circumstances test.
- The parish council is very firmly of the view that this area **should not be built upon** as it would effectively "join up" Warlingham and Chelsham, thereby undoing at least one of the five purposes of the Green Belt which it fulfils at present, the separation of the two communities.
- The linking of the communities would be exacerbated in this instance by the fact that the site is not actually attached to any built up part of Warlingham so would appear to be an unwanted and unwarranted attachment of part of Warlingham to part of Chelsham.
- It also believes and suggests that the current comment on surface water **flooding** understates the actual risk.
- The Eastern corner of this field is, and has been for as long as anyone can remember, the end point for the surface water flooding for a vast area to the south, where Ledgers Road, being lower than its surrounding fields acts as the natural outlet for excessive water. The water then uses a network of ancient ditches to end up at the cross roads comprised of Harrow Road, Ledgers Road and Chelsham Road. The water then flows through "grips" that are maintained by SCC Highways for the purpose of draining the roads on to the corner of this field, where it forms a pond and eventually drains naturally.
- Were this area to be used for housing, it would constantly be at risk of flooding without a complex and expensive mechanical drainage system to pump the water uphill to suitable drainage points.
- The parish council further believes that the transport scoring may be wrong in that the roads in the vicinity are incapable of sustaining any increase in traffic flow.
- As it is, the roads and homes in the area, notably Harrow Road and Chelsham Road were not designed nor intended to take the current parking and traffic volumes and it is difficult to navigate along Harrow Road, a bus route, without frequently having to pull in to allow oncoming traffic to pass.
- The parish council's comments on traffic are very similar insofar as areas WAR008, WAR011, WAR018 and WAR023 are concerned because all areas rely on the bottlenecks of Chelsham Road and Harrow Road (and in some cases Sunnybank) to exit the area to the north, the east, and the south, whilst exit to the west requires a traverse of Warlingham. The entire area is very poorly served by parking facilities and in consequence, the narrow roads are very restricted by parked cars that already inhibit two way traffic.

WAR 023 - Land at Alexandra Avenue, Warlingham

- Designated as effectively serving the purposes of the Green Belt but may still be subject to the special circumstances test.
- The parish council is of the view that this area **should not be built upon** as it would effectively "join up" Warlingham and Chelsham, thereby undoing one of the five purposes of the Green Belt which it fulfils at present, the separation of the two communities.
- It further believes that the transport scoring may be wrong in that the roads in the vicinity are incapable of sustaining any increase in traffic flow.
- As it is, the roads and homes in the area, notably Alexandra Avenue and Chelsham Road were not designed nor intended to take the current parking and traffic volumes and it is difficult to

navigate along Chelsham Road without frequently having to pull in to allow oncoming traffic to pass.

- In consequence, if the site were to be used for housing, the parish council requests that parking be provided in excess of the foreseeable needs of the additional homes to provide space for additional parking to take it off road and thereby improve the traffic flow of the wider area.
- The parish council's comments on traffic are very similar insofar as areas WAR008, WAR011, WAR018 and WAR023 are concerned because all areas rely on the bottlenecks of Chelsham Road and Harrow Road (and in some cases Sunnybank) to exit the area to the north, the east, and the south, whilst exit to the west requires a traverse of Warlingham. The entire area is very poorly served by parking facilities and in consequence, the narrow roads are very restricted by parked cars that already inhibit two way traffic.

WAR 029 - West of Farleigh Road, Warlingham

- Designated as serving the purposes of the Green Belt and ruled out of further consideration as part of the Green Belt Assessment as any development would detrimentally affect the character of the wider landscape. Not to be subject to the special circumstances test
- The parish council **welcomes the decision and believes it to be the correct one.**
- To reinforce the view, it adds that to fill this area would effectively "join up" Warlingham and Chelsham, thereby undoing one of the five objectives of the Green Belt currently being served.
- It is a particularly attractive feature of the surrounding landscape and provides far reaching views of the attractive countryside.

WAR 033 - Land adjacent High View, Beech Farm Road, Warlingham

- This site is adjacent to WAR 034 and is at present a private gypsy camp for the exclusive use of the family of Mr. Brien, and not to exceed 4 pitches.
- It currently has pitches in excess of the permitted number and a retrospective planning application (number 2015/2203) has been outstanding since 15 December 2015 requesting 3 additional pitches.
- Designated as effectively serving the purposes of the Green Belt but may still be subject to the special circumstances test.
- The parish council is of the view that this area should **not** be considered as part of the Local Plan until such time as a separate assessment is made as part of the wider provision of gypsy and traveller sites **and** the outstanding planning application is determined.
- On these occasions there should be a proper period of consultation during which there should be an opportunity to comment more fully.
- However, in the interim, the parish council is of the view that this site should **not** be extended as a gypsy and traveller site because no valid reasons have thus far been put forward for it to be so extended.
- In addition, there is thought to be existing contamination, presumably as a result of its use as a gypsy site, which would require remediation - possibly only for it to be re-contaminated, but this of course is conjecture.
- The site is highly unsuitable for housing in sustainability terms, being isolated and some miles from the nearest public transport, health care facility, schooling or even a shop.
- Please also bear in mind that it is in an Area of Great Landscape Value and is a candidate area for the designation of Area of Outstanding Natural Beauty.
- Please reject this area for further consideration as part of the Local Plan.

WAR 034 - Caravan, High View, Beech Farm Road, Warlingham

- This site is adjacent to WAR 033 and is currently being used as an unauthorised gypsy and traveller site.
- There is a retrospective planning application (number 2015/1913) which has been outstanding since 21 October 2015 for change of use from residential to a gypsy and traveller site of no more than 4 pitches.

- The parish council is of the view that this area should **not** be considered as part of the Local Plan until such time as a separate assessment is made as part of the wider provision of gypsy and traveller sites **and** the outstanding planning application is determined.
- On these occasions there should be a proper period of consultation during which there should be an opportunity to comment more fully.
- However, in the interim, the parish council is of the view that this site should **not** be permitted a change of use to a gypsy and traveller site because no valid reasons have thus far been put forward for it to be so changed.
- The site is highly unsuitable for housing in sustainability terms, being isolated and some miles from the nearest public transport, health care facility, schooling or even a shop.
- Please also bear in mind that it is in an Area of Great Landscape Value and is a candidate area for the designation of Area of Outstanding Natural Beauty.
- Please reject this area for further consideration as part of the Local Plan.

2. Comment on the consideration of new settlements:

- It is difficult for the parish council to comment other than in a general sense because of the distance between the parish and the potential sites for a new or extended settlement.
- However, taking a high level view, it would appear that the option of a new or extended settlement may have a lesser aggregate detrimental impact on the whole of the Green Belt and the District than a fragmented approach, which would almost certainly have a greater cumulative adverse impact.
- This view will almost certainly not be shared by the residents of any area so chosen, but may draw support from the wider community.
- For any and all the options, there will be additional infrastructure requirements to be provided and whilst this may prove to be very difficult for a fragmented approach, it may be easier to plan into, and to deliver on time, in the case of a new or extended settlement.
- For these reasons, the parish council would **support** the adoption of a new or extended settlement as a major part of the delivery of housing requirements.
- These comments apply equally to Blindly Heath and South Godstone with the proviso that South Godstone may prove to be more problematic by virtue of being divided by a railway line.

3. Comments on other aspects of the current Consultation:

3.1 Objectively Assessed Need for Housing

In the Tandridge District Council's ("District") paper on Frequently Asked Questions, there is a question that states "Is the District able to deliver the 9,400 houses that the National Planning Policy Framework says we need?". The parish council would like to draw a distinction here in that it is not the NPPF that says the District needs 9,400 houses but the District's chosen consultant's interpretation of the NPPF that made the determination which has been so widely challenged, **and which continues to be challenged by us.**

This in turn raises another question on which the parish council would greatly appreciate additional information.

The parish council notes the District's comments on the Collective Response but still feels that there is insufficient explanation of the reasons why the Objectively Assessed Need for Housing (the "OAN") is so dramatically increased from the levels in the current Local Plan, the Core Strategy of 2009.

We will not reiterate the numbers but the new projection is many multiples of the previous one, the more so when the over provision of housing during the early years of the Core Strategy meant that the future annual build requirements were much reduced from the original projections.

Very specifically the parish council requests an explanation of the so called “London factor” that was cited in District Council minutes * and which was the cause of a 118% overspend on the budget for the specific consultancy work that resulted in the OAN of 9,400.

- * The minutes of the Planning Policy Committee meeting of 17 September 2015 stated at paragraph 106 that the Committee considered a budget monitoring report for the period 1 April to 31 July 2015 and noted a significant overspend, the main cause of which was the Local Plan. More specifically, the minutes state “it was deemed necessary to engage alternative consultants to undertake the Strategic Housing Market Assessment (this was to ensure that the Assessment included specialist assistance to cover ‘the London factor’ and produce a robust evidence base for the Local Plan)”.

That budget monitoring report detailed that the relevant budget was £50,500 but the actual cost was expected to be £110,000 a £59,500 overspend, as a result of changing consultants to include specialist assistance to ensure that ‘the London factor’ was fully reflected in the SHMA and thence into the OAN of 9,400.

The parish council would very much appreciate an explanation of exactly:

- what ‘the London factor’ is;
- what that specialist assistance was;
- why it was so important as to necessitate a late change of consultant and
- the impact that it had on the final OAN of 9,400 houses.

We would greatly appreciate further information on these last points.

3.2 Other documentation, the validity of which has been challenged elsewhere

The parish council notes that some documentation, notably the HELAA 2016 site assessments and the Green Belt Assessment Part 2, remain the subject of technical challenge as to their validity for the purpose and possibility that they do not meet Government requirements. The parish council is unable to comment technically but expresses the hope that you will ensure that they are fit for purpose so that there will be no further delay in the planning process and a new Local Plan can be put in place in accordance with the current delayed timetable.

4. General Comment

The parish council feels the need to reiterate that although it is aware that the construction of a Local Plan is a complex matter, it has to note that publishing 88 documents comprised of almost 7,000 pages (actually 6,883) does not make the task of commenting an easy one for lay people. It does make life difficult and desperately time consuming to the extent that there can be little doubt that only a tiny proportion of the residents will have been able to take the time to access, read and understand the documents fully. This in turn, must cast some doubt as to the full effectiveness of the consultation process. The parish council also specifically hopes that the next stage of consultation will include full details of the infrastructure needs and deliver plans so that the Plan may be viewed as a whole, rather more fully, and more easily, than at present.

Thank you for including our submission in your consideration. The parish council would appreciate an acknowledgement of your receipt of its comments and their inclusion in your consideration.

Yours faithfully,

Michelle Richards

Clerk to Chelsham and Farleigh Parish Council