



## **TLAG ('Tandridge Lane Action Group') Response to Garden Village consultation**

TLAG was set up to campaign against Tandridge District Council's (TDC) proposals for a Garden Village in the area – **which in reality is a large 4-5,000 house town the size of Oxted** - and which is planned at one of four rural sites in the district. Any of the proposals would impact our way of life, but two of these are immediately on our doorstep, at South Godstone and Blindley Heath.

If either of these schemes went ahead there would be negative consequences for us all. Not just those unfortunate enough to live adjacent to what would become an enormous housing estate and who would suffer from a huge loss of amenity, loss of wildlife & ecology, ruined views, noise and light pollution etc, but **ALL** of us due to the huge amount of traffic this would generate on all roads in the area, most of which are minor roads (8000-10,000 additional cars). And not to mention the impact on infrastructure and local services.

**Our aim is to raise awareness of the issues and ask you to write in to TDC to object to the proposals before the consultation deadline of 9<sup>th</sup> October.**

TDC have made the consultation process difficult by hiding certain documents deep on their website. They have also set up the questionnaire in such a way to lead you to the response they desire – which is that the concept of a garden village becomes accepted e.g. you are really only asked to comment on the details of how it would work and the merits of the four shortlisted sites. This is wrong and we suggest that you instead write an email or a letter and say that there is another way, which is to have no garden village at all as it is simply not needed.

It is very important that when responding you argue for the retention of the Green Belt and object to the **principle** of a garden village anywhere in Tandridge district. Otherwise, TDC will assume that the principle of a garden village is agreed and one of the 4 sites **will** get nominated. This is the approach also being taken by others objecting including OLRG (Oxted and Limpsfield Residents Group), Godstone Parish Council and Blindley Heath Residents Group.

**This leaflet is designed to give you all the key facts that you need to refer to in your written or emailed response, both in opposing the overall concept and also about defending the land at South Godstone and Blindley Heath. Please read it and then put pen to paper!**

**And please do not think that you don't have to do anything or leave other people to respond - every response counts and we must all make an effort to defend our Green Belt and our rural community and way of life. Ideally, we would like a letter from every adult, not just one per household.**

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## **KEY ARGUMENTS AGAINST THE GARDEN VILLAGE CONCEPT**

The **key** issues that we believe should be highlighted in each response are as follows:

- TDC have not consulted properly on the strategy for a garden village – they are imposing this on us and simply want comments on the 4 sites, not whether the principle of a garden village is acceptable. A garden village was quietly raised as one of 7 options in a consultation last year, but nothing of this scale was proposed at that time. The Council then adopted this strategy earlier this year without further or proper public consultation. **We oppose the strategy of having a Garden Village (a large housing estate).**

- The TDC suggested need for 9,400 (OAN calculated) new homes over the 20 year plan period from 2013-2033 is flawed. TDC have said that this is the number of homes Government have told them to build. This is not true and the figure is largely based on over development in the district over the past 10 years, which does not have to continue, especially with our Green Belt constraints. TDC can choose to say NO and have a different 'Delivery Target' but they have chosen not to. The 9400 figure does not reflect just local need (which we accept must be met), it is predominantly to cater for inward migration for new residents from outside the district, which would make up about 90% of this number. **We are opposed to giving up the Green Belt for inward migration.**
- Another reason TDC wants to build so many homes is to help support its own finances as it receives money from Government for every new home built. In 2016/17 such income equated to 20% of its overall income. This is not a legitimate justification in planning terms. **We oppose development that supplements District Council income.**
- TDC state that a development of this scale will reduce house prices and make property more affordable in the district. This will not happen. Apart from the affordable housing that the developers will be obliged to provide (at 80% of market value) and market housing will be built and sold at a rate that makes large profits for the developers and which maintains or increases price levels. **We oppose TDC making unsubstantiated claims on house prices in order to 'sell' the Garden Village concept.**
- TDC say they are proposing to release just 1% of our Green Belt and are trying to justify the development in this way. That may be true at a district wide level, but it will have a disproportionately horrendous effect on any area where a garden village is located. **We oppose the release of Green Belt land for unsubstantiated development.**
- There is very little employment in Tandridge District, the vast majority of people leave the district to work. This garden village / new town would simply become a commuter settlement, adding huge amounts of further car journeys onto the road network and extra load onto the already stressed train network and station car parks which are already at capacity. **We consider that the requirement of sustainability cannot be met with the development of a Garden Village, not least because there is no commitment to infrastructure development, including roads, rail, car parking and broadband, which are all outside of the District Council's responsibility.**
- For the release of Green Belt to go ahead, TDC would need to justify development on the Green Belt. Government guidance in the form of the NPPF (National Planning Policy Framework) says that this should only be allowed if 'very exceptional circumstances' can be demonstrated. **We consider that TDC have not demonstrated very exceptional circumstance in their proposal for a garden village and therefore oppose the proposal in all locations.**
- Furthermore, TDC have also said in their leaflets and other published material that they are "...committed to protecting the Green Belt and only amending the Green Belt boundary in locations where its purposes are not served, where community benefit is evident and where exceptional circumstances are demonstrated". **We believe that these very exceptional circumstances do not exist and the Green Belt IS serving its purpose.**
- In addition, central Government guidance in the form of a White Paper issued in February 2017 titled '**Fixing our Broken Housing Market**' effectively says that despite the overwhelming national need to deliver more housing, and housing that is more affordable, Green Belt status remains very important and one of their statements says "...maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements". **We consider that TDC have not demonstrated such exceptional circumstances at all.**
- Furthermore, the same paper says that brownfield land should be prioritised – indeed, the paper says "...the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary...". **We consider that the district has sufficient brownfield sites to meet the OAN over the designated period, in addition to parishes nominating specific sites for development through their Neighbourhood Plans.**
- The Campaign for Rural England (CPRE) stated earlier this year that "CPRE welcomes efforts to tackle the housing crisis in the form of high quality, well-planned and well-located developments. Done well with genuine local

*consent, garden villages and garden towns can be part of the solution and certainly preferable to what is currently happening in too many parts of the country – poor quality new estates plonked down on the edge of villages and market towns, in the teeth of local opposition and in defiance of good planning principles”. **We would say that the latter applies here, with TDC singularly failing to get local buy in.***

- If you would like more detail on how these plans do not meet Government planning guidance visit the Godstone Parish Council website and their excellent analysis of the position - <http://www.godstonepc.org.uk/local-news/39-godstone-parish-council-response-to-the-local-plan-sites-consultation>
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## **REASONS NOT TO ALLOCATE SOUTH GODSTONE OR BLINDLEY HEATH**

### Infrastructure – roads and rail

Development at either site would lead to huge amounts of extra traffic onto an already congested road network. Promised improvements to the A22 and an upgrade of Jn6 of the M25 (if delivered) might help, but we believe that the overall impact will still be significant. Much of this extra traffic will also use Tandridge Lane, which the developers promoting both sites clearly show as an important link into their schemes. Tandridge Lane is already a busy, dangerous road and cannot cope with this amount of extra traffic. There is a pinch point at the railway bridge and only two years ago TDC themselves refused planning permission for a development of just two houses on highways safety grounds close to where a new access is now proposed and which would be used by hundreds of cars!

Surrey County Council have undertaken a preliminary highways assessment for TDC but this is based on the wrong number of houses (only 2000) so it hopelessly underestimates the number of trips and it takes no account of access points. It also clearly says that Tandridge Lane would be adversely affected and that all sites will increase traffic on rural lanes which may not be suitable without mitigation. Even they accept that this will be detrimental.

TDC and the developers want you to believe that having a train station at South Godstone makes the proposals sustainable as it offers an option for commuters, who can walk to the station. However, this is a minor east to west branch line and not a line that many commuters use; they will travel from Oxted, Hurst Green or Lingfield instead and add to an already hopelessly crowded service. Statistics obtained from the developers and The Office of Rail and Road (ORR) show that only 25,000 people travel to London from Godstone via Redhill a year whereas the combined equivalent number from Hurst Green, Lingfield and Oxted is approximately 954,000, 38 times higher than Godstone.

And a recent survey carried out for the Tandridge Parish Neighbourhood Plan showed that of 121 responses, only 2 people used the train from Godstone – all others use the stations mentioned above, even if Godstone was closer to where they lived. **Godstone station is not therefore a viable option and will not be well used.**

### Schools and health facilities

Even if the developers do provide new schools and health facilities, it is questionable whether Surrey County Council has any funds to run new schools or whether the NHS has funds for new surgeries. The NHS cannot even fill existing empty GP posts in Oxted, let alone recruit for a whole new surgery.

### Landscape & woodland

The land at South Godstone is not developed upon at all, other than a small collection of farm buildings, and is currently attractive, unspoilt open countryside. Development would lead to the loss of land that provides a valuable amenity for local residents. The area is used daily by hikers, dog walkers and horse riders and there is nowhere else

locally that is this accessible or safe to walk upon. **This amenity risks being lost forever.** Other impacts would include several areas of ancient woodland being cut off and becoming isolated and surrounded by development.

### Ecology

Development would lead to a significant loss of wildlife habitat, which would, in turn, affect much of our native species, some of which are declining in numbers and are protected, such as bats, butterflies, bees, great crested newts, skylarks, deer, water voles, hedgehogs to name but a few. Not forgetting the destruction of many wild flowers and other plant life on which much of this wildlife is dependent.

### Heritage & archaeology

We could lose important archaeological history if this development goes ahead. The Grade II listed Lagham Manor and its moat are protected and will remain untouched by development, but the Park Pale, a medieval deer park enclosure, which is recorded as 'an area of high archaeological potential' could be destroyed and part of our local history lost forever. Fortunately, Lagham Manor represents a significant constraint to development, as a report commissioned by TDC itself, clearly states (see Concept areas for new and extended settlements October 2016). The archaeological importance of the area has also been highlighted with the recent discovery of a large Roman site nearby and the western side of Tandridge Lane is believed to be the route of an old Roman road.

### Flood risk

Parts of the land at Blindley Heath sit in a flood plain and are not suitable for residential development.

### Employment

Tandridge is largely a rural community with limited employment opportunities. Consequently, there will be very few jobs created within these developments and so most people will commute out, making them highly unsustainable. As a result, there will be a significant increase in car journeys and also extra pressure put on the already very congested train lines from Uckfield and East Grinstead to London. In short, any of the proposed garden village sites would become commuter towns only, with a consequent high impact on the already over-stretched transport infrastructure. Projections by the developer of c. 3400 jobs being created at South Godstone are clearly a nonsense.

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**PLEASE MAKE SURE YOU SEND IN YOUR RESPONSE BY 9<sup>TH</sup> OCTOBER. YOU CAN DO THIS IN VARIOUS WAYS:**

**By email:** [localplan@tandridge.gov.uk](mailto:localplan@tandridge.gov.uk)

**By letter:** write to Planning Policy, Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey, RH8 0BT

**By using the TDC portal:** <http://consult.tandridge.gov.uk/portal>

**If you use this last option, please make sure that you state you object to the whole concept of a garden village**

**If you would like help writing your response to the consultation please email us at [admin@TLAG.org.uk](mailto:admin@TLAG.org.uk) and we will do what we can to assist. We can also provide a Word version of this document so you can use the bits you may want to put in your own response. You can also visit our website at [www.TLAG.org.uk](http://www.TLAG.org.uk)**

Thank you from TLAG