Dear Mr Lewis,

TANDRIDGE LOCAL PLAN 2033 Examination – MATTER 7 EMPLOYMENT LAND ALLOCATION – SES04

This letter is submitted on behalf of SORE (Save Oxted’s Roads and Environment). SORE was formed in 2015 specifically to oppose TDC Planning Application 2015/1217. The application involved erection of a super-depot and ancillary buildings for DPD on the Westerham Road Tileworks site at Moorhouse which is owned by the Titsey Foundation.

SORE has the support of approaching 200 households and local organisations. SORE, and the constituents it represents, remain opposed to any inappropriate development at the Moorhouse site which would harm the local environment to the detriment of present and future generations.

SORE opposes the release of the Westerham Road Industrial Estate, SES04 from the Green Belt for the following reasons:

SES04 is a unique location as the only Strategic Employment site in Tandridge District that is located in both the GB and AONB.

1. The proposals are not consistent with the National Planning Policy Framework (NPPF).

1.1 NPPF 2012 (paragraphs 83 and 88) states that GB boundaries should only be altered in ‘exceptional circumstances’. Exceptional circumstances do not exist.

1.2 NFFP 2012 (paragraph 84) requires the need to promote sustainable development. This site is remote, rural with totally inadequate public transport.

1.3 NPPF 2019 (paragraph 138) requires the impact of removing the site from the GB to be offset by compensating improvements to the environmental quality and accessibility of the remaining GB land which policy SES04 clearly doesn’t provide.

1.4 NPPF 2012 (paragraph 115) states “Great weight should be given to conserving and enhancing the landscape and scenic beauty of ….the AONB”. This is ignored in the TDC proposal for SES04.

1.5 Policy SES04 Clause iv states that the regeneration, enhancement and development of this site should be “sensitive to its location within the Surrey Hills AONB”. If the site it truly strategic how can it at the same time be sensitive to the AONB? Another item of conflict.
2. Present planning safeguards have worked

2.1 Present planning safeguards (TDC’s policy CSP20 and 21, Surrey Hills AONB Management Plan LU1, LU2, and LU3, and NPPF para 172) have successfully constrained inappropriate development. For example, the application for an asphalt plant (mid 1980s) went to appeal and more recently the DPD was turned down.

2.2 It is important to note that it is not the site alone that requires protection. Surrey Hills AONB Management Plan LU5 specifically states that “Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted”.

2.3 Existing safeguards for both the GB and AONB have allowed appropriate development that preserves the landscape and scenic beauty of the AONB. There have been as many as 17 approvals of various sizes since 1990. These approvals have created no lasting harm to the openness of the GB, in accordance with NPPF.

2.4 Removal of SES04 from the GB will without doubt encourage applications for unsuitable development.

3. Is extending industrial land in Tandridge Necessary?
The need for additional B8 and other industrial land is unproven with conflicting statements from studies commissioned by TDC (AECON versus G L Hearn) and takes no account of economic uncertainties.

3.1 The need for additional industrial land has been vastly overstated. AECON’s Economic Needs Assessment (ENA) 2015 page xiii indicated an over-supply of B2/B8 industrial land, and further that demand for such would in fact decrease in the plan period.

3.2 The increase in demand for new housing and industrial sites in the GB has been based on research that uses a perception of very significant inwards migration (Experian 2015 and 2017). Experian’s Inward Migration assumptions are based on a ‘want’ of people who live elsewhere to live in another area, rather than a ‘need’, and certainly not a commitment to relocate. This is neither rigorous, nor scientific. The reports have also been embargoed to the general public thus preventing proper scrutiny of the methods of research, data used and the quality of its analysis.

3.3 Experian’s questionable Inwards Migration estimate would lead to the need for a substantial upgrade of the local infrastructure. In reality the Local Plan consists of a ‘wish list’ of projects which have no financial support. Indeed, both Capital 2 Coast and SCC have indicated a lack of funds for this. Knowing full well that big infrastructure investment is very unlikely in this part of the south east, the Experian work should be qualified accordingly, and it makes their predictions questionable.

3.4 GL Hearn ENA 2013 (paragraph 2.36) admits that economic forecasts at district level are ‘subject to considerable error’. It goes on in para 2.38 to state that there has been a loss of major employers at local level in recent years.

3.5 GL Hearn ENA 2017 (paragraph 1.15) indicates the need for small industrial units of 500 to 1000 sq. feet. This does not justify the release of a significant industrial site from the GB but rather a tight control of future planning applications. Such activity is better suited within existing commercial sites that are not designated rather than at SES04.
4. Assessment of the Site does not support removal from the Green Belt

4.1 In the Green Belt Assessment (Part 3): Appendix 1 (2018) the site is assessed under reference ENA 8 -Westermham Road Industrial Estate. At present it is used for open storage and it sits within the Surrey Hills AONB and is part of the Green Belt and is close to SSSI woodland.

4.2 The Assessment offers little evidence to justify removal from the GB, in fact the Assessment gives good reasons for its retention.

4.2.1 It recognises "the potential for harm to the ability of the wider Green Belt to meet the Green Belt purposes if employment use of the site were intensified.” And removing the site from the GB and its constraints will of course intensify employment development.

4.2.2 The Assessment says “..the site would potentially be suitable for limited development… but would need to demonstrate no adverse impacts on the setting of the existing landscape ..”.

4.2.3 The Assessment admits “..it would be difficult to mitigate effects on the AONB...

4.2.4 It recognises the site as being isolated and in a remote location.

4.3 Overall the Assessment is suggesting all of these environmental problems concerning potential development of the site can be overcome but will need careful control and monitoring. It is therefore a mystery why the conclusion is to remove it from the GB and the controls which pertain to such a designation. Does the Council, having listed the site as being a strategic employment location, now find its protected status inconvenient?

4.4 This Assessment in ENA 8 has been carried out recently at a time when the site’s surroundings are somewhat compromised by the present Moorhouse mineral and associated workings. But at some time, this will all be fully restored and landscaped as far as possible to original countryside. So in future all this adjacent AONB & GB ecologically and environmentally designated countryside will require compliant protection from any development within the site. To do this it must retain its GB status so that any potential development is rigorously controlled.

5. Recent Government Guidance on preserving biodiversity and wider environmental net gain

The Government’s guidance ‘Natural Environment’ (paragraphs 020 to 028) sets out the importance of biodiversity and wider environmental net gain. Any development must leave the natural environment in a measurably better state than it was before designation. This site is adjacent to ecologically sensitive SSSI woodland and sits within a wider Area of Outstanding Natural Beauty of Regional and National importance.

6. Conclusion

Based upon the above arguments SORE’s response to the Inspector’s questions on SES04 Matter 7 (paras 7.14 to 7.19) is as follows:

6.1 Para 7.14: There are no ‘exceptional circumstances’ (NPPF 2012 paragraphs 83 and 88) that justify the release of the site from the GB, quite the reverse.
6.2 Para 7.15: NPPF 2012 (paragraph 84) requires the Local Planning Authority to ensure consistency, “for meeting identified requirements for sustainable development”. SES04 is both remote and unsustainable.

6.3 Para 7.16: The allocation would have the real potential for creating a major development within the AONB. Further, removal of SES04 from the GB would do nothing to enhance the scenic beauty of the Surrey Hills and could encourage encroachment.

6.4 Para 7.17: NPPF 2012 (paragraph 24) in dealing with ‘out of centre proposals’ states, “preference should be given to sites that are well connected to the town centre”. SES04 is remote, rural and lacking in public transport rendering it unsustainable.

6.5 Para 7.18: The Infrastructure Delivery Plan is not an examined document as it is not within the Local Plan. Therefore, the requirements for financial contributions are not consistent with national policy.

6.6 Para 7.19: The modifications do not address the problems of soundness.

Due to the unique location of SES04 we urge you to reject the proposals put forward in the Local Plan 2033 which are totally contrary to both National and Local Planning Policy and as such this proposal fundamentally challenges the soundness of the Local Plan.

Yours sincerely,

Donald Payne
On behalf of SORE