OLRG Response to the Inspector led post hearing consultation on TDC document TED17 Housing Yields October 2019

Thank you for the opportunity to take part in this consultation. Document TED17 reinforces the position set out in our earlier submissions.

We believe the Council’s work on infrastructure requirements for the original housing yields is inadequate. There is little evidence of what is needed or of what mechanisms have been put in place to ensure necessary infrastructure will be provided.

Increasing the yields simply makes the position even more inadequate. We note that no additional work on infrastructure provision which is needed to accompany the increased site yields, has been carried out.

As acknowledged by the Council, there is already a large existing infrastructure deficit in Tandridge District which has built up over years. In addition, the Plan is inward migration led which places immediate and greater pressure on the existing exhausted infrastructure. The implications of this have not been identified nor have they been incorporated into the plan-making process.

With regard to education provision, during the Examination hearings it was accepted that there is already a deficit in the Hurst Green area. It is inconsistent that Hurst Green site HSG13 is included in TED17 for housing development given that the Council’s stated aim is to safeguard the site for a school to meet identified education needs. We note that the hearing statement from CBRE Ashill (joint developer and landowner with the education authority Surrey County Council) is promoting a figure of 80 units on this site which would further exacerbate the education deficit.

As well as housing development, Policy HSG13 references a “Strategic Opportunity” for an all through primary school. A site cannot be used for two purposes.

Paragraph 1 of TED17 references “Note for the Inspector – Housing Land Supply” (TED14). This note lists site UCS09, 43 East Hill Oxted (part of TLP29) for a housing development of 50 units. The site is the Morrisons supermarket car park which is the main supermarket serving a wide area including Oxted, Hurst Green, and Limpsfield and is an important community asset. Underneath the supermarket car park is another car park run by Network Rail. We believe this is an unrealistic and undeliverable allocation as explained at the Examination hearing Day 6 (7 November afternoon).

Our Councillors have recently confirmed (email 23 December 2018) with the Council’s acting chief executive that there is no minuted meeting where this item was discussed by the Council with the site owners/operators. We believe development of this site has never been discussed by the Council with Morrisons.

In addition to the points made at the Examination hearing, we note that the BNP Paribas Viability Assessment (INF15, page 118) states that this site is unviable.