10 January 2020

Dear Chris,

Tandridge Local Plan – INSPECTOR LED POST HEARING CONSULTATION ON TDC DOCUMENT TED23 EDUCATION NOTE DECEMBER 2019

I write in response to your invitation for further comments from Hurst Green and Warlingham Matter 6 participants on the above document.

As you are aware, I represented Village Developments and Oxted Shareholders Group throughout the hearing sessions and attended the Matter 6 sessions. My clients have ownership of a number of omission sites across the district against which representations and matters statements have been submitted throughout the examination process.

Document TED23 sets out the proposed location of a primary school within the Warlingham area at site HSG15. Indeed, the council themselves told the inspector at the hearing sessions that the provision of school facilities formed an essential part of the exceptional circumstances required to justify the release of this site from the Green Belt. This is set out within paragraphs 6.76.4 and 6.76.5 of the Council’s matter 6 statement (TED10) which state that:

6.76.4 This site has been identified as being able to contribute towards benefits above and beyond any needed to off-set impacts associated with its development, including wider community benefits such as the opportunity for expansion and re-location of local education provision and improved sports provision.

6.76.5 Together these factors are considered to represent the exceptional circumstances needed to justify the release of this site from the Green Belt.

The position of the council in relation to education provision at this site is in direct contradiction to the position of the promoters of the site as set out in their matter 6
statement (REP-1182645-001). This sets out their comments in regard to the education provision on this site which clearly states at paragraph 2.25:

Our main objection relates to the requirement of a school in this location as TDC have not demonstrated the need for the relocation and expansion of the Warlingham Village Primary School, nor would the proposed number of houses on this site increase demand for primary school places to a point where the provision of additional school places would be required. Neither TDC nor SCC have provided any evidence which looks specifically at the preferred location for the school.

There is no basis for TDC to claim that our client’s site is the best site for the possible relocation and expansion of the school.

The subsequent paragraphs of their matters statement point towards significant objection over the evidence supporting the need for relocation or expansion of the school in addition to severe ambiguity in the approach from TDC and SCC in this regard. Again, this is in direct contradiction to the position of the Council within TED23 which states the council has actively engaged with Surrey County Council as the education commissioner for school places in Tandridge (SDTC6).

It is submitted that the evidence placed in front of the inspector as part of the examination process has a significant level of ambiguity over the demand and rational for the relocation or expansion of school facilities in Warlingham. Given the high degree of uncertainty in this matter, and the reliance on these to form part of the exceptional circumstances for the release of site HSG15 from the green belt, it is considered that the continued allocation of site HSG15 cannot be supported by the council.

Unless clear and compelling evidence can be provided by the council in this matter it is considered that the allocation of this site must be removed in order for the Local Plan to pass the tests of soundness in this regard.

Yours Sincerely

Andrew Black

07775 912 653
andrew@andrewblackconsulting.co.uk