

Dormansland

Guidelines for comments

Tandridge District Council

Our Local Plan 2033

Regulation 19 Consultation

Documents online or paper copies in Lingfield Library

<https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Draft-Local-Plan>



Introduction

This is your final chance to make comments on this plan; anything that you have said before, and that you want to bring to the attention of the Planning Inspector examining the plan, you will have to say again.

Use as much or as little of these guidelines as you wish, copy and paste or put in your own words but please try to make some comments as the Examiner reads them all.

The consultation closes at 5pm on Monday 10th September.

Where to send your comments is at the end of these guidelines.

At examination the Planning Inspector will pass or fail the Plan on whether it is in conformity with the relevant planning legislation and whether it has been put together properly. Ideally your comments need to try to identify where the Plan has not met these criteria. It isn't too difficult to reword your previous concerns to fit these criteria as this is the best way to give your comments more weight, but any valid concerns can be raised.

The Plan will be examined on the **4 Tests of Soundness**.

1. Is it Positively prepared?

Is the plan based on facts? The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements but must be consistent with achieving sustainable development (that is balancing protection of the environment and green belt with the infrastructure required and jobs available locally).

2. Is it Justified?

The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Is the garden community option at South Godstone going to work? Do we really need to build all these houses when all it does is attract people in from Croydon and South London to the new houses which can offer more value for their money, when compared with the prices in London or Croydon?

3. Is it Effective?

The plan should be deliverable by 2033. The garden community doesn't even have all the land signed up by the developers and without any confirmation from Network Rail that the station is going to be upgraded, the sustainable form of transport is not guaranteed. Even if the station was improved, there is no spare capacity on the lines to accommodate additional trains through East Croydon. Is the infrastructure promised in the Infrastructure Delivery Plan realistic? Is it deliverable? It is certainly ambitious in its scope but the key infrastructure requirements like the M25/A22 interchange improvements, flood protection in Caterham, the upgrade to the station at Godstone are all very unlikely to be paid for by the 1,400 houses to be built first at South Godstone. The costs of the new schools and medical centre in the new settlement haven't even been included.

4. Legal compliance

Is the plan consistent with national policy? It should deliver sustainable development but even if the garden community is built, how can the council ensure the infrastructure will be delivered? Where are the people who buy all these houses going to work? The proposals to improve employment opportunities are undeliverable (Hobbs Barracks Industrial Estate for example has such poor road links to be able to provide more jobs). The houses are going to be too expensive for people who work in the main employment in the district to afford (Education, care and retail) so they will be bought by people with jobs outside the district. Already more than 60% people who travel to work outside of the district go by car, because the trains are full. The roads will not take the additional traffic and improvements to the M25/A22 Junction 6 are so expensive and disruptive, they are undeliverable.

Has the Council engaged properly with the local community, especially in letting everyone know how important this final consultation is? Have they taken any notice of the engagement?

The key issues in the draft local plan that are going to change Dormansland

Densities.

The wording in the draft plan indicates Dormansland can accommodate many more houses.

Policy TLP08: Rural Settlements (page 60 of “Our Local Plan”)

Dormansland is categorized as a Tier 3 Settlement and the following development will be permitted:

- *Development in Rural settlements within the Green Belt as shown on the Policies Map, will be permitted where the proposal comprises:*
 -
 - ***The partial or complete redevelopment of previously developed land, even if this goes beyond the strict definition of infilling;***
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- *In all circumstances, including for Woldingham which is inset from the Green Belt, infilling, redevelopment and other forms of development must be in character with the settlement, or that part of it, and will be subject to any other relevant Development Plan policies.*

This policy retains the wording of the Detailed Policies (2014) offering some protections to the character of Dormansland but it allows for much higher concentrations of housing.

This policy (TLP08) does not specify the ideal housing densities.

Currently the Core Strategy (2008) sets out the density targets for Dormansland village

*“to be within the range of **30 to 40 dwellings per hectare**, however in certain circumstances **it may be appropriate to build a lower density** because a density within the range may have an adverse impact on the character of particular parts of the village”*

There is no similar protection in the Local Plan 2033.

The Urban Capacity Study has identified areas of Dormansland which could deliver more housing by increasing the densities. The shading on the map which is beige is for “medium density” housing. The pale green is “medium-low”



From <https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Evidence%20base%20and%20technical%20studies/Urban-Capacity-Study-App-E-2017.pdf>

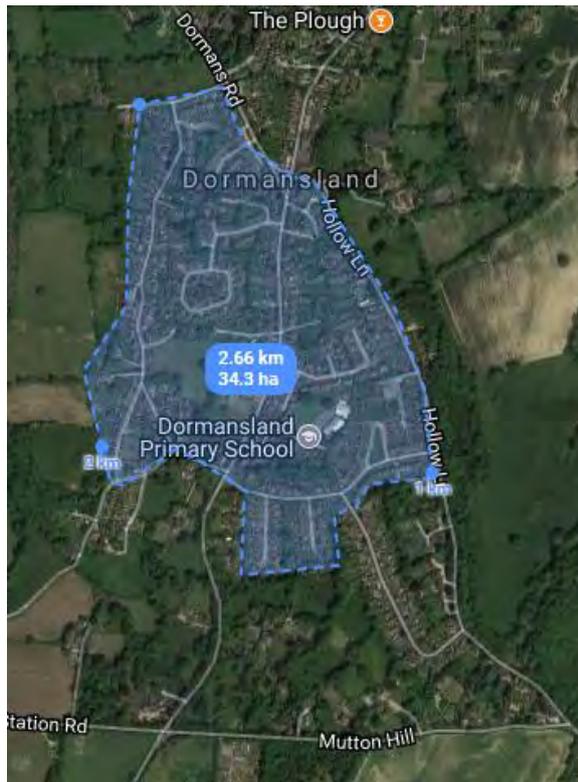
When compared with the existing protection provided by the limits of the current Core Strategy, you can see more houses will be allowed. The National Planning legislation tells councils try not to allow permission for developments less than the maximum densities. The developers are going to want to maximise their profits and put as many houses into each application as possible.

The key identifies two areas in the village as having the potential for the following densities

	Current density max	Baseline (minimum) density	Optimised Density
3 medium density 	30 – 40 but lower where it impacts character	20 - 50	60 - 75
4 medium-low density 	30 - 40 but lower where it impacts character	10 - 20	45

Housing densities in numbers of dwellings per hectare. 1 hectare = 2.47 acres

The area shaded at grade 3 (beige) on the Urban Capacity map is roughly an area of 34 hectares. It is shown as the blue area on the map below.



If it is redeveloped, it will be along the lines of the housing on Town Hill in Lingfield, which is now Little Stanfords Close and Forge Close. There were 3 houses with reasonably large gardens and there are now 45 dwellings, including two blocks of flats. These 3 houses have been redeveloped to a density of about 65 per hectare.

- Currently the blue shaded area has about **700 houses**.
- At **50** per hectare this number could increase to **1,700 houses**
- at **75** houses per hectare it could increase to **2,500 houses**.

Not everyone will want to sell their houses because their neighbours have, so there will still be areas where the character is retained, but the character of any development is to be in line with what is around it. There are already “town houses” at the Old dairy site and the old school site.

As this type of development is small scale and piecemeal, it rarely delivers any large sums of developer contributions and for some types of housing, like retirement, first time buyers and “affordable” housing, the developer doesn’t have to pay the Community Infrastructure Levy (CIL). The 60 houses allocated for Lingfield do not trigger any request for funding for either the primary school or the doctor’s surgery to accommodate the extra residents.

The Infrastructure Delivery Plan doesn’t set out how it is going to fund the infrastructure that a potential doubling or trebling of the population of Dormansland will need and

therefore is not compliant with the national policy that the development must be “sustainable”, not just access to work but also access to the appropriate infrastructure.

Another fact which makes the proposal to allow infilling is the failure of the Local Plan to allocate land or provide the information about the cost of the land for the enlarged school which will be needed. Dormansland Primary School has already had a reduction of land area when the two former schools were merged onto one site in Clifton Hill. There is physically not the space to expand the school and if it were to have an additional storey put on it, there is not enough play space outside for the children to play at the same time.

Rural Exception Affordable Housing

There is a national policy that allows local councils to allocate “affordable” housing in the countryside around existing settlements, even if it is green belt. Lingfield has 2 schemes, The Baytrees and Hazels Close with 38 social rented houses together. So long as it is physically adjacent to the village boundary, Dormansland could have these types of houses now but the new Local Plan proposes to allow these schemes to be put around Dormans Park as well. There does not seem to be a limit on the number of proposals, the only limit is that they can be up to 20 houses per site and up to 2 of these can be full price market housing. If there is an identifiable need for these houses, for either people on the housing waiting list or for local workers who are in low paid jobs and the appropriate housing needs survey is completed to show this, the development will be supported.

Dormans Park is not a sustainable location for additional housing and especially not for families on low incomes who may not have access to a car or afford train fares to work. Therefore, this is not compliant with the national legislation for sustainable development.

The other problem of not having a limit on the numbers of these sites, is they do not provide revenue, including CIL, which is needed to provide the school and surgery places they will need, especially if the residents are being brought in as new staff for the major employment centres in the parish, like Young Epilepsy, Lingfield College or Lingfield Park resort.

The garden community at South Godstone

The proposal to locate up to 4,000 houses in a purpose built “community” is unsound. Not only is it undeliverable, because the land is not even allocated or guaranteed, the houses won’t get started until 2026 at the earliest and this puts the garden community concept at risk of the planning inspector rejecting it at examination as undeliverable, unsound and unsustainable. The most likely result will be the inspector tells TDC to go away and find more sites in ALL the settlements to deliver the housing. Dormansland has not been allocated any sites in this version of the local plan but there

are several sites adjacent to the village boundary which could be used (West Street, Farindons, the site adjacent to the Beacon) and have already been offered to TDC for housing sites. If the site in Lingfield is deemed acceptable and it is more than 60% inside the Conservation Area, then the criteria are easily met for the Dormansland sites to be released from the green belt. The flooding issue on the West Street site was not enough to refuse the planning application as the developers are able to engineer solutions which are acceptable to the planning officers.

Please send your comments to

Email localplan@tandridge.gov.uk

Or post/deliver to **Local Plan Council Offices Station Road East Oxted RH8 0BT**

Make sure your comments are in by

5pm Monday 10th September