

The response of Whyteleafe Village Council to the Tandridge District Council Local Plan 'Sites Consultation' (Regulation 18).

Whyteleafe Parish Council has reviewed this consultation and after a meeting of its Councillors on 12th December 2016 has the following comments:

Q1. The Sites - do you agree with the Council's consideration of a site and, if not, why not?

Firstly, the Council wishes to reiterate its comments about the value of **Green Belt** to Whyteleafe as expressed in the Issues and Approaches consultation as follows:

- we strongly oppose any proposal to allow development on Green Belt as infill
- we strongly oppose any proposal to consider development on Green Belt around Whyteleafe (refs GBA 002, 004, 007 and 008) and fully support the retention of strategic Green Belt to separate settlements (including London sprawl) and areas of high landscape value such as the North Downs Ridge.

Overall, we are pleased to see that this Sites Consultation reflects the views of Whyteleafe Village Council in that, to a large extent, any consideration of sites in the Green Belt has been ruled out. That said, three areas remain cause for concern to the Council as follows:

The **Burntwood Lane (CAT 029)** assessment states that this site '*may be subject to an exceptional circumstances test on the basis of other evidence base considerations*'. The Council is alarmed to see this caveat as this site has already been earmarked by Whyteleafe Village Council and the Neighbourhood Plan Steering Group to be designated as a Local Green Space. The justification is based around its function to separate settlements, provide a green corridor (connecting other valuable green spaces) and to remain an important buffer to adjacent areas of ecological value (ancient woodland) and landscape value. On this basis, we feel there are no 'exceptional circumstances' to allow this site to be considered further for development.

This raises the point that TDC's Local Plan process should defer to Neighbourhood Plans and here is an example where local knowledge can, and should, legitimately come to bear on TDC's Local Plan considerations.

CAT 004 - Former Officers Mess, Kenley Aerodrome (which is adjacent to Whyteleafe Parish) where the Green Belt assessment and other evidence rules this site out for further consideration.

No mention is made (as far as we can see) of the flood risk associated with this site and we are understandably concerned about this in the context of recent flooding in Whyteleafe (2014/15). In your consultation pre-amble, you state under 1.28 "The Council is well aware of the flooding issues with the district and the Local Plan must

ensure that any development planned for, has borne flooding in mind and any effect it may have..."

We agree that this site should be ruled out for further development but not only for the reasons stated in the assessment so far. This site sits above Whyteleafe and as such the topography would cause surface water to run-off into the centre of Whyteleafe which is already classified as an area of high flood risk potential (both surface and groundwater flooding). Flooding of Whyteleafe School and the prolonged closure of the A22 are evidence of this.

Land at Torwood Farm, Whyteleafe (WHY010) has been ruled out and we agree with both the justification and outcome. Once again, there are flood issues for this site but just as importantly is its role in separating settlements and buffering other areas of ecological importance. Finally, there is landscape value as open land in a Parish where a mix of land use is so important to preserve.

As you know from the earlier consultation, we believe that the Local Plan vision should be that each settlement will be a place with green and open spaces. These spaces need to be throughout a Parish/ settlement and within short distances of roads and houses.

In respect of **Godstone Road Car Park (WAR 032)** the Council recognises current discussions about the potential use of this site for Council Housing. As the Housing Officers involved in this proposal will be aware, the Village Council is determined that the development of this site should not be at the net loss of car parking availability in this part of Whyteleafe.

Councillors have expressed concern about the burden any development will place on local infrastructure. In addition to this, any development would need to complement the sustainability of the economic area and the appearance of the street scene. Ideally, the Village Council would wish to see any development of this site as part of a wider 'town' centre strategy for Whyteleafe to ensure a vibrant mix of commercial and residential land (as described in the Council's response to Approach 4 Town Centres/ Retail and Leisure Planning Policies - Issues and Approaches consultation).

There is also doubt over some of the ratings given in the sustainability appraisal for this site e.g. Flood Risk, Water Quality, Air Quality and Contaminated Land. All these aspects would require thorough assessment prior to any proposal to develop.

In respect of **Edgworth Close (WAR 016)** the Village Council once again has doubts over the robustness of the sustainability appraisal for this site (e.g. identical scores to WAR 032).

This site raises a number of potential issues previously flagged by the Council in terms of development:

- protect public recreational space
- improve the standard of design and materials for new housing

- make provision of land for local community use e.g. buildings
- alleviate the pressure on on-street parking around transport hubs
- carefully consider higher densities where they do not currently exist
- avoid creating development whereby the built environment could become too urban in appearance (and nature) which is uncharacteristic for the District.

In addition, the Council wishes to reserve judgement on this site until more is known.

Q2. The locations for a new and extended settlement - do you agree that the areas set out should be considered as a location for a new or extended settlement and, if not, why not?

The Council has no comment to make in respect of Q.2 other than any subsequent proposal to extend the settlement of Whyteleafe would be heavily opposed.

Q3. Other areas - are there any other areas in the district that the Council should consider for its suitability as a location for a new or extended settlement?

The Council has no new comment to make other than the reply given in the earlier Issues and Approaches consultation in that a new settlement would help meet future housing need and is more likely to include adequate climate change mitigation and infrastructure. There appears to be merit in considering a new settlement in the south of the District in proximity to existing employment sites.

Additional comments

- it's important to ensure housing of differing densities within all areas across the District and within each settlement.
- the approach for Whyteleafe is to avoid exceeding already high densities (in some parts of the Parish) and avoiding an urban landscape to the detriment of the community and therefore the District overall
- the strain on infrastructure which is, at times, overburdened is concerning to this Council and an Infrastructure Plan must be prepared and put forward as part of the Local Plan process as a matter of urgency. The assessment of a site must be made in the context of infrastructure adequacy for a period of, at least, 20 years. The Council would wish to see an Infrastructure Plan as a major part of the next iteration of the Local Plan process.
- The causes and effects of the 2014/15 flooding in Whyteleafe have not been considered at the forefront of any site assessment even though roads were closed and homes flooded. A flood mitigation strategy for Whyteleafe is a priority before any further development can be considered with the Local Plan.

Comments in respect of this consultation process

- many of the assessments appear to have been completed without reference to each other which may have a fundamental impact on the suitability of a site for development. These separate assessments need to be brought together so that it is made clearer as to whether a site should be ruled in or out for further consideration.
- the timing of this consultation around Christmas may mean that many residents will struggle to assess and respond in time or at all. A true (and clear) eight week period at another time of the year may have been more appropriate.
- the consultation involves many detailed supporting documents which is an enormous undertaking to review. A simpler process would have been helpful maybe with a guide to navigating information, the significance of each document to the Local Plan and more summaries to enable readers to understand information and its whereabouts more quickly.

Simon Bold

Clerk

For and on behalf of Whyteleafe Village Council

19 December 2016