

Local Plan Consultation  
Strategy Team  
Tandridge District Council  
Council Offices  
8 Station Road East  
OXTED  
Surrey  
RH8 0BT

c/o Warlingham Community Library  
Shelton Avenue  
Warlingham  
Surrey  
CR6 9NF

9 September 2018

Dear Tandridge District Council,

### **“OUR LOCAL PLAN: 2033 REGULATION 19” CONSULTATION**

Warlingham Parish Council (‘the Council’) has considered the Our Local Plan document and supporting documentation issued by Tandridge District Council (TDC), and wishes to make comment as below. We note the request to relate comments to “soundness” and have therefore largely limited our comments to state where we believe the draft Plan is unsound or can be made more sound. The comments are individually referenced to the specific pages and policies.

#### **1) Planning Policies**

- *Page 32, Spatial Objective SO6:* the objective should be expanded to include village centres as well as town centres. Warlingham is generally described as a village and the Council believes it is vital that planning policy supports the vibrancy of the centre of Warlingham just as much as it supports that of the centres of Caterham and Oxted. It strengthens the soundness of the Plan to do this as TDC economic development policies relate to the whole of the District not just Caterham and Oxted.
- *Page 33, Objective SO11:* this objective is poorly and confusingly worded, for example using the phrase “previously developed land” twice. It also promotes the over development of land by the use of the words “fully utilised” and “optimised densities”, in conflict with the Council’s agreed policy to support “appropriate densities”, as stated throughout the rest of the document. The following replacement wording would therefore improve the Plan’s soundness: “To ensure that previously developed land is well utilised, with a focus on appropriate densities”.
- *Page 38, TLP01 Spatial Strategy:* the Council considers that there is a disproportionate number of homes allocated to Warlingham, with 400 of the total 768 allocated in the Urban Settlements. Warlingham is smaller than Oxted and Caterham and yet is being asked to take over 50% of the total allocation to the urban settlement sites and to expand its population by well over 10%. Has the impact on Warlingham’s limited road and transport infrastructure been fully assessed? Whereas Oxted and Caterham have major roads running through or adjacent to them, stations and numerous bus routes,

Warlingham has no 'A' road, no station in the parish and a limited bus service. Have the excluded Oxted and Caterham sites been fairly assessed according to the same criteria as the allocated sites in Warlingham, and been given higher scores for green belt and landscape impact assessments? Because Warlingham has some large sports ground sites that are co-located and will deliver greater numbers of homes, has the easy option of allocating these rather than a larger number of smaller sites in other places been taken? In addition, one of the allocated Warlingham sites – the John Fisher sports ground – has not been subject to public consultation. For all these reasons the Council questions whether the number of homes allocated to Warlingham as against the other urban Tier 1 settlements is a fair and sound apportionment.

- *Page 72, TLP12 Affordable Housing:* the Council is dismayed at the reduction in the affordable housing requirement from 34 to 20 per cent for sites in the urban settlements, whilst pleased to see the increase in the requirement to 40% elsewhere. It does not believe this can be sound in view of the overwhelming need for affordable housing in the South East illustrated by the size of Tandridge's housing waiting list. It accepts that 34/40 % may not be viable on a few sites, but believes that – as at present – developers should be required to prove this. Affordable housing is particularly required in urban areas such as Warlingham where there are the facilities to support less well-off residents. The Council is also concerned that the existing policy that prevents separate assessment of adjacent sites to avoid providing any affordable housing appears to have been removed. This cannot be sound and it ask that this be restored.
- *Page 92, TLP19 Densities:* the Council is very concerned that development takes place at densities appropriate to the area concerned and therefore asks that the wording of the existing policy CSP19 on Density be retained in TLP19. This is that "The Council [TDC] will resist densities that would harm the character of the area". In addition, an important element affecting the number of homes that a site can accommodate is parking, and therefore there should be an additional clause in this policy stating that development should provide sufficient parking in line with the Council's parking standards. The addition of these clauses will make this policy more consistent with the rest of the Plan and supporting policies and therefore more sound.
- *Page 181, TLP25 Retail Frontages- Primary Shopping Frontages:* the 50% requirement for Retail use in Local Centres such as Warlingham is no longer realistic or sound, as demonstrated by the latest calculation that the percentage in Warlingham is only 32%. Other uses can sustain the vitality and viability of a local centre and should not be obstructed by an artificial and outdated policy. Therefore, this policy should be amended by the addition of the following clause: "Where a proposal would result in the proportion of A1 frontage falling below the required percentage, permission will be granted where it can be demonstrated that the proposed use would make a positive contribution to the viability and vitality of the centre".
- *Page 217/8, TLP40 Burial Space:* the draft policy as worded ignores the important role that graveyards play in providing burial space and the importance of meeting the need

for burials and interments close to where people live. It would therefore be made more sound by adding the words “or graveyards” at the end of the first sentence, and by inserting the words “or Local” after “District” in sub clause i. Also, sub clause ii should be amended to require that Local non-Green Belt sites should have been explored first where the application is to provide or extend a local/parish burial facility.

- *Page 275, Replaced Policies:* for clarity and greater soundness, the specific clauses in Detailed Policy DP7 that are being replaced should be stated. These, of course, are those relating to trees and soft landscaping.

## **2) Specific Sites in the parish of Warlingham**

*HSG15: Land West of Limpsfield Road:* the Council is pleased to note that its request that any development on this site be screened by a green strip along the frontage by Limpsfield Road has been accepted. It is very concerned at the substantial loss of sports pitches and would like the condition that these be provided elsewhere strengthened to ensure they are provided in the Warlingham area, with the unnecessary caveat removed. There are obvious sites available for this provision. The building of a new primary school here is supported, but should this not go ahead, the land made available should be used for another community purpose not for additional housing.

Given the loss of sports facilities here, the need for an indoor Sports Hall noted in the Infrastructure Delivery Plan should be specifically required to be met at this site, or at the Shelton Sports site.

The Council is not convinced of the need for traffic calming in Hillbury Road and asks that this requirement be removed.

We request that the site description be amended to state that the John Fisher sports ground is well used (unlike the Greenacres and Shelton Sports sites).

These changes will make HSG15 sounder.

*HSG16: Land at Green Hill Lane/Alexandra Avenue:* the Council questions the need for Extra Care Accommodation at this site: it is not aware of the need locally and indeed there is strong feeling in Warlingham against the amount of sheltered accommodation which has been built in the parish in recent years. It asks that the local need for this be proved.

There is no playground facility at this end of Warlingham with the nearest equipment being at Mint Walk Recreation Ground which is over the TDC target of a 10-minute walk away. Therefore, the provision of this should be required at this site.

The proposed requirement for “congestion alleviation at Sunnybank” is not understood and should be removed.

*HG17: Land at Farleigh Road:* the Council strongly opposes the allocation of this site which it believes to be unsound for the following reasons. It contributes materially to the Green Belt purposes. It is attractive countryside in an AGLV – the lovely Crewes Valley - and as well as safeguarding the countryside from encroachment it helps stop the merging of two major areas of ribbon development – that along Farleigh Road and that along Limpsfield Road. Development here would be highly detrimental to the character of the wider landscape and visual amenity, especially as a well-used public footpath crosses the site and it is prominent and visible from the rear of houses all around. As noted in the official assessment it is also highly susceptible to flooding. Access would also be problematic, as the site is currently only accessed by a narrow track and would need a major upgrade.

In addition, the suggested allocation of 50 units is far too high and this density would be much greater than the adjoining areas of housing. The proposal for Sunnybank Congestion alleviation is queried, as above. The proposed Youth Play Space should be provided at Mint Walk Recreation Ground not on this site, should it be developed.

*HSG18: Shelton Sports:* as above the proposal to install traffic calming in Hillbury Road is questioned.

*Sites not allocated:* the Council strongly supports the decision not to allocate the following sites: WAR008 land north of Greenhill Lane, WAR018 Kennel Farm, WAR025 Land at Farm Road, WAR029 West of Farleigh Road, WAR035 Galloway Lodge and WAR038 Land at Westhall Road.

In particular it wishes to reiterate the disastrous impact that building on the land north of Green Hill Lane would have, as this land strongly fulfils the main Green Belt purposes of preventing urban sprawl, stopping adjacent settlements merging and safeguarding the countryside, and development here would have a major detrimental impact on the landscape, environment and setting of Warlingham. Also building on Land at Westhall Road would have a hugely detrimental impact on the character and setting of the centre of Warlingham

### **3) Other Matters**

The move of Warlingham Village Primary School to the Limpsfield Road site will leave a significant site in Farleigh Road available for housing. This should be recognised in the Plan with the appropriate number of homes for the site added to the total number of homes the Plan will deliver. This will improve the Plan's consistency and soundness.

The Infrastructure Delivery Plan rightly includes the project to Improve Warlingham Green. Financial provisions towards this should be required from all the sites allocated, with the caveat that the project still has to be finalised and approved.

As noted above, the Council believes that the traffic calming in Hillbury Road and congestion alleviation at Sunnybank should be removed from the Infrastructure Plan.

The Council is very pleased that the existing Detailed Policies have been retained, to the extent that this is appropriate.

The Council would like to be represented at the Public Enquiry on the Local Plan in order to ensure that the substantial impact on Warlingham of development on both allocated and unallocated sites is properly understood.

The Council is grateful for the opportunity to comment at this critical stage in the development of the Local Plan and trusts that its views will be given due consideration.

Yours sincerely

Simon Bold, Clerk  
For and on behalf of Warlingham Parish Council

*Note:  
sent by letter and submitted via email using [localplan@tandridge.gov.uk](mailto:localplan@tandridge.gov.uk)*