

Response to the Surrey 2050: Place Ambition consultation
(additional text, as per the amendment moved by Councillor Blackwell, is underlined)

Thank you for consulting with Tandridge District Council on the draft Surrey 2050: Place Ambition. We welcome the continued engagement and involvement in the Place Ambition and the joint working which is taking place with other authorities, across Surrey.

Due to the strategic significance of the Place Ambition, our final response will be considered and agreed by the Council's Planning Policy Committee at its meeting on 10 March 2022. However, given your consultation deadline of 4 March 2022, we felt it would be helpful to share what we will be presenting to the Committee in advance of its meeting. A final response will be sent to you following the meeting on 10 March.

1. The Council welcomes the joined-up approach to recognising how various local and countywide plans and strategies should work to shape the County as a whole. The Place Ambition looks across boundaries and to promote a long term, co-ordinated and cross boundary approach to planning and managing the impacts of growth. In general terms, the principles regarding what the document is seeking to achieve are supported.
2. It is agreed that whilst Surrey is an important contributor to the United Kingdom's economy, there is a significant need to address the existing and future infrastructure deficit which places constraint on investment opportunities and development potential. Although the Place Ambition seeks to provide the necessary partnership framework for this to be achieved it is not felt that this goes far enough.

The Council feel that there would be merit in reinforcing the importance and need for a more robust approach from Surrey County Council as the infrastructure provider and next tier authority, to more proactively exercise its duty to cooperate with regard to Local Plans and other strategies from areas bordering Tandridge and wider Surrey authorities. This will ensure residents are not adversely impacted by large developments on our borders which put extra strain on an already exhausted infrastructure. This action by Surrey is necessary if the four strategic priorities of the Place Ambition are to be achieved.

While it is recognised that the Place Ambition is not a Surrey County Council document, but that of the Surrey Futures, the significance of County as the accountable authority for key infrastructure, must be highlighted, together with the need for its actual delivery. Tandridge's infrastructure networks and our communities, have been particularly impacted by the plans of neighbouring authorities and support from Surrey County council is essential if positive outcomes are to be achieved and inappropriate and detrimental development avoided. Recent examples where more proactive action from Surrey County Council would have been beneficial include:

- I. Mid Sussex District Council Site Allocations Development Plan Document, which does not take account of the traffic impacts on the A22/A264 Felbridge Junction from allocations SA19 (200 houses south of Crawley Down Road) and SA20 (550 houses Imberhorne Farm). The Felbridge junction A22/A264 is a known issue to the Surrey County Council, and while the County Council are seeking to commission necessary studies on the corridor, earlier action and more active resistance to the Mid Sussex DPD at the preparatory stage would have been more effective.

- II. The Regulation 19 consultation on the review of the Croydon Local Plan which proposes intensification of development on sites near the border of Tandridge/Surrey but which does not take account of the impacts on existing flooding problems in the north of Tandridge or on Tandridge infrastructure such as the road network including the A22, junction 6 of the M25 and the B269 through Warlingham.

The impacts of the London Plan and the plans of greater London authorities are acutely felt by Tandridge and Surrey and this is significant to the Place Ambition and what it seeks to achieve. It is crucial that the Place Ambition captures the need for Surrey County Council to be more proactive in championing the needs and challenges for authorities such as Tandridge, if 'good growth' is to be secured. As such, it is requested that the significant role of Surrey County Council in defending against negative impacts of London, is included in the Place Ambition and how non-action can act as a hindrance to success.

3. For the eight Strategic Opportunity Areas (SOAs) across Surrey to be effective there must be a clear recognition of the need for investment in new strategic infrastructure and to address existing infrastructure deficiencies and improve connectivity both within Surrey and between other strategically important economic areas. This is most acutely felt by the residents and businesses of Tandridge which, unlike the more western districts and boroughs, have not benefitted from investment through government funding such as Housing Infrastructure Funds, nor large scale developer contributions, due to the more limited levels of development which reflects the rural nature of the district and the 94% green belt, designation.

To date, the authors of the Place Ambition have sought to assist the Council in trying to reflect the challenging position of its emerging Local Plan. Wording for SOA8 has previously been revised to ensure that there is an emphatic reference to the need for infrastructure improvements, regardless of whether the Council's Local Plan progresses or not. Further to this, while matters around the Local Plan remain uncertain, the Council request that the wording of SO8 be further revised to emphasise the need for infrastructure upgrades and that improvements to the A22 (south and north), the A264 Felbridge Junction, junction 6 of the M25 and the A25 in the west and east of Tandridge are required regardless of any Local Plan outcome in order to deal with the existing traffic problems, poor air quality and high carbon emissions. Without any emerging plans for Network Rail to upgrade lines and the continued challenges at the Windmill Junction in East Croydon, it can be assumed that cars will continue to be the main method of travel for the foreseeable futures and an over reliance on modal shift to more sustainable methods of travel and public transport is not helpful. The Council are open to discussions as to whether this would warrant a change to the mapping of SO8 to better follow the transport corridors, than as currently depicted.

4. The Council feel that it would be a positive step to emphasise the definition of 'good growth' with the understanding that 'growth' doesn't only come from development, but as something that relates to community betterment and infrastructure delivery. While it is understood that development and funding often go hand-in-hand, this is considered to be short sighted and actually 'good growth' can also come from infrastructure delivery, funded independently of house building and schemes of community betterment such as green space, which benefit our communities. This view was shared by both developers and authorities at the Surrey Developer Forum conference, in December 2021, where it was felt housebuilding has become a singular focus for growth, yet the holistic importance of planning and good growth should be about benefitting an area in a balanced way, not just about building houses.

5. Good growth” is a key feature running throughout the Place Ambition. However, this needs to recognise the rural nature of Tandridge, which is 94% green belt and the limitations this places on growth. There is a lack of detailed analysis for the difference in character, localism, transport, road networks, business opportunities and development limitations across the county between different boroughs and districts with focus being placed on Surrey as a whole. Although mentioned as a fact, little importance appears to have been given to the significance of the areas in the AONB. The document also makes no mention of the impact of the AONB review on the potential for development and growth. The Place Ambition has a predominant urban and built-form focus, there is little regard for rural areas and how the Place Ambition can cater/recognise their needs. As such, it is suggested that a rural section be included.
6. The county is already densely populated (as referenced in the report under “Surrey Facts and Figures”) and congested. Little weight appears to have been given to the Government’s intention of levelling up to address these issues where it intends to focus economic growth, infrastructure, funding and development into areas away from the South East to where it is needed. The Place Ambition appears to be at odds with this agenda. In addition, the report does not properly address the importance of mitigating climate change, implementing the new Environment Act, or producing a green infrastructure plan.
7. Despite the Place Ambition highlighting infrastructure improvements, there is little reference to the significance of flooding either as a general point, or in the action plans for the SOAs. With an increasing emphasis on climate change mitigation, increasing extreme weather events and increased housing development that may not be properly off-set in terms of infrastructure; flooding is a drain on resources and causes much distress for communities and businesses across the County. Further recognition of the need for suitable and effective flood mitigation should be included.

In conclusion

Once again, the Council thanks Surrey Futures for consulting with us. As set out, while the purpose of the document is supported and is a positive step towards cross boundary strategic planning, the fundamental concern relates to the challenges around infrastructure. For Tandridge, our district and its residents have been underprovided for, for a significant period. Good Growth for the district is that which must be underpinned by guaranteed new and improved infrastructure of all types, only then is the option of future development something that can be looked on favourably. We hope that our comments are of assistance and that the severity of situation, faced by districts and boroughs such as Tandridge, can be properly captured and further emphasised in the next iteration of the Surrey 2050: Place Ambition.