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**From:** OLRG [REDACTED]  
**Sent:** 26 October 2018 15:08  
**To:** comaps; Lesley Westphal  
**Subject:** Moorhouse Tileworks planning application 2018/1792  
**Attachments:** Moorhouse objection.pdf

Dear Ms Westphal


Please find attached comments from the Oxted & Limpsfield Residents Group on the Moorhouse Tileworks planning application 2018/1792.

Yours sincerely

Catherine Sayer

## Oxted & Limpsfield Residents

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26 October 2018

Dear Ms Westphal

Re: planning application no 2018/1792.

We write to object to this proposed development on the grounds that it would cause significant harm to the Green Belt and to the Surrey Hills Area of Outstanding Natural Beauty (AONB).

Also, it would generate unacceptable levels of increased traffic and pollution, potentially harmful to public health, in an area already suffering considerable problems with congestion and air pollution from the A25 and the M25. Further, the added congestion will damage the local economy.

### **1. Green Belt/AONB**

1.1 The application follows the refusal of a similar application in 2015 (2015/1217) and the withdrawal of a similar application in 2016 (2016/1036). The proposed building is similar in size to that in the previous applications and the reasons for refusal remain valid. The proposal is inappropriate development in the Green Belt/AONB because of the mass, bulk and height of the proposed building which is much greater than the current structures it would replace.

1.2 The development would have an urbanising effect on the AONB. The proposal represents a substantial (roughly a third) increase in building volume. It would harm the openness of the landscape and would be wholly out of character with the AONB. The applicant's Landscape and Visual Impact Assessment shows that the development cannot be hidden and will be visible from the North Downs, including from well used recreational routes and important viewpoints.

1.3 The design includes external lighting of the much larger building, entrances and car parks consistent with a 24 hour urban industrial site rather than a site located in an AONB. This will cause further harm to the character of the AONB and the local and wider character of the countryside.

1.4 The application repeats much of the very special circumstances case contained in the two previous applications. This case has already been found to be insufficient to clearly outweigh the harm to the Green Belt and there are no changes to this current application to alter that conclusion. Since those previous applications, NPPF 2 has been published which states at Paragraph 144 that:

*144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

1.5. As well as being in the Green Belt, the site is in the AONB. NPPF 2 gives AONBs the highest status of protection with Paragraph 172 stating that in AONBs "Great weight should be given to conserving and enhancing landscape and scenic beauty..."

1.6 The evidence and policies for the new Tandridge Local Plan (2013 – 2033) have not been examined by the Planning Inspectorate and so they should not be given weight. The Green Belt Assessment for Moorhouse, together with the assessments for many other parts of Tandridge District, has not been carried out in accordance with national Green Belt policy or with recognised planning case law and therefore should not be relied on.

## **2. Employment**

2.1 With regard to economic very special circumstances, as the applicant explains at Paragraph 5.54 of their Planning Statement, the nearest "hot spots" for recruitment are East Grinstead, Crawley, Redhill and Croydon. None of these towns is in Tandridge District and the development would create minimal jobs for local people.

2.2 The site is in an isolated and unsustainable location and, because of the poor public transport, employees would have to commute to it by car or van. Providing vehicle based employment in the Green Belt/AONB for those living outside of Tandridge District who would need to commute to work by car is contrary to national planning policy for sustainable development and for the Green Belt and AONB. We believe there are no economic very special circumstances to clearly outweigh the harm to the Green Belt that would result from the development. It should also be noted that the Council's economic proposal put forward in its draft Local Plan is not a relevant planning consideration because it has not been examined or found sound.

## **3. Traffic**

3.1 The proposal would generate very substantial and unacceptable levels of extra traffic along the A25. The A25 already suffers from congestion, particularly on the regular occasions when there are problems on the M25 and traffic is diverted off the motorway on to the A25.

3.2 The proposal would result in extra air and noise pollution in an area already suffering significant air pollution from the A25 and M25 with consequent potential damage to public health. The level of extra traffic would increase congestion and so deter people from visiting local businesses thereby damaging the local economy.

3.3 There are question marks over the reliability and completeness of the traffic evidence which indicate that the traffic impact of the proposal has been considerably underestimated.

3.4 Despite the fact that the distribution centre is the same size as in the previous applications, it is stated that the number of postcodes being served by it are much reduced. This is surprising. However, if permission is granted, we understand that DPD will be able to increase the size of the area served, and the number of parcels handled, at any time in response to market demand.

3.5 DPD's business is expanding at a rapid rate and the predictions and potential for growth contained into the application appear underplayed. There are questions too over the number of parcels assumed to be carried in each van which appear higher than expected thereby reducing the estimate for the number of vans on the roads.

## **4. Conclusion**

4.1 In summary, having considered the new proposal, we believe it constitutes inappropriate development in the Green Belt. In addition, it would cause harm to the character of the Surrey Hills AONB.

4.2 There is further harm in that the increased level of traffic will affect the health and well-being of local communities and increase existing road congestion on the A25 and local rural roads. This will deter customers from visiting local businesses and so adversely affect local businesses, disrupting and harming the local economy.

4.3 There are insufficient very special circumstances to clearly outweigh the considerable harm resulting from this proposal and therefore the application should be refused.

Yours sincerely

Catherine Sayer  
Oxted & Limpsfield Residents Group