

NUTFIELD PARK - RESPONSE TO OBJECTIONS

This tabulated response seeks to respond to common topics raised throughout public comments received since the application was validated on 20 October 2024 as well as those raised by the Nutfield Parish Council within its response dated 4 January 2024.

This table should be read alongside the accompanying highways response prepared by Vectos part of SLR and two letters prepared by fpcr in response to comments from the Surrey Wildlife Trust and Naturespace.

Objection Topic	Specific Comments	Our Response
Greenbelt	<ul style="list-style-type: none">• Inappropriate Development• Encouragement of urban sprawl• Openness - impact on Surrey Hills Area of Outstanding Natural Beauty	<p>The site is located within the Green Belt, as such there is a presumption against development unless very special circumstances (VSC), in accordance with paragraph 153 (previously paragraph 148) of the NPPF 2023, can be demonstrated. Irrespective of the NPPF 2023 and protection of the Green Belt, this Planning Application demonstrates the stark need of housing and affordable housing, amongst other benefits (see table below), which weighs in favour of granting planning permission.</p> <p>We believe our scheme is at the appropriate scale to both meet some of the wider needs of the district and provide benefits to existing community which will not be forthcoming without some development. The site can still maintain the green belt purposes and retain the character of the village of Nutfield.</p> <p>The details of the proposed Nutfield Green Park scheme and the planning balance assessment set out in Section 8 of the Planning Statement (pages 48-50), prepared by hgh Consulting, demonstrates that the harm to the Green Belt as a consequence of the development would be clearly outweighed by the weight of the benefits of the scheme such that 'very special circumstances' can be demonstrated.</p>

A summary of the benefits and weight to be attributed to these considerations are set out below:

Benefits	Weighting
The provision of much needed market housing	Very substantial weight
The provision of much needed affordable housing	Very substantial weight
The provision of later living, adaptable and care home beds (Class C2)	Very substantial weight
The provision of 5% self-build / custom build homes	Substantial weight
The provision of +22.39% BNG on site	Significant weight
Economic, social and community benefits associated with both construction and completion phases.	Moderate weight

A Landscape and Visual Appraisal & Green Belt Assessment has been prepared by fpcr to accompany the application.

For the “encouragement of urban sprawl” comment, please refer to pages 45 and 46 of the submitted Assessment. The Assessment concludes the scheme would have no effect on the purpose of checking the unrestricted sprawl of large built-up areas.

The impact on Surrey Hills Area of Outstanding Natural Beauty (AONB) is assessed within the fpcr Assessment. On page 38 the Assessment concludes there is very limited potential intervisibility between the AONB and the areas of the proposed built development within the Site. Overall, the impact is considered to be negligible.

Highways	<ul style="list-style-type: none"> • Site Access concerns • Lack of public transport • Inadequate Assessment • Increase Traffic • Lack of a good travel plan • Car parking concerns • Unattractive road for pedestrians and cyclists to walk or ride at any time, particularly during darkness, given significant areas of open land between the three areas. 	<p>A detailed drawing of a proposed new junction on A25 has been prepared by Vectos part of SLR, in consultation with Surrey County Council (SCC) Highways, and was submitted in support of the application (see Drawing Title: Copenhagen Crossing Style Junction; Drawing No: SK-CH-005). The supporting Transport Statement considers the proposed access to the site to be safe and deliverable.</p> <p>The existing public transport facilities are set out on pages 11-13 of the Transport Assessment.</p> <p>A Transport Assessment has been prepared by Vectos part SLR, with a sufficient level of detail for the outline application stage which seeks approval for access arrangements. The Assessment has also been informed by pre-application discussions with SCC Highways officers. Please refer to Appendix A of the Transport Assessment for details of the formal pre-application engagement. The highway proposals as set out in the Assessment have addressed the comments raised in the pre-application response.</p> <p>Regarding traffic comments, please refer to Section 6 “Impact Assessment on the Transport Network”, which sets out the traffic surveys and assessments of the local area.</p> <p>A Framework Travel Plan has been prepared by Vectos part SLR. The Travel Plan sets out sufficient levels of detail at this outline planning application stage, including the overarching strategy for each aspect of the development including the residential and commercial occupiers.</p> <p>Pages 30 and 31 of the Transport Assessment sets out the proposed parking will be compliant with SCC minimum parking standards for residential, later living and care home uses. Details of parking will be provided at the reserved matters application stage.</p>
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Ecology	<ul style="list-style-type: none"> • Impact natural environment • Loss of ecological value • Loss of biodiversity - Increase footfall across the site, introduce cycling and running routes - reduced habitat for recreational purposes. • High level of predicted car ownership is exceeded of average with Tandridge DC - pollution negatively impact biodiversity. 	<p>An Ecological Impact Assessment (EclA) has been prepared by fpcr, which includes ecological survey results undertaken by the fpcr team across the site in relation to badgers, breeding birds, bats, dormice, great crested newts, invertebrates, reptiles (refer to Appendices D-K). The Assessment concludes with a combination of intrinsic mitigation, targeted mitigation, compensation and ecological enhancement as detailed within the EclA (including the use of 51.8ha of the site for opportunities for habitat creation, including species-rich meadow grassland, mixed shrubs, woodlands and wetland habitat, and protections of mature trees and RPAs, new hedgerow planting a tree planting, SuDS basins and swales to enhancement blue/green corridors) demonstrates that the proposals will lead to short term, but not significant adverse effects on lowland mixed deciduous woodlands, hedgerows, badgers, birds, other broadleaved woodlands, other mixed woodlands, scrub and other neutral grassland habitat. However, in the medium- to long-term, Negligible to Not Significant positive effects are anticipated for all important ecological features.</p> <p>Overall, there will be biodiversity net gain of 22.39% over the Site. This percentage has increased slightly (from 22.22%) following a slight reassessment in response to the Surrey Wildlife Trust’s comments, please refer to the accompanying response from fpcr.</p> <p>The proposed development includes some enhancement works to existing foot paths and cycle paths. If, as a result of these enhancement work, it encourages increased use of the path and cycleways, the footfall and use would be restricted to the built pathways. Access off the pathways into open areas of land or woodland/shrubland is not encouraged as part of the proposed development. Therefore, the increased activity of the path and cycleways will not impact the biodiversity of the Site.</p>

- Risk to Great Crested Newts and Brown Hairstreak Butterfly
 - Destroying protected species
 - Located within Holmesdale Biodiversity Opportunity Area
 - Construction works - impact on biodiversity.
 - No guarantee of biodiversity gains in the long term.
- The proposed car parking standards will be policy compliant and to be secured at the reserved matters stage. The use and parking of vehicles will be restricted to the southern part of the Site in the location of the proposed built development. As shown by the illustrative masterplan and parameter plans, no vehicular access or internal roads are proposed in the central and northern part of the site. Subsequently, the retained biodiversity will not be adversely impacted by the vehicles associated with the development.
- Regarding risk to Great Crested Newts (GCN) the survey (Appendix I), found they were only present within the pond to the north of the Site which is significantly over 250m from the development proposals. Therefore, there will be no direct effects to this species.
- An Invertebrate Survey (Appendix J), undertaken by entomological consultant Mark G. Telfer, did not find the presence of a Brown Hairstreak Butterfly on site. In the event that there was evidence of a Brown Hairstreak butterfly, the BNG sought to be created on site will ensure that potential future habitats are protected and enhanced.
- A Construction and Environmental Management Plan (CEMP) will be provided to provide a range of best practice working measures to reduce the scale of impacts associated with the construction phase can be secured by condition as part of the planning permission that will set out management measures during the construction phase, ensuring the Site's retained biodiversity is protected.
- As part of the Reserved Matters (RM) application, a Habitat Management and Monitoring Plan will be provided to detail how additional habitats will be created and how retained habitats will be enhanced. This will also include an Ecological Mitigation Enhancement Plan which will include prescriptions to deliver the specific faunal features as well as providing other measures deemed appropriate such as the provision of interpretation boards to inform residents of the sites value for biodiversity. The delivery of this HMMP and associated EMEP will be secured through a planning condition once permission is granted.
- The applicant will be required to deliver 22.39% biodiversity net gain on the Site, which will be conditioned and set out in the S.106 Legal Agreement as necessary, guaranteeing biodiversity gains in the long term.

Natural England has provided their consultee response, and raised no objections and recommended a number of planning conditions should planning permission be granted to secure a Habitat Management and Monitoring Plan by condition.

Separate responses to both comments received by Surrey Wildlife Trust and NatureSpace are provided by fpcr.

Flooding and Drainage	<ul style="list-style-type: none"> • Increase in flooding • Drainage concerns • No robust assessment for reducing significant areas of woodland and replacing with hard landscaping. 	<p>A Flood Risk Assessment and Drainage Strategy has been prepared by Watermans. The Assessment concludes the risk of flooding to the proposed development is low and surface water flood risk will not be affected by the proposed development. Additionally, the risk of flooding from groundwater, sewers and artificial sources have all been assessed and are not considered to require further mitigation.</p> <p>Section 4 sets out details of the flood risk assessment.</p> <p>Section 5 sets out surface water drainage strategy.</p> <p>The proposed drainage strategy will be sufficient to manage any risk from surface water (page 29).</p> <p>The Lead Local Flood Authority has provided their consultee response, and they are satisfied with the proposed drainage scheme raising no objections and recommends a number of planning conditions should planning permission be granted.</p>
Engagement	<ul style="list-style-type: none"> • Poor pre consultation and local engagement • No engagement with local traffic action group 	<p>The Statement of Community, prepared by Lexington, sets out the program of pre-application consultation with the local community and ensures as broad an audience as possible was engaged. The consultation incorporated both physical and digital elements which are further detailed in Section 3 of the Statement.</p> <p>Numerous attempts were made to meet with the Parish Council prior to the submission of the application and post-submission, but the Parish have been unwilling to engage in discussions at either stage. Regular attempts have since been made with no response.</p>

783 letters were sent out to residents, businesses, and community groups to notify interested parties of the consultation event and the opportunity to discuss the scheme with members of the technical team. The application submission has also been widely reported, providing any interested parties with the opportunity to come forward.

The consultation website (<https://futureoftandridge.co.uk/>) has been populated with scheme updates and works notifications in/around the site both prior to and post application submission. This has been followed up with a 'myth-busting' paper (clarifying key components of the scheme, benefits, mitigation, and differentiation to the refused 2021 Masterplan application) and a separate survey & technical work response which was sent to Nutfield and South Nutfield residents and posted on the website.

The applicant and technical team would still welcome post submission discussions with the Parish Council to discuss mutually beneficial outcomes that could be delivered as part of the scheme proposals to the benefit of both existing residents and future residents of the development.

Neighbouring Amenity	<ul style="list-style-type: none"> • Result in overlooking into properties • Reduction in privacy • Construction impact • Construction traffic impact • Air quality • Noise, dust, light and fumes impacts • Pollutant concentrations within Godstone and Redhill Air Quality 	<p>The proposed development parcels are located away from existing properties in Nutfield and will not result in overlooking or a material loss of privacy for the existing residents of Nutfield. The topography of the site and density of existing tree coverage and hedge planting around the site boundary further contributes to minimise any opportunity for overlooking. The detailed layout of the site is a matter for Reserved Matters Stage.</p> <p>A Construction Management Plan will be prepared at reserved matters application stage, setting out management strategies for the construction phase and measures to minimise impact on the surrounding area.</p> <p>An Air Quality Assessment has been prepared by AQ Consultants and a Planning Noise Assessment has been prepared by Noise Solutions confirming the Site is appropriate for residential development.</p> <p>Additionally, the Environmental Health Officer has raised no concerns or objection to the proposed development in relation to air and noise quality. A condition has been</p>
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	Management Area already exceed guidelines.	<p>recommended should planning permission be granted, relating to the implementation of noise mitigation measures for the proposed residential dwellings.</p> <p>A Construction Management Plan will be prepared at the reserved matters planning application stage, which will manage and mitigate the associated air quality, dust, noise and fumes impact.</p> <p>The Site is not located within an Air Quality Management Area (AQMA). Redhill AQMA is the nearest AQMA, which is set out in Figure 1, page 4, of the Air Quality Assessment in relation to the Site.</p>
Landfill Site		<p>Please refer to pages 5-6 of the Planning Statement, prepared by hgh Consulting which provides a description of the Site. The site is not currently a landfill site. The remains of the former Laporte Works lie to the south and relate to the Site's historic use as a minerals and landfill site, which was subsequently restored to its current state. The operational mineral extraction largely ceased in the 1950s with some works ongoing on part of the Site, to the west, up to 1986 (38 years ago). The Site was decommissioned in 1997 (27 years ago).</p> <p>SCC Minerals and Waste Planning Authority has provided their consultee response, and raised no objections and recommended a number of planning conditions should planning permission be granted.</p>
Inappropriate site and Sustainability concerns	<ul style="list-style-type: none"> • No local services • Lack of social infrastructure • A25 at overcapacity • No sufficient School • Hospital (East Surrey) cannot cope • Public transport 	<p>A Social Infrastructure Assessment prepared by Turley, assesses the proposed development impact on the demand for and capacity of social infrastructure and community facilities. The following types of social infrastructure are considered in the Assessment: education facilities, healthcare facilities, open space and sports facilities, other types of community facilities.</p> <p>The assessment concludes that the new infrastructure provision sought through the creation of flexible floorspace (to provide healthcare and / or community convenience store) to be provided on-site, in combination with capacity in existing infrastructure provision locally, is sufficient to meet the demands of the Proposed Development in full.</p>

	<ul style="list-style-type: none"> • Car dependent location 	<p>The existing public transport facilities are set out on pages 11-13 of the Transport Assessment.</p> <p>The majority of the site's proposed areas of the development are within 400m, or a 5-minute walk, of existing bus stops. Furthermore, all of the developable areas are within 600m, equating to a 7-minute walk, as shown in Figure 5 of the Transport Assessment. This is deemed an acceptable walk distance for a development of this nature within this rural locality.</p> <p>Additionally, as specified in the Transport Assessment (page 30) attitudes towards private vehicle use and associated car parking requirements are likely to change over the delivery horizon of Nutfield Green Park. Whilst these changes are expected to take a number of forms, both behavioural changes towards car sharing and use of on-demand services, and technological advances including more electric vehicles, future automation and Mobility-as-a Service, the precise nature of some of these changes is less certain.</p> <p>A summary of all highway improvements and benefits are also enclosed within a separate note.</p>
Character of Site and Surrounding Area	<ul style="list-style-type: none"> • Impacting village characteristics • Impact views of northern escarpment of the Lower greensand ridge and from North Downs, Merstham, Mercers Country Park 	<p>The siting of the proposed built development has been carefully considered using the topography of the site and woodland screening to minimise the visual impact.</p> <p>The Design and Access Statement (DAS) details the analysis of the character of the local area and design vernacular that has been undertaken to ensure that the characteristics of local villages are reflected in the illustrative masterplan (see DAS Section 2.4, pages 19-24). The detailed design stage will involve further research and character analysis to ensure the proposed development's design will respect the context and character of Nutfield village.</p> <p>Views from the north have been considered as part of the Landscape Visual Appraisals. The existing and proposed aerial sketches from the north, at Figures 7 and 8 of the Planning Statement and Figure 31 of the Landscape Visual Appraisal (of Viewpoint 2) clearly illustrate how the existing trees and proposed planting, landscaping and landform will screen the proposed development.</p>

A Landscape and Visual Appraisal & Green Belt Assessment has been prepared by fpcr confirms that the landscape and visual effects would be very limited and localised. The effect on Green Belt openness would be similarly limited, with existing woodland largely containing the built development, meaning here would be a negligible effect on Openness beyond the site itself.

<p>Not enough changes from the original application</p>		<p>A significant amount of work has been undertaken to overcome the previous reasons of refusal from the previous scheme. A substantially new consultant team was also appointed to re-visit and re-appraise the site reflecting on the objections and reasons for refusal of the previous scheme. Refer to Appendix 2 of the Planning Statement, prepared by hgh Consulting, setting out the previous reasons for refusal and how this proposed development addresses, amends and overcomes all of the reasons for refusal.</p>
<p>Overpopulation</p>		<p>The extensive work undertaken to support this application provides no indication or evidence to suggest that this development would result in overpopulation.</p> <p>The Government's latest Housing Delivery Test measurements for 2022 (published December 2023) confirms Tandridge is the 8th worst performing authority in the Country for the delivery of housing (38% of target housing - presumption status in favour of supporting housing development proposals).</p> <p>Tandridge has a high need for all types of housing, including affordable tenures, which is currently not being met. The Nutfield Green Park scheme would make an important, substantive and much need delivery of market, supported/older living and affordable homes, which are acknowledged to be in acute need in Nutfield and District-wide in Tandridge. The delivery of homes on this site in the next five years would make a substantive contribution to meeting the identified need without prejudicing the Council's longer term housing strategy for the District.</p>
<p>Not policy compliant</p>	<ul style="list-style-type: none"> • Not compliant with the NPPF and development plan 	<p>Please refer to Section 6 "Planning Policy" and Section 7 "Planning Assessment" of the Planning Statement, which sets out how the proposed development is compliant with national, regional and local policy.</p>

		<p>The Applicant contends that there are very considerable planning benefits that, when take together clearly outweigh the harm to the Green Belt and any other harm in accordance with policy DP10(B) and paragraph 153 (previously paragraph 148) of the Framework.</p> <p>It has been acknowledged by the Council that they cannot come close to demonstrating a five-year supply of housing land (1.57 years). Additionally, the Council do not have an up to date Development Plan, with the Local Plan Inspector recently advising the Council that the draft new Local Plan will be found unsound.</p> <p>The applicant has demonstrated the acceptability of the development in accordance with Policies DP1(c) and DP10 and therefore it is considered that the proposals comply with the development plan as a whole.</p>
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